



LABOUR EXPLOITATION POLICY

Policy version: DWB HR100 v4

Issue date:
19.09.2018

Approved by : David Wood

ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

I. Purpose.

David Wood Baking Ltd have a strong commitment to prohibiting human trafficking and slavery by any of its' business entities, employees, and other parties associated with DWB. In compliance with the law, and to effectuate DWB's commitment to prohibiting these practices, this Anti-Slavery and Human Trafficking Statement (hereafter referred to as the "Anti-Slavery Statement") serves to ensure a work environment that is free from human trafficking, forced labour and unlawful child labour (Slavery and Human Trafficking).

DWB strongly believes that it is responsible for promoting ethical and lawful employment practices amongst the DWB group. These practices are also required to be followed by our suppliers, subcontractors or business partners worldwide (collectively "Suppliers"). DWB strongly opposes any use of slavery or human trafficking in the distribution of its own products, or its client's products, and fully supports the promotion of ethical and lawful business practice within our workplace.

All DWB sites are subject to (semi announced) Sedex Members Ethical Trade (SMETA) audits by authorised commercial auditing bodies, we have also upgraded our Sedex Membership to A/B Buyer/Supplier members. DWB is a proud Business Partner member of stronger together. To assist in promoting stronger together we;

- Arrange for Senior Managers to undergo Stronger Together training
- Have included the stronger together DVD as part of our company induction
- Display stronger together information such as posters and leaflets on company notice boards and information monitors
- Encourage peoples ideas and suggestions through our Works Council Committee forums

II. Scope.

This policy covers all employees of DWB and all of its subsidiaries or entities controlled by DWB, and all our suppliers In the event that anything in this policy may conflict with local law, local law will control the interpretation and application of this policy statement.

III. Definitions.

Human Trafficking: The recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour: All work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour: Consists of the employment of children that is economically exploitative, or is likely to be hazardous to or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.



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IV. Rationale.

DWB will not tolerate or condone the use of unlawful child labour or forced labour in the supply of goods and services it sells, and will not accept goods or services from suppliers that utilize child labour in any manner in any part of our organization. Human trafficking and slavery are intolerable crimes; so DWB will not deal or associate with person(s) or organisations(s) that engages in these practices. These crimes exist in countries throughout the world. This statement shall define DWB's efforts and commitment to eradicate human trafficking and slavery from not only our organization but also from our own supply chains.

V. Requirements.

David Wood Baking's suppliers are an important part of our success and our culture. We expect each of these business partners to conduct their business with the same commitment to ethical business practices as DWB Ltd. Where our suppliers are not registered on Sedex, they will be required to complete much more comprehensive ethical questions on our group supplier approval questionnaire (SAQ) which covers the requirements of the ethical trade initiative (ETI) base code.

David Wood Baking Ltd and its suppliers:

- Will not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily, under threat of penalty.
- Will ensure that the overall terms of employment are voluntary.
- Will not hold passports of migrant workers.
- Will not pay fees to agents other than reputable temp worker agencies where there is an opportunity for workers to engage in temporary to permanent employment.
- Will comply with the minimum age requirements prescribed by applicable laws unless a specific contract contains stricter age requirements.
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay agreements.

David Wood Baking Ltd will abide by applicable law concerning the maximum hours of labour – such as the provisions of Working time Directive(s) or other applicable laws.

DWB will keep records of, and be entirely transparent in complying with the above.

VI. Consequences.

Suppliers of DWB who engage in human trafficking and Slavery will have their supply agreements terminated. Suppliers must be able to demonstrate compliance with this policy at the request and satisfactions of DWB. If a supplier to DWB is found to be in violation of this policy statement, DWB will take prompt, remedial measures to address the violation including but not limited to termination of the business relationship and involvement of legal authority(s).

David Wood

David Wood.

Managing Director

Date: 19th September 2018