



MODERN SLAVERY STATEMENT

Burton's Biscuit Company (a trading name of Burtons Foods Limited) ("Burton's"), and Fox's Biscuits Limited ("Fox's") – together (Fox's Burton's Companies – FBC UK) Slavery and Human Trafficking Statement for the Financial Year 2021 - 2022 ending on 27 August 2022*

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Introduction

We employ just under 4000 people around the UK, in our manufacturing facilities in Llantarnam, Edinburgh, Blackpool, Dorset, Livingston, Arran, Kirkham and Batley as well as a central distribution hub in Liverpool. Our head offices are based in St. Albans and Batley. We also engage temporary labour at sites, via labour agencies and we outsource certain services to third party providers.

Core Philosophy

FBC UK take its responsibility for the lives of those employed by it and the environment in which it operates seriously. Our core philosophy is inspired by a solid commitment to ethical conduct and integrity. With this in mind, FBC UK commits to ensuring it and its partners and suppliers, adhere to strict ethical standards. FBC UK recognizes the value of third parties such as our suppliers, trade partners, distributors and vendors and through our new Code of Conduct and Human Rights Policy, we invite them to be united in our core philosophy, by sharing our expectations in terms of products safety, quality, sustainability, and business ethics, on a global scale. The Code of Conduct and the Human Rights Policy can be found on our intranet and website.

New joiners as part of their induction are introduced to the ETI code and the standards contained within it which include the following:

- Employment is freely chosen;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive; and
- No discrimination is practised.

Speak-Up Policy

FBC UK has just launched a new Speak-Up Policy and we have free and anonymous helplines in place for both Burton's and Fox's where employees and agency workers can report any concerns regarding internal practices, employment standards or ethics.

The policy also allows employees and workers to raise concerns via email and via our intranet.

*Burton's Foods changed its Financial Year End from December to August. The 2021-2022 was a short accounting period of 9 months

Operations

As a biscuit manufacturer, we have a large number of suppliers of ingredients, packaging and services. To ensure best practice throughout our supply chain, we have a comprehensive supplier and material approval review procedure. We request that all suppliers be members of Sedex. We also request supply chain maps from our suppliers that will show the route of the ingredients from source to delivery to ourselves. Our trading terms also require suppliers to perform services in accordance with ethical trading initiatives and industry standards and to adhere to our Code of Conduct.

FBC UK has long recognised the benefits of using ethically and sustainably sourced raw materials. We also only source cocoa based products from suppliers that are members of the ICI (International Cocoa Initiative) or the WCF (World Cocoa Foundation). The ICI supports schemes and organisations that are working to eradicate child labour in the cocoa sector and the WCF funds work to ensure the sustainability of the cocoa industry through programmes such as The Sustainable Tree Corps Program and also helps improve the livelihood of cocoa farmers.

Employees/Agency Workers

We are constantly reviewing processes in place and actions required to reduce all strategic risks where economically possible. We undertake checks on employee's bank accounts to identify any instances of multiple employees linked to one account. Our factory sites are also subject to independent audits at a frequency based on risk. We continue to raise awareness in the business and have included more in our induction and employee learning platform.

Members our HR teams have attended Modern Slavery workshops run by Stronger Together, a not for profit organisation, the focus of which is to help attendees understand the responsibilities and best practice associated with tackling modern slavery in UK businesses and to enable them to better identify instances of modern slavery should they exist in the workforce.

Collaboration

FBC UK is a member of Sedex (the Supplier Ethical Data Exchange), a not-for-profit membership organisation dedicated to driving improvements in responsible social and ethical business practices in global supply chains. As members of Sedex, we actively monitor the ethical standards to which we, and our suppliers, adhere to and it is the preferred method for ongoing assessment of our supply base. Approximately 96% of our supply base is Sedex registered, with remaining suppliers further screened on ethical standards prior to approval.

We have successfully passed audits which include checks on the systems we have in place to protect against modern slavery. We are pleased that we have not encountered any issues regarding this and as a company we are satisfied with the steps being taken. That said we are continuously monitoring (together with our suppliers) what steps we can take to build on the initiatives we already have in place. We have introduced key indicators which we will use to not only monitor our own performance, but to report to external interested parties in progress against our policy and standards. These KPI's set out in Table 1 below, underpin our focus on improving modern slavery risk awareness and understanding across our business and through our supply chain.

Table 1:

KEY PERFORMANCE INDICATOR	RESULT 2022	TARGET 2023
% of Sites that have completed Stronger Together Training	90%	100%
% of Sites that have completed the Modern Slavery Risk Assessment action plan	0	100%
% of Sites that have completed an agency ethical audit every 6 months	100%	100%
% of Whistleblower Cases relating to Modern Slavery	0	0
% of Whistleblower Cases closed out	100%	100%
% of raw material suppliers registered on SEDEX	97.48%	100%

Approved by the Board of:



Signed by SIMON BROWNE, CEO

On behalf of Burton's Foods Limited and Fox's Biscuits Limited

