



Policy Statement: Modern Slavery Act 2015

Introduction:

One of the requirements of the UK Modern Slavery Act 2015 is that businesses in the UK with annual turnover of £35 million introduce transparency and reporting obligations of progress made in ensuring that human rights infringements is absent from the business including its' supply chain. We are obligated by the Act to publish a "Modern Slavery Statement" at the end of each financial year detailing the steps taken to ensure the prevention of modern slavery and human trafficking within the business.

The Silver Spoon Company sources materials worldwide and as a result we have a heightened awareness of our responsibility for our people and people in our supply chain who make it possible for us to continue to supply safe products to our customers. Our Code of Practice and Policies which set out the non-negotiable minimum requirements to which we ask our suppliers to comply, are shared with our direct suppliers (Tier 1). They are kept under constant review to ensure that they remain appropriate and effective in eliminating the risks of modern slavery within our business and supply chain. We use ethical risk assessment tools as a method for identifying where there may be the likelihood of potential human rights infringement.

The Silver Spoon Company (SSC) supplies a variety of food products such as sugar (cane and beet origin), desert syrup, milkshake syrup, flour, waffle cones and wafers, under its own brand and for customers' own brand. The products are manufactured either in-house or by third party partners based in the UK and internationally. The raw materials used are sourced from a broad range of suppliers – national and international.

The Silver Spoon Company nurtures good ethical business practices throughout its supply chain including its internal manufacturing facilities not only by words but by actions. We have an obligation under the Modern Slavery Act 2015, to engage with stakeholders to correct any non-conformances we observe in our supply chain. This is in line with the Policy of Associated British Foods (ABF) which is built on strong ethical foundations.

Our stakeholders include our:

- Employees
- Business partners
- Our parent company
- Suppliers of raw materials, goods and services

We endeavour to conduct our business ethically and responsibly, ensuring that throughout our business, human rights are respected and that our business practices do not have an adverse human rights impact. This is supported by our commitment to ensure compliance with the UN Universal Declaration of Human Rights.

The Silver Spoon Company also recognises the importance of ensuring that our suppliers have a contractual obligation to respect Human Rights and protect the environment as set out in our Sourcing with Integrity Policy. We strive to engage actively with suppliers to ensure there is adherence to our Sourcing with Integrity Policy by taking practical steps, including reviews and on-site visits, to share our policy and clearly explain it. In addition, we have a duty to ensure that our business and our suppliers uphold responsible sourcing practices.

They enable us to say that we know where our raw materials and products come from, how they are made and who is involved.

As part of our due diligence monitoring, we regularly assess the risks within our supply chain based on geography, raw materials and transparency. On site assessment of our suppliers are conducted randomly using technical and ethical standards which include human rights, working conditions and labour standards. We strive to ensure that wherever we operate, that our suppliers and partners comply with local legislation and regulations. We expect our suppliers to implement corrective actions if and when deviations from our Policy are observed.

We will implement and enforce systems to reduce the potential likelihood of Slavery and Human Trafficking occurring anywhere in our business. We will engage with our suppliers and partners to agree remedial actions whenever deviation from our policies and procedures is observed.

We strive to ensure that we eliminate the risk of breaching human rights in our business that may result from our products, services and operations. We will assess our progress against key metrics outlined as follows:

- Number of suppliers able to demonstrate compliance to our Policy & Code of Practice
- Number of raw materials and products that are traceable to Origin
- Number of “green” score from third party ethical audits using international audit standard of our manufacturing facilities. Such audits are based on the following criteria: human rights including slavery & trafficking; health & safety; business integrity; environment protection

This Policy Statement is made in pursuant to Section 54 (1) of the Modern Slavery Act 2015. It sets out the approach to be taken to ensure that corrective action is implemented to eliminate malpractices associated with Slavery and Human trafficking within our business.

Details of the progress made during 2018/19 on how we are tackling the risks and incidence of modern slavery in our supply chains and operations are documented in a separate report published in our website and business management system. We were able to establish that the priority areas in our supply chain are Asia and South America. Thus far we have not been made aware or identified any incidence of human rights infringements occurring either within our business or in our supply chain.

Signed:



Martin Brewis
Managing Director

Date: 15/7/2020

