

SPEEDIBAKE

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Modern Slavery Act Transparency Statement - 2020

Modern slavery is a global issue that requires global action. It can occur in many different forms including, but not limited to, forced labour, child labour, domestic servitude or human trafficking. Speedibake is delivering on a planned programme of activities that limit the potential risk of modern slavery and human trafficking occurring in its own business or within its direct supply chain. The Company acknowledges the provisions of the Modern Slavery Act 2015 and commits to complying with its obligations to ensure transparency within its business activities.

Our Business

Speedibake is part of ABF Grain Products Ltd and carries out private label frozen bakery operations with over 400 direct employees, at our site in Bradford, West Yorkshire in Northern England. The business is supported by a carefully selected and licenced labour provider to meet fluctuations in demands and seasonal needs.

As part of the company due diligence process, we have:

- A Board Member and steering committee in place to oversee compliance with the Modern Slavery Act which includes representatives from Technical, HR and Supply Chain
- Periodic Compliance Reviews where progress against plan is monitored and discussed
- Speedibake Policies in place which are reviewed in line with the Policy Review Control procedure. These policies help to identify potential risk and support tackling modern slavery where it is found to occur, this includes:
 - Equal Opportunities & Dignity at Work
 - Ethical Trading
 - Disciplinary
 - Grievance & Disputes
 - Group Modern Day Slavery Remediation
 - Preventing Hidden Labour Exploitation
 - Recruitment & Selection
 - Whistleblowing
- Continued to work as a Business Partner with the 'Stronger Together' initiative with plans to complete the self-assessment Progress Reporting Tool this financial year
- Completed a risk assessment to identify the risks of modern slavery within our business and supply chain and have a Group Remediation procedure if there are any issues of compliance identified in the business or in the wider supply chain
- Reviewed all commercial contracts with our suppliers to ensure they are aware of their obligations under the terms of The Act and request that they sign up to the ABF Code of Conduct, or have an appropriate Code of Conduct in place and that they have Modern Day Slavery statements in place

Speedibake has stringent control measures in place to ensure that internal processes are continually assessed to assure consistency and compliance in implementing good practice in the following areas, on an ongoing basis:

- Management Systems
- Recruitment Process
- Labour sourcing
- Training, Awareness and Communications
- Worker records audits to identify potential risk areas
- Workplace monitoring



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- Worker engagement
- Providing access to remedy if concerns are raised by workers

As part of the above, Speedibake has introduced several activities to evaluate the businesses' compliance with the Act that includes:

- Annual auditing of the processes operated by the licenced third-party agency through which it recruits temporary labour
- Undertaking the SEDEX Self-Assessment process and reviewing SEDEX data relating to suppliers (see below)
- Undertaking SMETA Ethical Audit Training for key personnel including HR and Technical
- Reviewing 'Expolink' reports

Our Supply Chain

Speedibake continues to source most of its raw materials (ingredients and packaging) through a European supply base, however there remains a small percentage of ingredients and component materials that may have originated from worldwide origins. The supply chains in most cases are complex and often involve agents and brokers that makes total traceability and transparency very difficult to achieve.

The company will, through its ethical risk assessment and monitoring activities seek to identify those chains which have the highest risk of potential modern slavery or human trafficking. Where any potential issues or occurrences of modern slavery are identified, the Company will undertake remediation and mitigating plans on a case by case basis and will involve seeking expert advice and collaboration with other companies where necessary.

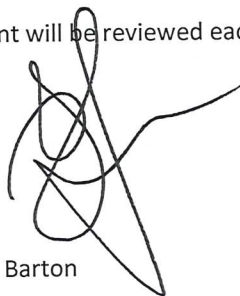
Speedibake's due diligence approach requires:

- All our suppliers to comply to the ABF Code of Conduct which is based on the Ethical Trade Initiative (ETI) base code and the International Labour Organization (ILO) convention. This is asked of new and current suppliers as part of the agreed "Terms and Conditions" and through sign-off of our ABF Code of Practice (our technical terms which are regularly reviewed).
- Our suppliers to be registered on Supplier Ethical Data Exchange (SEDEX) or a suitable equivalent.
- That we review our ethical risk assessment annually as a minimum or when horizon scanning highlights possible issues within our ingredients and packaging raw materials supply chains.
- Tier 1 Suppliers, where deemed appropriate, with high risk supply chains are required to complete a SMETA audit as a minimum every 3 year.

The information gathered through the above activities will be regularly assessed by the steering committee; the process and procedures will be reviewed annually.

This statement will be reviewed each financial year and published on the company website.

Signed:



Date: 28.05.20

Name: Steve Barton

Title: Managing Director



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