



Modern Slavery Act 2015: Slavery and Human Trafficking Statement 2018

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (MSA) and constitutes Griffith Foods Limited ("**Griffith Foods**") slavery and human trafficking statement for the financial year ending 30th September 2018.

It sets out the steps that Griffith Foods has undertaken, and continues to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Griffith Foods adopts a zero tolerance approach to modern slavery, trafficked, bonded, and compulsory, child, forced labour or servitude in our own business and also that of our suppliers and sub-contractors. We are committed to working with all of our employees and suppliers to maintain, develop and continuously improve standards using the principles in our policies.

OUR ORGANISATION

We are a global manufacturer of food products. We provide a range of taste and texture components for food industry customers globally and regionally. Our customers include food processors, restaurant operators and grocery retailers.

OUR BUSINESS

Griffith Foods UK Limited is a wholly owned subsidiary of Griffith Foods Inc. We are a food ingredients manufacturer primarily in the business to business sector.

OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We operate internal policies to ensure that we are acting ethically and with integrity in every part of our business. Our Ethical Trading Standards Policy sets out our zero tolerance approach to modern slavery in our business and in the business of our suppliers and sub-contractors. The policy is displayed on our company intranet, noticeboards throughout our offices and communicated to our suppliers and sub-contractors. Our Ethical trading commitment is supported by a number of employee rights policies.

We have a Sustainability Report which highlights our company's continuous improvement approach to maintaining sustainability in every part of our business. Our commitment to sustainability in our supply chain is demonstrated by the programme, "Griffith Sustainably Sourced", which ensures that farmers who we source from receive a fair wage and work in a safe environment. <http://www.griffithfoods.com/whoweare/Documents/StrivingforBetter.pdf>

Additionally, we have a Code of Ethics and Business Conduct ("**Code**") which sets out the company's long-standing commitment to operating lawfully and with the highest standards of social responsibility, both for our company and our suppliers.



OUR SUPPLY CHAIN

Griffith Foods operates a supplier policy and maintains a preferred supplier list.

We conduct due diligence on all suppliers before allowing them to become a preferred supplier. Our supplier Approval Management System includes a risk assessment process which allows us to determine which of our potential suppliers are suitable for approval for use within the business.

We conduct a full audit of the recruitment agency that supplies our factory with temporary labour every 6 months. To ensure compliance with UK law and Company policy the agency used is required to adhere to our Ethical Trading Standards policy relating to the supply of agency labour. We also require the agency to confirm their compliance with the Modern Slavery Act and provide evidence of their own Modern Slavery Policy.

Our audit includes a review of the contractual agreement between the agency and their employees, a review of their right to work documentation, training records, policies and specific attention to the implementation of their own modern slavery statement.

Our Ethical Trading Standards Policy forms part of our contract with all suppliers and sub-contractors. The General Manager and Human Resources Manager are responsible for implementing and monitoring the Ethical Trading standard. Any concerns as to whether or not the Ethical Trading Standards are being met are referred to the Human Resources Department.

Additionally, we have a Supplier Requirement Handbook which sets out our zero tolerance approach to modern slavery. We require our suppliers to sign and return a copy of the Supplier Acceptance Response Form and a copy of our Ethical Trading Policy to ensure that they comply with it. Their compliance declaration is kept on record. Any issues are referred back to the buyers to follow up with the supplier if appropriate. We encourage suppliers to return any copies of their own codes of conduct & also expect them to comply with GFSI accreditations wherever possible.

In addition to the above, as part of our contract with suppliers, we require that they provide confirmation that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

TRAINING

All our employees have attended elearning on the Ethical Trading Standards Policy.



OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We have not identified any instances of modern slavery or human trafficking when carrying out our supplier audits and investigations. We will continue to measure the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by:

- Monitoring if any reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- The use of labour monitoring and payroll systems.
- The use of grievances mechanisms and or access to anonymous whistleblowing procedure.
- Following our internal process for supply chain verification.
- The level of communication and personal contact with next link in the supply chain.
- Continuing to raise awareness of Modern Slavery and the completion of audits.

APPROVAL FOR THIS STATEMENT

This statement was approved by the President Griffith Foods Europe on 29 March 2019 for the financial year ended 30 September 2018.

Name: Wim Van Roekel

Signature :

Date :

29/3/2019