
WARBURTONS MODERN SLAVERY ACT COMPLIANCE STATEMENT 2022/23

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 financial year ending 30 September 2023 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 goods. The make-up of our business broadly remains the same as in previous years. We have a Head Office in Bolton, England and across the U.K. we have 11 bakeries and 15 distribution sites. We employ nearly 5,000 people and we work with over 2,400 suppliers across our supply chain. We supply most of the major U.K. supermarkets with our products along with convenience stores and other discount retailers in the U.K. Whilst we do export small amounts of our products, the majority of our business and our operations are focused on the U.K.

Whilst we have a significant number of suppliers, the majority of our expenditure will be with companies in the U.K. or the European Union. These countries are inherently lower risk from a modern slavery perspective.

As might be expected from a business like Warburtons, the supply chain is diverse. In order to bake and distribute our products we rely on a wide range of suppliers including:

- Agency labour to cover sick leave and other absence
- Utilities to help fuel our ovens and keep our factories running
- Flour and other raw materials to make our products
- Packaging to help pack our products
- Vehicles and fuel to get our products to stores
- Laundry services for our uniforms and cleaners for our sites
- Software and IT equipment to keep a record on what we do and to help receive orders from customers
- Professional advisors to help us meet our legal duties and to keep on top of our engineering requirements

We recognise that the nature of modern slavery risks will be different for each of these types of suppliers. We describe below some of the steps we take to ensure there is no modern slavery either within our own business or the supply chain. However, due to our systems and processes we consider our own employed workforce to be at low risk and we also consider our direct suppliers of utilities, professional services, software and technology, engineering parts and similar suppliers to also all be low risk. Many of our other suppliers are also low risk because they are U.K. based and they are not within sectors which are known for being exposed to modern slavery.

As a long-standing company, many of our suppliers are well known to us and they have worked with the business for a long period of time. They will very often reflect our values which we incorporate into our Supplier Code of Conduct (and which is made available on our website).

As with many businesses, the external environment has been a difficult one given the cost-of-living challenge. However, we work constructively with our supply chain to seek to ensure that they don't pursue unethical practices in their own operations. We do not therefore believe that the cost-of-living crisis has changed our overall risk exposure to modern slavery.

We also continue to govern our modern slavery risks through a stakeholder approach which sees our procurement, legal, sustainability and wheat and flour buying teams working together to ensure that we buy products with ethical sourcing as one of the key pillars of our approach. This group of people meets on a regular basis to review our policies, procedures and practices and to continually improve what we do to buy products and services in the right way.

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. During the financial year, the themes of responsible, safe and trusted were also incorporated into our strategic approach. As such, we are committed to achieving the objectives and requirements of the Modern Slavery Act. Through our policies and procedures, we strive 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. The checks that we have in place have revealed no issues during the financial year.

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 through the helpline in relation to slavery or human trafficking. Our HR team also meet regularly with our two recognised Unions (the Bakers, Food and Allied Workers Union and the United Road Transport Union). No concerns have been raised through these fora regarding modern slavery in the workplace.

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. No supplier has reported any breaches of the Supplier Code of Conduct in the last 12 months and no supplier has raised any related concerns.

There has therefore been no requirement to undertake any investigations in the last financial year regarding any modern slavery concerns (none having been raised).

Finally, 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 and steps taken to manage and assess risk

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:

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

In relation to our own business, checks have now been introduced to provide comfort that there are no signs of modern slavery within our own workforce. These checks include a search on whether there are any duplicate bank accounts for different employees or duplicate addresses for different employees. The checks carried out in the last financial year gave no cause for concern.

Additional enquiries were made with our laundry, agency labour and bakery equipment suppliers. Whilst they had varying degrees of control and due diligence in place, none of them reported any concerns to us.

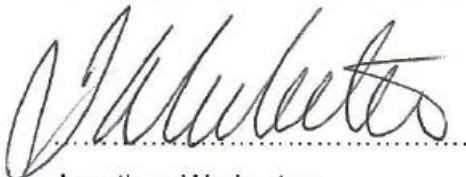
Training and capacity building of staff

Online training continues to be made available on Warburtons' learning platform to all management grades within the company. Training slides are also available for staff on our intranet. During the course of the next financial year our Code of Conduct will be launched for all staff. This covers the ethical standards expected of all employees.

Future Focus

For the following financial year, we will be focusing on continuing to embed our due diligence and risk assessment processes and having ongoing engagement with key suppliers in the areas of highest risk. We will consider bespoke training for relevant employees.

This statement has been approved by the Main Board of Warburtons and signed by the Chairman



Jonathan Warburton

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Date 19 / 03 / 2024.