

Modern Slavery Policy Statement 2019/20

This statement sets out the steps taken by Kepak UK food manufacturing sites, (Kirkham, Huddersfield, Portlethen, Bodmin, and Merthyr Tydfil) in order to understand and mitigate all risks relating to modern slavery with regards to both the business and its wider supply chain.

We are committed to reviewing and continuously improving our practises in order to ensure conformance to the Modern Slavery Act 2015 and most importantly protect the wellbeing and safety of our employees.

Kepak recognises its responsibility to take a robust approach to modern slavery and forced labour and is committed to annually review its progress and policies relating to the issue, both internally and externally within our supply chains. This statement relates to all UK based sites.

Definitions

Slavery

The state or condition of being a slave; a civil relationship whereby one person has absolute power over another's actions, life and fortune.

Forced Labour

Any labour extracted from a person which they did not voluntarily offer themselves for.



Circa 1770 UK based employees

Over 3500+ Approved Suppliers



Responsibility and Due Diligence

Overall responsibility for the implementation and review of this policy lies with the Managers of the various Kepak sites.

Our Commitment

Kepak is fully committed to ensuring there are no modern slavery or exploitation practices present within our own operations or the operations of those we work with. This commitment forms part of our Group core values falling under our "Responsibility" pillar and is a key element of Kepak's wider corporate social responsibilities. Our commitment to the Modern Slavery Act also acts as one of our ongoing contributions to the UN's global sustainability goals.

To guarantee continued alignment with these values a monthly Modern Slavery Meeting has been established within the HR community across the UK sites. We have dedicated teams within each site who will review the site approach to Modern Slavery, share concerns and best practice and ensure pro-activity in managing conformance to the Act.

Our Supply Chain

We continually appraise and improve our approach to identifying modern slavery through technical and traceability systems which we implement throughout our supply chain. Ensuring our partners share our values is a fundamental part of our onboarding process. With a supply network processing raw material from across the UK and Europe we ensure all suppliers of goods and services have been individually assessed in terms of their compliance to the Modern Slavery Act. This is done Initially within our VAQ (Vendor Assessment Questionnaire) and then through on-site audits conducted by our technical team. Suppliers who respond with non-compliance at either stage are reviewed by appropriate members of the Group and decisions made about future purchases. In all cases we ensure corrective actions relating to modern slavery are in place before goods are purchased from the supplier. To add further visibility and security to our processes all suppliers are encouraged of become members of SEDEX (Supplier Ethical Data Exchange) and share knowledge around their practices. Kepak has an ongoing membership of SEDEX which we use to strengthen our supplier index and own best practices.

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We believe that it is the responsibility of everyone within the business to understand and prevent Modern Slavery and therefore the following actions have been implemented at each of our sites as follows:

All Sites

- Stringent requirements with right to work checks and recruitment processes
- Internal audits on the temporary staff providers
- Promote discussion on the topic at Factory Forums and Employee meetings.
- Increased the number of 'Stronger Together' trained managers
- Raised awareness around the site with posters and information in all of our spoken languages thus encouraging staff to report any wrongdoing or areas of concern
- Monthly Payroll and employee audits
- Working with Trade Unions in recognised sites to promote this topic

Kepak Kirkham

Further to the above additional measures in place at the Kirkham site also include:

- Members of every department associated with our suppliers and employee representatives form a modern slavery team (meeting quarterly), led by our Finance Director, to ensure the implementation of the modern slavery policy.
- We actively ask questions about Modern Slavery during the recruitment process.
- Staff are briefed on the Kepak approach to Modern Slavery as part of the new starter induction process
- We conduct further classroom-based training via Stronger Together for all Factory based people managers and our Supply Chain team to raise awareness of the issues and the opportunity to generate ideas and discuss best practise.

2019 / 2020 Commitments

Moving into 2019 Kepak is committed to ensuring the actions below are taken to further our commitments to ending Modern Slavery:

- A UK wide monthly meeting of HR Team to discuss Modern Slavery.
- A UK wide Young Worker policy is to be developed and published within all sites.
- Implementation of internal Modern Slavery audits at all sites to be put in place.
- Continue to embed Modern Slavery awareness and best practice within all UK businesses.

This statement covers the entirety of 2019 and up to June 2020 until an updated policy is published. This policy has been approved by our Group Board.



John Horgan, Managing Director
Kepak Group