

## Modern Slavery Act 2015

### Modern Slavery Act Transparency Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

ARYZTA is committed to ensuring that our practices are designed to combat slavery, servitude, forced and compulsory labour and human trafficking.

**This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for ARYZTA FOOD SOLUTIONS UK for the financial year which commenced 1<sup>st</sup> August 2018 and ended 31<sup>st</sup> July 2019.**

#### Organisational Structure

ARYZTA's business is speciality food manufacturing and distribution with a primary focus on speciality baking. We employ approximately 18,000 people across Europe, North America and APAC. We have a global annual turnover €3.9bn. To find out more about our business, please visit [Delice de France UK website](#)

#### Our Supply Chains

Our supply chain consists of relationships with external businesses for the sourcing of raw materials as well as the suppliers of services to ARYZTA.

As part of our commitment to combating modern slavery and human trafficking, our supplier approval process and due diligence will incorporate a review of the controls undertaken by the supplier. Imported products from sources outside the UK and EU are potentially higher risk in respect of slavery and/or human trafficking. The level of management control required in respect of these sources will be continually monitored.

#### Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We have put in place a Modern Slavery and Human Trafficking Policy which we will be providing to suppliers in order that they adhere to the same high standards. Our Modern Slavery and Human Trafficking Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As well as the Modern Slavery and Human Trafficking Policy we have developed the following policies to support our commitment

ARYZTA Global Employee Code of Conduct (**see attached**)

#### Due Diligence Processes in respect of Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, our Procurement Function is initiating best practice in:

- Identifying and assessing potential risk areas in our business and supply chains
- Reducing the risk of slavery and human trafficking occurring in our supply chains.

- Monitoring potential risk areas in our business and supply chains
- Protecting whistle blowers (as detailed within our Code of Conduct (Page 15), and in our Employee Handbook).

### **Supplier Adherence to our Values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we are reviewing our agreements and dealings with suppliers to ensure compliance with anti-slavery measures. We have representatives from the following departments who support this policy:

- Internal Audit
- Human Resources
- Procurement
- Quality

### **Risk and Compliance**

We will evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by identifying areas of risk.

In the event of risk we will implement mitigating strategies, such as supplier audits and spot checks.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and in our business, we will provide ongoing training to our staff through our Code of Conduct training.

### **Our Effectiveness in Combating Slavery and Human Trafficking**

We will track the following activities to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Internal Audit - once a year of:
  - Payments for minimum wage requirements
  - Training records
  - Code of Conduct Receipts

### **Further Actions**

Following an annual internal audit we will implement any recommendations according to the appropriate timelines.

**Signature:**



**Managing Director:**

**Delice De France UK**

**Date:** 04/01/2019