
MODERN SLAVERY ACT COMPLIANCE STATEMENT 2017/18

This Statement is published in accordance with s. 54 of the Modern Slavery Act 2015. It sets out the steps which Warburtons Limited ("Warburtons") has taken during the period 1st October 2017 to 30th September 2018 ("FY 17/18") to prevent modern slavery and human trafficking in its operation and its supply chains.

Warburtons Business and Supply Chains – An Overview

The structure of our business has not changed since the previous financial year. We are a leading grocery brand in Britain, selling wrapped bakery products and a variety of Free From bakery products. We have 12 bakeries and 14 depots all operating within Britain, providing our customers with a daily supply of fresh, top quality products, all made in Britain.

We have over 4,500 employees in our workforce and work with over 2,000 suppliers across our supply chain.

We manage our supply chain depending on the nature of suppliers. We have direct suppliers (suppliers who provide ingredients and packaging for our products) and indirect suppliers (all other suppliers, including the provision of building and engineering services to office supplies, uniforms and utilities).

We have continued to focus on our own operations and work with some of our first tier suppliers to assess the key risk areas for our business. Having done that further analysis of our supply chain we believe the risk of modern slavery in our operation and in our first tier supplier base is low. Our overall supply chain extends worldwide and is multi-layered and therefore we continue to look at ways of assessing the entire supply chain in collaboration with our first tier suppliers and managing modern slavery risk within it.

Policies in relation to Slavery and Human Trafficking

We build our business on the basis of five core values – family, ambition, responsibility, quality and care - which shape everything we do, both inside and outside the company. As such, we are committed to the requirements of the Modern Slavery Act and will continue to implement effective systems and controls to manage modern slavery risks in the supply chain.

We have a Supplier Code of Conduct and our Ethical Principles, each of which include our requirements for worker rights and raise awareness of modern slavery and human trafficking.

We have reviewed each of these documents and are satisfied they are sufficient to address the issues amongst our supply base and our own workforce.

In addition, we have a number of general policies and procedures that support our business compliance requirements as well as our ethical approach.

We will continue to review and refine all these policies as modern slavery issues and practices develop.

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Warburtons Due Diligence Process in relation to Human Trafficking in our Business and our Supply Chain

We continue to use the globally recognised platform, Sedex, to assess our own business practices and those of certain key first tier suppliers in our supply chain.

The Sedex SAQ assessment is supported by our Supplier Code of Conduct. During this financial year, we have issued this to all our existing direct suppliers and requested confirmation of acceptance. We are monitoring the responses we receive to this. In addition, all new direct suppliers will be required to accept our Supplier Code of Conduct and/or confirm they operate their own to at least the same standard.

We are satisfied that our existing employment practices and procedures comply with legal requirements in relation to modern slavery and human trafficking.

Parts of business where there is a risk and steps taken to assess and manage

We continue to monitor higher risk areas more closely and are in conversation with our relevant first tier suppliers to understand how they manage risk further down the supply chain. We risk assess by product type and geographical supply and identify any required actions. From our assessments to date, we consider the risk of modern slavery issues in our immediate first tier supply chain to be low but continue to work with suppliers to increase awareness to identify issues within their supply chains.

Training and capacity building of staff

We continue to have a core team of cross functional specialists who work in partnership with our suppliers to continuously improve our working practices to suit the flexible demands of our complex supply chain.

This statement has been approved by the management board of Warburtons and signed by Neil Campbell, Managing Director.



Neil Campbell
21st March 2019