

LABOUR EXPLOITATION POLICY

Policy version: DWB HR100 v6

Issued in: March 2021

Approved by: David Wood

ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

Business Overview

David Wood Baking UK Ltd and David Wood Baking Ltd (Both hereafter referred to as DWB) has Seven UK manufacturing sites spread across the country and Head Office (Admin only) based in Leeds, Rothwell.

We utilise a variety of ingredients/packaging in our manufacturing processes, which are sourced from various approved/accredited suppliers mainly in the United Kingdom and Europe and minimally from other sub regions across the world.

Scope

This policy covers all employees of DWB, and all its subsidiaries or entities controlled by DWB, and all our suppliers. If anything within this policy conflicts with local law, local law will control the interpretation and application of this policy statement.

Definitions

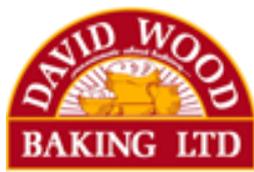
Human Trafficking: The recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits 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.

Modern Slavery and Human Trafficking Policy

As stated in our Human Rights and Anti-slavery Policy (Section 6 - Antislavery and Human trafficking policy). DWB commits to ensure that modern slavery and human trafficking does not take place within its business and supply chain. We are fully committed to acting with the upmost integrity and we expect the same from our supply chain.



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Due Diligence Processes

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 utilise child labour in any manner in any part of our organisation.

Human trafficking and slavery are intolerable crimes; so DWB will not deal or associate with person(s) or organizations(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 organisation but also from our own supply chains.

DWB 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 - be registered with SEDEX, Conduct SMETA audits and demonstrate compliance to the principles of the ETI base code. Where our suppliers are not registered on SEDEX, they will be required to complete the ethical section of the DWB supplier approval questionnaire (SAQ) which covers the requirements of the ethical trade initiative (ETI) base code. Based on the outcome of the risk assessment, high risk suppliers will be subjected to further monitoring processes including audits.

DWB and its suppliers:

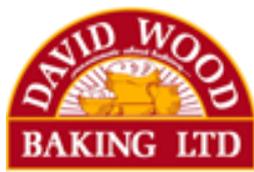
- Will not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily, under threat of penalty.
- Will ensure that the overall terms of employment are voluntary.
- Will not hold passports of migrant workers.
- Will not pay fees to agents other than reputable temp worker 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.

Within this financial year, the following steps have been taken in respect of training to reinforce our commitment to meeting the above requirements:

- Ethical Audit and Worker Committee workshop training carried out across all sites
- Ethical Audit and Workshop training delivered by a reputable third-party company across all sites within DWB, this was delivered to all senior and middle management staff
- All DWB employees have been taken through the Stronger Together (Tackling Modern Slavery) training.
- Stronger Together (Tackling Modern Slavery) questionnaire has been introduced and is to be completed within the first twelve weeks of employment by all employees.

DWB 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.



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Supply Chain Compliance and Monitoring

DWB has an effective supply chain assessments and monitoring mechanism in place to identify potential risks. If and when potential risks are identified, then there is a robust system in place to help mitigate or eliminate them.

Training

All DWB sites are subject to (semi announced) SEDEX Members Ethical Trade (SMETA) audits by authorised independent commercial auditing bodies every two years, we hold a SEDEX Buyer/Supplier A/B membership. DWB are a proud Business Partner members 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 across all sites
- Encourage people's ideas and suggestions through our Works Council Committee forums
- All works council reps are elected by the workforce and trained via a third party
- All sites have a Whistle blowing policy in place, this includes a confidential email and phone line which are independent to site operations
- Stronger together employee survey, uses survey outcome to address areas whereby improvements are required.

The effectiveness of these systems is measured using:

- The works council meeting minutes and actions log – completion levels and timelines
- Reports raised via the confidential email and phone line – How well they have been addressed
- Outcome and findings from the SMETA audits – To ensure NC's have been closed out
- Findings from the Stronger together employee survey – Reviewing and addressing feedback and comments
- Findings from the Employee Satisfaction Surveys – Reviewing and addressing feedback and comments
- Findings from the supplier risk monitoring programme – Identified risks and mitigations

This statement is in respect of the financial year ending 30th November 2020 in compliance with part 6 section 54 (1) of the Modern Slavery Act 2015.

David Wood

A handwritten signature in blue ink that reads 'David Wood'.

Managing Director

Date: March 2021