
Warburtons Modern Slavery Act

Compliance Statement 2023/24

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 2024 to prevent modern slavery and human trafficking in its operation and its supply chains.

1. Overview of the business

Warburtons is 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 now also operate a subsidiary in Australia. We employ nearly 5,000 people, and work with over 2,400 suppliers across our supply chain. We supply most of the major U.K. supermarkets, as well as convenience stores and 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.

Due to our systems and processes, we consider our own employed workforce to be at low risk of modern slavery.

2. Supply chains

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. We consider our direct suppliers of utilities, professional services, software and technology, engineering parts and similar suppliers to be equivalently low risk to our own workforce. Many of our other suppliers are also low risk, because they are U.K. based and do not operate within sectors known for being exposed to modern slavery.

The Warburtons 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 store
- Laundry services for our uniforms and cleaners for our sites
- Software and IT equipment to keep a record of 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. However, as a long-standing company, many of our suppliers are well known to us. They will very often reflect the values that we incorporate into our Supplier Code of Conduct.

The external environment has remained challenging, but we are continuing to work constructively with our supply chain to seek to ensure that they do not pursue unethical practices in their own operations.

3. Policies in relation to slavery and human trafficking

Our business is guided by our employee Code of Conduct and five core values – family, ambition, responsibility, quality and care – which shape everything we do, both inside and outside the company. This new Code was introduced during the last financial year, and also incorporates the themes of responsibility, safety and trust in our strategic approach. As such, we are committed to achieving the objectives and requirements of the Modern Slavery Act, and through our policies and procedures, we strive to ensure that there is no place in our operation or our supply chain for modern slavery.

We 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.

a. In our own operations

Our own operations 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, including:



- New employees are required to prove that they have a right to work in the U.K.
- All employees are paid directly to their nominated bank account.
- A whistleblowing helpline is in place that allows any concerns regarding our operations and compliance with the law to be raised.
- Our HR team meet regularly with our two recognised Unions (the Bakers', Food and Allied Workers' Union and the United Road Transport Union).

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, and no concerns have been raised via the whistleblowing helpline or the recognised Unions.

b. In our Supply Chain

We have a Supplier Code of Conduct, and this requires suppliers to comply with standards based on the Ethical Trading Initiative (ETI) base code. This includes principles such as freely chosen, regular employment. Compliance with our Supplier Code of Conduct (or standards at least equivalent to it) 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 processes 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.

4. Due diligence and steps taken to manage/assess risk

In addition to our Supplier Code of Conduct, we have continued to use the Supplier Ethical Data Exchange (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

5. 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.

We have now launched a new Code of Conduct for all staff, covering the ethical standards expected of all employees. This is based around our five core principles of family, ambition, responsibility, quality and care. Behaviour that conflicts with legal requirements will not be tolerated.

6. 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.

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



Chairman

10 March 2025

