

## Modern Slavery Statement – April 2019

### Introduction

This statement sets out The Billington Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and the supply chains within which we operate. This statement relates to actions and activities during the financial year 01<sup>st</sup> September 2017 to 31<sup>st</sup> August 2018.

As part of food and agricultural business, the organisation recognises that we have a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

This statement covers the activities of The Billington Group:

The Billington Group started trading in 1858 and consists of a growing family of trading and manufacturing businesses. We are proud to be one of the UK's largest, family-owned businesses, operating a number of market leading companies.

### Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Subsidiary leadership teams are responsible for ensuring the robustness and delivery and effectiveness of its modern slavery policy.
- **Training:** Site People teams regularly attend training workshops to ensure skills are refreshed and are required to then share this knowledge within the business.

### Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline which is publicised widely within our businesses.
- **Employee code of conduct:** Our values make it clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- **Supplier code of conduct:** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Agency workers policy:** We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency.

### Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier via our supplier approval process;
- Conducting supplier audits or assessments through our own internal auditing, which includes a focus on slavery and human trafficking where general risks are identified;
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular with strong connections to the Stronger together initiative.

### Training

The organisation requires all key staff to complete training on modern slavery as part of the onboarding process and through dedicated training where appropriate.

The organisation's modern slavery training covers areas such as:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.

### Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline.

### Board approval

This statement was approved on 09<sup>th</sup> April 2019 by the organisation's board of directors, who review and update it annually.



**Gary Blake**  
Chief Executive Officer



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Group People Director