
WARBURTONS MODERN SLAVERY ACT COMPLIANCE STATEMENT 2020/21

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 27 September 2020 to 25 September 2021 (“FY 20/21”) to prevent modern slavery and human trafficking in its operation and its supply chains.

Warburtons Business and Supply Chains – An Overview

The overview of our business has not changed in FY 20/21.

We are a leading grocery brand in Britain, selling wrapped bakery products and a variety of Free From bakery products. The make-up of our business broadly remains the same as in previous years. 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 2,400 suppliers across our supply chain.

During the last financial year, we have continued to face the pressure of feeding the nation whilst keeping our people safe throughout the Covid pandemic. The added complexity of Brexit and the UK driver crisis have also been a continuing focus for our people and our supply chain activities.

We have always taken our responsibility to the environment, our people, families, and the communities in which we operate very seriously. In the last financial year, we have redeveloped and relaunched our Sustainability strategy to ensure that we continue to operate as a responsible family business. Ethical Sourcing is one of the key pillars of our new approach and we strive to source all our ingredients, goods and services in an ethical and responsible way.

Despite the challenging environment we have been working in, we have continued to ensure that we effectively 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). Our operation is a long-standing UK based business and the bulk of our suppliers are also UK based. We have assessed the risk of modern slavery in our own operations and within our first-tier supply base as low by reason of the location of our suppliers, the nature of the goods and services they supply and the responses they provide to Sedex questionnaires.

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 achieving the objectives and requirements of the Modern Slavery Act. Through our policies and procedures, we aim to ensure that there is no place in our operation or our supply chain for modern slavery.

With regard to our own operations, we have a structured HR function and a range of policies and procedures that are designed to ensure we comply with legal requirements for our workforce. New employees are required to prove that they have a right to work in the UK. All employees are paid directly to their nominated bank account. We are satisfied that our existing employment practices and procedures continue to comply with legal requirements including in relation to modern slavery and human trafficking.

We also operate a whistleblowing helpline which allows people to raise any concerns they might have regarding our operations and compliance with the law. No concerns have been raised in relation to slavery or human trafficking.

We have a Supplier Code of Conduct and this requires suppliers to comply with standards based on the ETI base code. Compliance with our Supplier Code of Conduct (or standards at least equivalent to them) is a material term of our contracts. There are no direct suppliers that have either refused to adopt our Code of Conduct or failed to demonstrate that they have a Code to at least the same standards and we have had no reported breaches of the Code in the last 12 months.

In addition, we include the Supplier Code of Conduct within our on boarding process for direct suppliers. We are continuing to develop our on boarding process and will continue to take a multi-faceted risk-based approach to supplier selection and review.

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

In addition to our Supplier Code of Conduct, we have continued to use Sedex to assess our own business practices and those of certain suppliers in our supply chain.

As part of our Ethical Sourcing approach we have set up a Supplier Ethical Risk Group and have reviewed the Sedex Self-assessment questionnaires of our Tier 1 suppliers. Using the Sedex Risk Assessment matrix we have identified that none of our suppliers fall into the high risk category.

The Supplier Ethical Risk Group have also documented an Assessment and Control of Supplier Ethical Risk procedure to formalise our approach to assessing and mitigating ethical risk identified in our supply chain. The procedure outlines clear responsibilities for key roles within our business and our requirements in terms of;

- Onboarding of Suppliers
- Risk assessment process including risk score parameters and associated timescales for review
- Review of the risk assessment output
- Escalation process

We will continue to work through our assessments of Sedex information during the next financial year, as the Sedex information is updated on an ongoing basis. We will also roll out our code of conduct due diligence across our indirect supplier base.

Parts of the business where steps have been taken to manage and assess risk

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. During this financial year we have not had to terminate any agencies due to any concerns about modern slavery.

Risk within our first-tier supply base is also low but if we identify specific risk issues in the wider supply chain, we will work with our first-tier suppliers to understand the situation and seek change. However, we have had no breaches of the code of conduct of which we have become aware in the last 12 months.

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 including reviewing our use of the Sedex Framework.

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



Neil Campbell

30/3/2022

Date