



Woolley Brothers (Wholesale Meats) Ltd

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

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.

We are committed to improving our practices to combat slavery and human trafficking.

ORGANISATIONAL STRUCTURE

Woolley Brothers (Wholesale Meats) Ltd is a family owned business consisting of both an Abattoir and Cutting Plant based in Sheffield, employing approximately 130 staff. Woolley Brothers aim to achieve the highest possible standards and as a result are now supplying large retailers such as M&S and Morrisons.

OUR SUPPLY CHAINS

Woolley Brothers source their materials from approved suppliers only, cattle/ packaging/ raw materials etc. are audited either by our own auditors or by a third party auditing body such as BRC, Red Tractor.

OUR POLICY 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. In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place this designated Modern Slavery and Human Trafficking Policy.

Our Modern Slavery and Human Trafficking Policy is purposely made to demonstrate 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.

Woolley Brothers arrange to be audited unannounced at a minimum of every two years by Sedex (Supplier Ethical Data Exchange). Sedex is a membership organisation for businesses committed to the continuous improvement of ethical performance within their supply chains. Woolley Brothers are also members of the Ethical Trading Initiative (ETI) and clearly communicate this through staff inductions and signage throughout site. All staff are made fully aware of the ETI base code and what it means.

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 have put in place a supply chain compliance programme which consists of Contractor and Supplier Questionnaires, Supplier audits and Farm inspections.

The company intends to review its agreements and dealings with suppliers annually to ensure compliance with anti-slavery measures.

COMPLIANCE TEAM

We have dedicated compliance team, which consists of involvement from the following departments:

Megan Young - Technical Manager

Ann Young – Training and Health & Safety Manager. Ensuring Sedex and ETI compliance

Steven Woolley – Managing Director & Human Resources

Gary Blockley – Sales Executive & Human Resources.

The compliance team is led by Megan Young

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have put in place the following systems:

DOC REF	WBQ.PO.015	ISSUE DATE	05/06/2023	AUTHOR	M. Young
DOC NAME	Modern Slavery & Human Trafficking Policy	VERSION No	03	AUTHORISED BY	Director



Woolley Brothers (Wholesale Meats) Ltd

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

- Supply Chain Risk Assessments - Identify and assess potential risk areas in our supply chains.
- Pre- supply verification and audits – ie Contractor Questionnaires, Supplier Audits.
- Farm Guidance and Inspections
- Whistle Blowing Policy – for confidential reporting by workers and independent investigation of concerns.
- ETI Base Code
- Employee Handbook – emphasises our values and outlines the rights and responsibilities for our employees.
- Zero tolerance policy on discrimination, harassment, bullying and victimisation.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide the following training to our staff:

- Multi lingual modern slavery awareness materials e.g. posters.
- Modern Slavery awareness training for all colleagues during induction to the company.

We also will require our business partners to provide training to their staff and suppliers and providers.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We like 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, we do this by annually reviewing our Modern Slavery Policy and by discussing Modern Slavery and Human Trafficking as a topic in our monthly Management Meetings using appropriate KPIs to set aims and objectives where needed.

Steven Woolley

DOC REF	WBQ.PO.015	ISSUE DATE	05/06/2023	AUTHOR	M. Young
DOC NAME	Modern Slavery & Human Trafficking Policy	VERSION No	03	AUTHORISED BY	Director