



## Modern Slavery and Human Trafficking Statement

### Introduction

English Provender Company is committed to understanding modern slavery risks and ensuring that no modern slavery or human trafficking exists within the organisation or supply chains.

This statement covers the activities of English Provender Company Ltd and relates to actions and activities during the financial year 1 August 2017 to 30 September 2018.

### About Us

English Provender Company has been a wholly-owned subsidiary of Edward Billington & Son Ltd since 1998. The Billington Group is a growing family of trading and manufacturing businesses in Food and Agriculture sectors.

By 2004 English Provender Company had grown to be a key supplier for the UK's major food retailers and moved into purpose-built facilities in Newbury. In the same year we acquired Suffolk Foods and welcomed its process expertise and wider customer base into the fold.

In 2007 we acquired another successful sauce producer, Alembic Products Ltd of Chester. This site is now dedicated to producing products in a wide variety of plastic formats, such as dip pots, sachets and stick packs.

It is our mission to create fine food for all to enjoy! We produce over 700 ambient and chilled products from mayonnaise to marinades, condiments to cooking aids in a wide range of packaging formats. We are a key supplier to food manufacturing, foodservice and retail sectors.

### Supply Chain

English Provender Company has approximately 180 suppliers who operate worldwide with a total spend of circa £45m annually. All raw materials and packaging are purchased from approved suppliers and in accordance with our agreed specifications. A robust auditing rota and process with our suppliers ensures that products are responsibly sourced and any issues identified through traceability exercises.

### Relevant Policies and Practices

English Provender Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

#### SEDEX Membership

English Provender Company is a member of SEDEX (Supplier Ethical Data Exchange) and both sites undergo third party ethical audits to ensure monitoring of ethical standards across the business. As at September 2018 over half of our suppliers are linked with us on SEDEX.

### Whistleblowing Policy

English Provender Company encourages all its workers to report any concerns related to the direct activities, or the supply chains of, the organisation. This policy details potential circumstances of wrongdoing including modern slavery and human trafficking. English Provender's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Anyone with concerns is encouraged to raise them directly to our parent Company, Edward Billington & Son Ltd. This policy is displayed as a poster on the Company's premises and can be used concurrently with the Company's grievance procedure should it be required.

### Agency Worker Practice

A proportion of our workforce is made up of temporary workers supplied via labour providers allowing us to be flexible with customer demands and seasonality. English Provender Company uses only specified and reputable agencies to source labour and verifies the practices or any new agencies before accepting workers. Recruitment agencies that supply temporary labour to the organisation are audited every six months; this audit involves a review of all recruitment processes and procedures as well as individual interviews with the agency workers themselves.

### Ethical Trading Initiative Policy (ETI Base Code)

English Provender Company has an ETI base code that details the Company's commitment to responsible labour practices and improving working conditions for employees. The ETI base code covers: freely chosen employment, freedom of association, safety, working conditions, child labour, wages, working hours, discrimination, and regularity of employment and inhumane treatment of employees. Awareness and understanding of the ETI base code forms part of the employee induction which is delivered on starting employment and every three years thereafter. The ETI base code document is also displayed as a poster on the Company's premises.

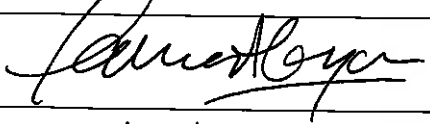
### Training

To ensure understanding and identification of high risk practices within English Provender Company key employees within the HR department at both locations have attended Anti-Slavery sessions. These sessions included understanding and awareness of the subject matter as well as identification and reporting.

### Awareness Raising Programmes

English Provender Company displays Stronger Together posters across both sites detailing the internal and external help that is available in situations of exploitation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2<sup>nd</sup> September 2018.

Signature of Managing Director	
Date	20/02/2019