

# Modern Slavery Statement 2022

## Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. This statement outlines the progress Samworth Brothers (Holdings) Limited has made during the financial year ending 31<sup>st</sup> December 2021.

## Our business and supply chain

Samworth Brothers (Holdings) Limited is a privately owned, fourth generation family business dating back to 1896, with all operations located in the UK.

This statement is produced for Samworth Brothers (Holdings) Limited and covers the following legal business entities:

- Gibbs Croft Limited – trading as Soreen
- Manton Wood Limited
- Samworth Brothers Limited
- SCI-MX Nutrition Limited
- West Cornwall Pasty Co. Limited
- Higgidy Ltd

The company specialises in manufacturing high quality chilled and ambient products. The business operates in several different areas including food to go, savoury pastry, prepared meals, sausages, cooked meats, plant-based and sports nutrition. In 2021 the group owned several popular brands including Soreen, SCI-MX, Ginsters and the West Cornwall Pasty Co. and in 2020 acquired the sandwich brand Urban Eat and a majority share in Higgidy. Other brands include the pie specialists Walker & Son and Dickinson & Morris. Our customers are mostly large UK retailers, with some of our products being manufactured for food to go locations. Additionally, the group owns several businesses that focus on service provision, these include Samworth Brothers Supply Chain (SBSC) and Fresh Food for Now Company that provide logistics services and Westward Laboratories, a food safety testing laboratory.

More than 11,000 people work in the business, and we operate from some of the most well-invested and modern food manufacturing sites in the UK. Most of our people are based at our manufacturing sites, with a minority working across the country in logistics and distribution roles.

During 2021 work continued on the Group Responsible Business Strategy. A materiality assessment was undertaken to understand what key areas need to be focussed on in the coming years; this included gaining views from both internal and external stakeholders. Our new strategy is aligned with our core purpose of doing good things with great food. It is comprised of three pillars:

- 1) Taking action on climate
- 2) Sourcing with care
- 3) Supporting health and wellbeing

Underneath these pillars we have nine focus areas, with action on modern slavery included.

## Policies

Our group Responsible Business Team and People Team are responsible for several policies that help our business to combat modern slavery. These policies are approved by the relevant Group Executive Director.

- Equality and Diversity
- Modern Slavery and Forced Labour
- Human Rights
- Right to Work
- Bullying and Harassment
- Bribery & Corruption
- Community Relations

- Whistleblowing

### **Tackling modern slavery in our businesses**

A project team was established to review our approach to tackling modern slavery within our business and this continued to meet in 2021.

We have partnered with Slave-Free Alliance - a social enterprise and membership initiative launched by anti-slavery charity and victim advocacy organisation Hope for Justice. Slave-Free Alliance were commissioned to conduct a gap analysis on our systems and processes in 2020 to identify where we can strengthen our approach. Our modern slavery prevention project team is responsible for implementing recommendations and they continued to meet to progress this in 2021.

We have promoted Stronger Together since 2013. Stronger Together is a multi-stakeholder initiative aimed at tackling modern slavery in supply chains. We also utilised resources from Stronger Together to help us conduct a gap analysis of our progress.

The majority of our workforce are employed on permanent contracts. However, to respond to the peaks and seasonal variance in food manufacture we partner with several GLAA registered labour providers throughout the year. We have long standing relationships with our key labour providers, and they have robust onboarding and induction processes that highlight how to identify modern slavery to all workers. Additionally, our People Team regularly audits our labour providers as part of our due diligence in this area.

We encourage our people, customers, and other business partners to report any concerns related to ethical issues, within our business. This includes highlighting any red flags that could be indicators of modern slavery. Our Whistleblowing Policy is prominently displayed at all sites in areas people frequent. This provides details of our confidential, independent hotline which individuals can use to highlight any concerns they may have about any ethical issues.

In 2020 we also developed an internal ethical gap analysis that was successfully completed by our sites in 2021. This was based on the ETI base code and includes an assessment of the clause 'Employment is Freely Chosen'. During these sessions we discussed training and awareness of indicators of modern slavery.

### **Training and awareness**

During 2021, a range of colleagues attended Stronger Together training. Induction at Samworth Brothers includes how to spot the signs and report modern slavery. The Stronger Together video forms part of this induction for all permanent and agency colleagues. Additionally, all colleagues receive a copy of our electronic handbook - this includes the Stronger Together Video and highlights the risks and signposts support.

We have plans to refresh our training programme and educate the business further in this area and this is a key part of the sourcing with care element of our strategy. Our group led anti-slavery team has reviewed this and devised an extensive training schedule to be delivered across the organisation. This will provide tailored training to different functions. We intend to train all Team Leaders and Operational Managers on how to better spot the signs of Modern Slavery and we have a KPI to measure this.

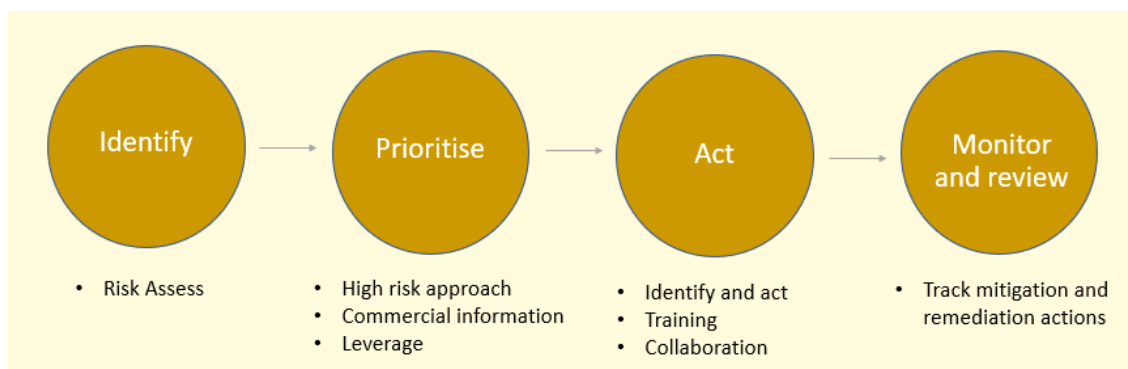
### **Human rights due diligence in our supply chain**

Our supply chain is global, and we continually aim to strengthen our approach to anti-slavery due diligence. The products we purchase fall into three major categories: ingredients, packaging, and indirect goods and services. We currently source several thousand ingredients, such as meat, produce, dairy, bakery items, palm oil and herbs and spices, with a large number of items being sourced from the UK.

We have made a significant investment and are continuing to implement a leading supplier management platform. This has advanced our supplier approval procedure, risk assessment and delivered enhanced supply chain traceability.

We have long standing relationships with many suppliers both in the UK and overseas. We aim to work with suppliers that share our values, however, we recognise that modern slavery is predominantly a hidden crime, and we have a role to play in uncovering and eradicating it in our supply chain.

We adopt an industry best practice due diligence methodology. We have continued to strengthen and develop our process, which is built on four core principles:



- **Identify** - mapping the supply chain broadly to assess raw materials and geographical risks of modern slavery and human trafficking.
- **Prioritise** - addressing the highest risk raw materials within our supply chain.
- **Act** - collaborating with our suppliers and other stakeholders to encourage the eradication of forced labour and promote worker representation.
- **Monitor and Review** - strive for continual improvement in our process through monitoring KPIs and reviewing the outcomes achieved from the action taken.

One key tool that we use to aid risk identification is the Supplier Ethical Data Exchange (Sedex). We have been members for several years and have invested in AB membership which enables us to view suppliers' ethical trade data. As a condition of supply tier one suppliers and select tier 2 suppliers are required to join Sedex as B members, where they complete a Self-Assessment Questionnaire and link to Samworth Brothers to share this information. We also monitor ethical audits on Sedex. Our supplier management platform has been built to include data fields relating to Sedex and country of origin human rights risk metrics. We have established several Responsible Business KPIs linked to our management of suppliers on Sedex, such as the percentage of suppliers linked.

This helps us to ensure we are managing and monitoring suppliers effectively. We work proactively with suppliers to ensure that appropriate actions are taken to any ethical trade risks identified. A thorough risk assessment completed of the raw materials supply chain has identified several priority areas.

For each of these areas we are working further with ethical trade data and mapping our supply chains and are developing KPIs in the area.

### **Collaborative Working**

Modern slavery and human rights violations are global issues that we cannot tackle in isolation. Therefore, we work closely with our suppliers, customers, and peers to identify issues. We were founding members of the Food Network for Ethical Trade (FNET). FNET is an initiative made up of UK-based suppliers and retailers whose mission is to improve human rights in global food supply chains through a common approach to managing ethical trade. Throughout 2021 we have been part of the governance group along with several retailers and suppliers.

We actively participate in several FNET working groups; collaborative forums that allow members to develop common approaches to ethical trade. We have contributed to both the risk assessment and Raw Materials working group in recent years.

Samworth Brothers are founding supporters of the Modern Slavery Intelligence Network (MSIN), a pioneering non-profit collaboration in the UK food and agriculture sector. Please see this website for further details - [www.msini.org.uk](http://www.msini.org.uk).

**Board approval**

I am pleased to approve this statement for Samworth Brothers as Group Chief Executive and will ensure that it is reviewed annually.

**Hugo Mahoney****Group Chief Executive****May 2022**