
MODERN SLAVERY ACT COMPLIANCE STATEMENT 2016/17

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 25 September 2016 to 30 September 2017 ("FY 16/17") to prevent modern slavery and human trafficking in its operation and its supply chains.

Warburtons Business and Supply Chains – An Overview

The structure of our business has not changed since the previous financial year. We are a leading grocery brand in Britain, selling wrapped bakery products and a variety of Free From bakery products. We have 12 bakeries and 14 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 building and engineering work to office supplies, uniforms and utilities).

We have continued to focus on our own operations and work with some of our first-tier suppliers to assess the key risk areas for our business. Having done that further analysis of our supply chain we believe the risk of modern slavery in our operation and in our first-tier supplier base is low. Our overall supply chain 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.

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.

We have reviewed and enhanced our Ethical Principles and have developed them into a Supplier Code of Conduct. This Code will enable us to communicate our requirements to our first-tier supply base. This will increase awareness in a number of areas, including modern slavery and human trafficking issues. We will be communicating the Code in the forthcoming financial year and working with suppliers to understand the cascade of these principles further down the supply chain.

We continue to apply our Ethical Principles to ourselves and we have implemented an online portal for our employees which lists all key policies and procedures in one place. This includes a section on responsible business practices, highlighting our approach to ethics and modern slavery.

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.

In assessing our own business, we are satisfied that our existing employment practices and procedures comply with legal requirements in relation to modern slavery and human trafficking.

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

We have in the last 12 months, refined the key factors we use to assess the risks in our supply chain and we are in the process of developing further risk assessment tools to supplement the Sedex information and these tools will be embedded in our procurement process. We monitor higher risk areas more closely and are in conversation with our relevant first-tier suppliers to understand how they manage this risk further down the supply chain.

Training and capacity building of staff

We continue to have a core team of cross functional specialists, including legal, sustainability, procurement, food safety and compliance who focus on the requirements of the Act. They work in partnership with our suppliers to continuously improve our working practices to suit the flexible demands of our complex supply chain.

This statement has been approved by the management board of Warburtons and signed by Neil Campbell, Managing Director.



Neil Campbell
20th March 2018