

# Slavery and Human Trafficking Statement

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

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This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Hovis Holdings Limited and its subsidiary companies, Hovis Limited and Rank Hovis Milling Limited, ("Hovis") during the financial year ending 31 December 2018 to prevent modern slavery and human trafficking in its business and supply chains.

## INTRODUCTION

Hovis is an iconic household brand that has over 133 years' experience in the baking and milling industry. Our core values apply to everything we do and are centred on three key principles; quality, accountability and trust. We are proud of our heritage and our reputation and are committed to putting Hovis goodness at the heart of every day. We recognise that, to achieve this, we must adhere to the highest possible standards in everything we do. This commitment includes ensuring that people within our business and our supply chain are treated with dignity and respect and by taking proactive steps to tackle and prevent slavery, servitude and human trafficking.

## OUR BUSINESS AND SUPPLY CHAINS

Hovis is jointly owned by by The Gores Group (51%) and Premier Foods Group Limited (49%)

In 2018, Hovis operated as a baking and milling business. However, during 2018, Hovis disposed of the majority of its milling business, including (i) its grains, seeds and blends business Holgran; (ii) its bakery and ingredients business Flemming Howden; and (iii) its mills at Selby and Manchester. In addition, Hovis' Southampton mill ceased production in February 2019 and will be closed by June 2019. Hovis' mill at Wellingborough has been retained and will supply approximately 80% of flour used to produce our products, making us a fully integrated baking business going forwards.

regular operations which is sourced both directly and through reputable recruitment agencies. We recognise and respect our employees' rights to join trade unions and to bargain collectively and we adopted a collaborative approach to working with trade unions within our business.

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We have eight (8) bakeries in England, Scotland and Northern Ireland producing high quality bread and other bakery products. As detailed above, in light of the milling disposals and closure of the Southampton mill, we now have one (1) flour mill based in Wellingborough and two (2) regional distribution centres, enabling us to deliver over one million loaves every day of the week throughout the United Kingdom and Ireland.

2016

We work with over 1400 suppliers across our supply chain. Our direct suppliers supply ingredients and packaging for our products. The majority of our raw ingredients and packaging materials are sourced from suppliers based in the United Kingdom and Europe. Our indirect suppliers provide us with goods or services to support the day to day business operations, such as utilities, maintenance and office supplies.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Hovis will not tolerate modern slavery in its business or supply chain. We therefore have a number of policies, systems and controls in place to ensure that we are conducting our business in an ethical, responsible and transparent manner. All of the following policies are (or will be) readily available to employees and workers on Hovis' internal intranet system.

1. **Anti-slavery Policy:** This policy applies to all employees and agency workers of Hovis. It sets out roles and responsibilities, what behaviours constitute slavery, how to identify any instances of slavery or servitude and the procedures to follow if concerns are identified.
2. **Recruitment Procedure:** We operate a robust recruitment procedure, including conducting eligibility to work in the UK checks for all employees and agency workers, to safeguard against human trafficking or individuals being forced to work against their will.
3. **Whistleblowing Policy:** This policy applies to all employees and agency workers of Hovis. It sets out how to raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. **Safecall line:** Hovis supports a culture of openness and transparency. In conjunction with the Whistleblowing Policy, Hovis operates a Safecall line that can be contacted (by telephone) 24 hours a day, 365 days a year to allow employees and workers to report (anonymously if they wish) concerns of unethical conduct or behaviour. This therefore gives individuals a method of reporting suspected

incidents of slavery or servitude in a confidential manner. Any complaints or reports will be investigated.

5. **Code of Conduct:** This code aligns with our core values and explains the manner in which Hovis operates as an organisation and how we expect our employees and workers to behave. In particular it requires all employees and agency workers to ensure that they comply with applicable laws, rules and regulations; to act with honesty and integrity; and to treat people fairly with dignity and respect. Non-compliance with the code may result in disciplinary action being taken.
6. **Human Rights Policy:** In 2018, to reinforce the business' zero tolerance to slavery

International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. This new policy will be launched during the first half of 2019 and will be publically available on [www.hovis.co.uk](http://www.hovis.co.uk).

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## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

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Forced labour, in any form, has no place in Hovis' operations and supply chains. Hovis has an Ethical Trading Statement in place, which is based around internationally recognised code of labour practices, setting out the minimum standards we expect all of our suppliers and business partners to adhere to.

Hovis is a member of SEDEX (the Supplier Ethical Trading Data Exchange), a not for profit membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. We require all ingredients and packaging suppliers to be members of this organisation to give us visibility of their ethical performance and aide the assessment of risk in our supply chain.

To ensure that Hovis' suppliers comply with the Modern Slavery Act 2015, we include contractual 'anti-slavery' provisions in our agreements that require our suppliers to confirm to us that they have and continue to take steps to prevent modern slavery within their business and supply chain and to report any incidents or suspected incidents to us.

## ASSESSMENT OF RISK

We work in conjunction with our suppliers to assess the risk of slavery and human trafficking in our supply chain and based on that assessment, and the fact that the majority of our suppliers are based in the UK and Europe, we consider the risk to be low. However, we recognise that our overall supply chain, particularly for ingredients, is complex with a global reach; therefore, we acknowledge that we must remain vigilant and are committed to continually improving our practices to combat slavery and human trafficking.

We have considered the risk of slavery and human trafficking in our operations, including via the use of agency labour, and we consider the risk to be low due to the robust recruitment and on boarding processes that we, and our recruitment agencies, abide by. Nonetheless, we keep our processes and procedures under regular review to ensure that they are consistently applied and adhered to.

## TRAINING

Hovis underwent an extensive role out programme when the Modern Slavery Act 2015 came into force to ensure that the business' policies and processes were understood and embedded within our organisation.

In 2019 we intend to develop and implement a comprehensive training programme with the support of specialist external consultants to continue to raise awareness of slavery and trafficking and our policies and procedures. The training will initially be directed towards employees within the senior leadership team across our sites

procurement and purchasing of raw materials.

## EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

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In order to assess the effectiveness of the measures Hovis has implemented to tackle and prevent slavery and human trafficking taking place in any part of our business and supply chain, we will use the following key performance indicators:

1. We will ensure that a minimum of 50 key stakeholders within the business undertake compulsory modern slavery training in 2019, including human resources, procurement and the senior leadership team;
2. We will review and update our Ethical Trading Statement and ensure that it is communicated to all of our suppliers in 2019 and on an annual basis thereafter;
3. We will conduct audits (either internally or using external providers) for a minimum of six (6) key suppliers identified as higher risk (due to the country of origin of raw materials in the agricultural sector) within 2019 to ensure we are increasing our oversight of such supply chains and can identify and mitigate against any risk;
4. We will implement a compulsory ethical component into our food safety and compliance audits during 2019 to address labour exploitation and ensure that suppliers are adhering to their policies and processes in practice;
5. We will devise a compliance questionnaire to be completed by all prospective suppliers to enable the business to review and better understand the steps prospective suppliers are taking to prevent modern slavery and human trafficking in their supply chains and to identify and mitigate any risk.

This statement has been approved by the Board of Directors of Hovis Holding Limited, Hovis Limited and Rank Hovis Limited on 27 March 2019.

### **Nish Kankiwala**

Director and CEO of Hovis Holdings Limited

Date: 27/03/2019



### **George Idicula**

Director of Hovis Limited

Date: 27/03/2019



### **Lawrence Watson**

Director of Rank Hovis Milling Limited

Date: 27/03/2019



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Hovis Limited is a company registered in England and Wales with Company Number 08846838. VAT No. 183299473

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