

Modern Slavery Statement 2021

Introduction

The UK Modern Slavery Act 2015 requires businesses to state the actions they have taken during the financial year to ensure that modern slavery is not taking place in their operations and supply chain.

This statement has been published in accordance with the Modern Slavery Act 2015. This statement outlines the progress Samworth Brothers (Holdings) Limited has made during the financial year ending 31st December 2020.

Our business and supply chain

Samworth Brothers (Holdings) Limited is a privately owned, fourth generation family business dating back to 1896 with all operations located in the UK.

This statement is produced for the Group and covers the following legal business entities:

- Gibbs Croft Limited – trading as Soreen
- Manton Wood Limited
- Samworth Brothers Limited
- SCI-MX Nutrition Limited
- West Cornwall Pasty Co. Limited

The company specialises in manufacturing high quality chilled and ambient products. The business operates in several different areas including food to go, savoury pastry, prepared meals, sausages, cooked meats, plant-based and sports nutrition. The group owns several popular brands including Soreen, SCI-MX, Ginsters and the West Cornwall Pasty Co. and in 2020 acquired the sandwich brand Urban Eat and a majority share in Higgidy. Other brands include the pie specialists Walker & Son and Dickinson & Morris. Our customers are mostly large UK retailers, with some of our products being manufactured for food to go locations. Additionally, the group owns several businesses that focus on service provision, these include Samworth Brothers Supply Chain (SBSC) and Fresh Food for Now Company that provide logistics services and Westward Laboratories a food safety testing laboratory.

More than 11,000 colleagues work in the business, and we operate from some of the most well-invested and modern food manufacturing sites in the UK. Most of our colleagues are based at our manufacturing sites, with a minority working across the country in logistics and distribution roles. Due to the Covid-19 pandemic colleagues in roles where it was feasible moved to working from home.



In 2019 our company purpose and values were refreshed following focus groups with colleagues from across the business. In 2020 work on our group strategy was undertaken with Responsible Business being elevated, aligning with our core purpose of doing good things with great food. Our ambition is to make a positive difference for our people, our communities, and all stakeholders.

Communications on our purpose and values was delivered to colleagues in 2020. There were further in-depth workshops delivered in the latter half of 2020 on this, with continued roll out in 2021. In line with our strategy, purpose, and values, we are committed to reviewing and continuously improving our systems and processes for identifying modern slavery and human trafficking risks within our operations and our supply chain.

Policies

Our group Responsible Business Team and People Team are responsible for several policies that help our business to combat modern slavery. These policies are approved by our Group Executive Director responsible for our people.

- Equality and Diversity
- Modern Slavery and Forced Labour
- Human Rights
- Right to Work
- Bullying and Harassment
- Bribery & Corruption
- Community Relations
- Whistleblowing

Tackling modern slavery in our businesses

A group led project team has been established to review our approach to tackling modern slavery within our business. Our approach has been developed in line with our commitment to the Stronger Together initiative. We have supported and promoted Stronger Together since 2013, a multi-stakeholder initiative aimed at tackling modern slavery in supply chains.

The Stronger Together Toolkit has been used to identify areas within our operations that we need to strengthen. In addition to this we have partnered with Slave-Free Alliance for the next three years. Slave-Free Alliance are a social enterprise and membership initiative launched by anti-slavery charity and victim advocacy organisation Hope for Justice. Slave-Free Alliance were commissioned to conduct a gap analysis on our systems and processes to identify where we can strengthen our approach. Our gap analysis was successfully completed in September 2020. Our modern slavery prevention project team is now responsible for implementing recommendations.

The majority of our workforce are employed on permanent contracts. However, to respond to the peaks and seasonal variance in food manufacture we partner with several GLAA registered labour providers throughout the year. We have long standing relationships with our key labour providers, and they have robust onboarding and induction processes that highlight how to identify modern slavery to all workers. Additionally, our People Team regularly audits our labour providers to ensure that there is no risk of exploitation.

We encourage our people, customers, and other business partners to report any concerns related to ethical issues, within our business. This includes highlighting any red flags that could be indicators of modern slavery. Our Whistleblowing Policy is prominently displayed at all sites in areas people frequent. This provides details of our confidential, independent hotline which individuals can use to highlight any concerns they may have about any ethical issues.

In 2020 we also developed an internal ethical gap analysis that is to be completed by all our sites in 2021. This is based on the ETI base code and includes an assessment of the clause 'Employment is Freely Chosen'. We have a KPI in place to monitor our progress with this in 2021.

Training and awareness

Previously we have delivered a series of courses titled 'Introduction to Responsible Sourcing and Human Rights' to our Technical, Procurement Managers and Supply Base Auditors. In addition to this, members of our Responsible Business Team and People Teams have attended workshops and events delivered by Stronger Together and Slave-Free Alliance.

All Samworth Brothers colleagues receive an induction which includes how to spot the signs and report modern slavery. The Stronger Together video forms part of this induction for all permanent and agency colleagues. Additionally, all colleagues receive a copy of our electronic handbook - this includes the Stronger Together Video and highlights the risks and signposts support.

We recognise the need to refresh our training programme and educate the business further in this area. Our group led anti-slavery team has reviewed this and devised an extensive training schedule to be delivered across the organisation. This will provide tailored training to different functions. We intend to train all Team Leaders and Operational Managers on how to better spot the signs of Modern Slavery and we have a KPI to measure this.

Human rights due diligence in our supply chain

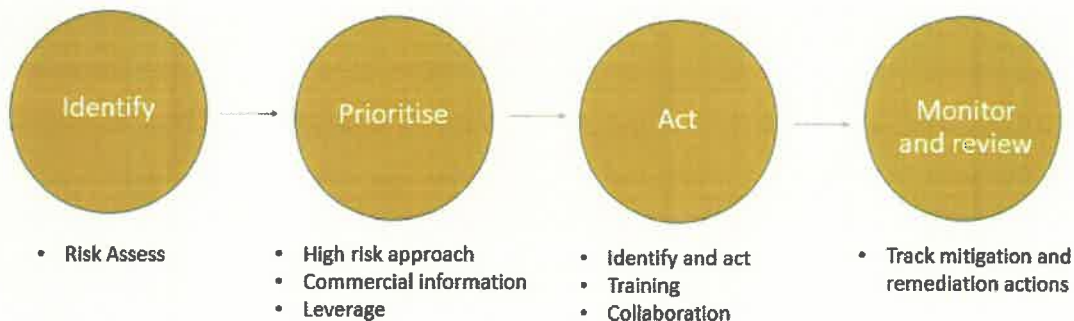
Our supply chain is extensive, and we continually aim to strengthen our approach to anti-slavery due diligence. The products we purchase fall into three major categories: ingredients, packaging, and indirect goods and services. We currently source several thousand ingredients, such as meat, produce, dairy, bakery items, palm oil and herbs and spices. Our supply chain is global; however, a large number of items are sourced from the UK.

We have identified that our tier one suppliers are currently located in approximately 20 countries, with that number greatly increasing when considering further tiers of the supply chain.

Due to the complex nature of our supply chain, we have made a significant investment and are continuing to implement a leading supplier management platform. This technology has advanced our supplier approval procedure, risk assessment and delivered enhanced supply chain traceability.

We have long standing relationships with many suppliers both in the UK and overseas. We aim to work with suppliers that share our values, however, we recognise that modern slavery is predominantly a hidden crime, and we have a role to play in uncovering and eradicating it in our supply chain.

Due to the complex nature of our supply chain, we adopt an industry best practice due diligence methodology. We have continued to strengthen and develop our process, which is built on four core principles:



- **Identify** - mapping the supply chain broadly to assess raw materials and geographical risks of modern slavery and human trafficking.
- **Prioritise** - addressing the highest risk raw materials within our supply chain.
- **Act** - collaborating with our suppliers and other stakeholders to encourage the eradication of forced labour and promote worker representation.
- **Monitor and Review** - strive for continual improvement in our process through monitoring KPIs and reviewing the outcomes achieved from the action taken.

One key tool that we use to aid risk identification is the Supplier Ethical Data Exchange (Sedex). We have been members for several years and have invested in AB membership which enables us to view suppliers' ethical trade data. As a condition of supply tier one suppliers and select tier 2 suppliers are required to join Sedex as B members, where they complete a Self-Assessment Questionnaire and link to Samworth Brothers to share this information. We also monitor any ethical audits visible on Sedex. Our supplier management platform has been built to include data fields relating to Sedex and country of origin human rights risk metrics. We have established several Responsible Business KPIs linked to our management of suppliers on Sedex, such as the percentage of suppliers linked.

This helps us to ensure we are managing and monitoring suppliers effectively. We work proactively with suppliers to ensure that appropriate actions are taken to any ethical trade risks identified.

A thorough risk assessment completed of the raw materials supply chain has identified the following top five areas which we are prioritising:

- Poultry
- Seafood

- Produce (vegetables)
- Palm Oil
- Herbs and Spices

For each of these areas we are working further with ethical trade data and mapping our supply chains and are developing KPIs in the area.

Collaborative Working

Modern slavery and human rights violations are global issues that we cannot tackle in isolation. Therefore, we work closely with our suppliers, customers, and peers to identify issues. We were founding members of the Food Network for Ethical Trade (FNET). FNET is an initiative made up of UK-based suppliers and retailers whose mission is to improve human rights in global food supply chains through a common approach to managing ethical trade. Throughout 2020 we have been part of the governance group along with several retailers and suppliers. We also contributed to the Covid Winter Response Toolkit, which provided resources to help companies in the food industry to better manage risks associated with the pandemic.

We actively participate in several FNET working groups; collaborative forums that allow members to develop common approaches to ethical trade. We have contributed to both the risk assessment and spices working group in recent years.

Samworth Brothers are founding supporters of the Modern Slavery Intelligence Network (MSIN), a non-profit collaboration between supermarkets and large food and fresh produce processors created in response to the findings of Operation Fort, the UK's largest ever Modern Slavery investigation. Formed in the second half of 2020, this group is working on an 18-month pilot to develop and trial a structured intelligence-sharing mechanism between its members which will enhance the effectiveness of their contribution to the disruption of modern slavery and labour exploitation practices. The aim is to use the information generated by this network to detect, prevent, and disrupt modern slavery and labour exploitation activity, protecting workers and improving outcomes for victims.

We are co-funding the development of the pilot in conjunction with the Institute of Grocery Distribution, and colleagues from our Responsible Business team will continue to actively contribute to the project throughout 2021. We will share further updates on the progress of this group in our 2021/22 statement.

Board approval

I am pleased to approve this statement for Samworth Brothers as Group Chief Executive and will ensure that it is reviewed annually.



Flor Healy

Group Chief Executive

May 2021