

# Modern Slavery Statement 2020/21

## Organisation

This statement sets out the steps taken by Kepak Group Limited (Kepak), across our United Kingdom (UK) sites, to understand and combat all risk relating to Modern Slavery with regards to the business and our wider supply chain. The statement covers the financial year January 2020 to December 2020.

As part of the FMCG industry, supplying Beef and Lamb from our Red Meat Division and Rustler's products from our Consumer Foods Division, Kepak recognises its responsibility to take a robust approach to modern slavery and forced labour. This policy relates to all Kepak UK sites; Aberdeen, Bodmin, Kirkham and Merthyr Tydfil.

### Definitions

Kepak considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.



**Over 1800+ Permanent UK employees**

**Over 3500+ Approved Suppliers**



## Responsibility

We believe that it is the responsibility of everyone within the business to understand and prevent Modern Slavery. Overall responsibility for the implementation and review of this statement lies with the Site Director and HR Manager/Representative at each Kepak UK site.

## Our Commitment

Kepak acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Kepak understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

No labour provided to Kepak in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Kepak strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

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 the Kepak Core Values, falling under our "Responsibility" pillar, and is a key element of our corporate social responsibility agenda.

To assist with continued alignment across all our UK sites, Modern Slavery is discussed regularly within the UK HR function. The site operations team (which includes HR representation) also ensures the site approach to resourcing supports our Modern Slavery Statement. Both teams share concerns and best practise to ensure proactivity in managing conformance to our Modern Slavery Statement.

## Our Supply Chain

Kepak does not enter into business with any other organisation, in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. Kepak has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.



Kepak undertakes processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers. We regularly 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 beliefs is a fundamental part of our onboarding process.

With a network processing raw material from across the UK and Europe we ensure all suppliers of goods and services have been initially assessed in terms of their compliance to the Modern Slavery Act through our Vendor Assessment Questionnaire (VAQ) and Self Audit Questionnaires.

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 have an ongoing membership to SEDEX which strengthens our supplier index and own best practices.

## Due Diligence

In accordance with section 54(4) of the Modern Slavery Act 2015, Kepak has taken the following steps to ensure that modern slavery is not taking place at any of our UK sites:

- Stringent and consistent recruitment processes, right to work and identity checks
- Regular review of Labour Provider Self Audit Questionnaires
- Regular audit of Labour Providers
- 'Stronger Together' information and training included in Company Induction
- Modern Slavery discussions at employee forums
- Active engagement with recognised Trade Union(s) on Modern Slavery
- 'Stronger Together' trained managers, with additional/refresher training as required
- 'Stronger Together' signage across sites in various languages encouraging staff to report any wrongdoing or concerns
- Regular payroll and employee file audits
- Continual improvement to embed Modern Slavery awareness and best practice across all UK sites



**This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year. This statement is approved by our Chief Executive Officer, Simon Walker.**