
MODERN SLAVERY ACT COMPLIANCE STATEMENT 2018/19

This Statement is published in accordance with s.54 of the Modern Slavery Act 2015. It sets out the steps which Warburtons Limited ("Warburtons") has taken during the period 31 September 2018 to September 2019 ("FY 18/19) to prevent modern slavery and human trafficking in its operation and its supply chains.

Warburtons Business and Supply Chains – An Overview

We are a leading grocery brand in Britain, selling wrapped bakery products and a variety of Free From bakery products. Our Head office is in Bolton, England and we have 11 bakeries and 15 depots all operating within Britain, providing our customers with a daily supply of fresh, top quality products, all made in Britain.

We have over 4,500 employees in our workforce and work with over 2,000 suppliers across our supply chain.

We manage our supply chain depending on the nature of suppliers. We have direct suppliers (suppliers who provide ingredients and packaging for our products) and indirect suppliers (all other suppliers, including the provision of building and engineering services to office supplies, uniforms and utilities). We have assessed the risk of modern slavery in our own operations and within our first-tier supply base as low.

Our overall supply chain beyond the first tier extends worldwide and is multi-layered and therefore we continue to look at ways of assessing the entire supply chain in collaboration with our first-tier suppliers and managing modern slavery risk within it.

Policies in relation to Slavery and Human Trafficking

We build our business on the basis of five core values – family, ambition, responsibility, quality and care - which shape everything we do, both inside and outside the company. As such, we are committed to the requirements of the Modern Slavery Act and will continue to implement effective systems and controls to manage modern slavery risks in the supply chain.

With regard to our own operations we have a structured HR function and several policies and procedures that are designed to ensure we comply with legal requirements for our workforce. We are satisfied that our existing employment practices and procedures comply with legal requirements in relation to modern slavery and human trafficking.

We have a Supplier Code of Conduct and our Ethical Principles, each of which include our requirements for worker rights and raise awareness of modern slavery and human trafficking.

We have reviewed each of these documents and are satisfied they are sufficient to address the issues amongst our supply base and our own workforce.

In addition, we have a number of general policies and procedures that support our business compliance requirements as well as our ethical approach.

We will continue to review and refine all these policies as modern slavery issues and practices develop.

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Warburtons Due Diligence Process in relation to Human Trafficking in our Business and our Supply Chain

We continue to use the globally recognised platform, Sedex, to assess our own business practices and those of certain key first tier suppliers in our supply chain. Our Sedex assessment of our own operations is positive and does not highlight any risk areas.

For our suppliers we have a Supplier Code of Conduct that sets out the standards for them to follow. Our general terms of business require suppliers to comply with our Code. In addition, we have rolled out a communication about the Supplier Code of Conduct to our direct suppliers and some key indirect suppliers, with a specific request to confirm acceptance. The response to this during the year has been positive. The majority of our existing direct suppliers have either accepted our Code of Conduct or demonstrated to us that they have an equivalent Code in place. A small number have not yet responded, and we will follow up with them during the next financial year.

Parts of business where there is a risk and steps taken to assess and manage

Risk within our operation is low. Where we use agency labour in our operations, we work with a third party to manage agency labour provision, audit agencies and monitor compliance. We have increased our review of the audit status with our supplier from quarterly to monthly.

Risk within our first-tier supply base is low but if we identify specific risk issues in the wider supply chain we work with our first-tier suppliers to understand situation and seek change.

Training and capacity building of staff

We are currently reviewing our approach in this area both for our internal workforce and also for our HR and procurement teams.

This statement has been approved by the Executive Committee/Leadership Board of Warburtons and signed by Neil Campbell, Managing Director.



Neil Campbell
25th February 2020