

Weetabix Limited - Slavery and Human Trafficking Statement

1. Introduction

This statement is made by Weetabix Limited (**Weetabix**) for itself and its parent company, Westminster Acquisition Limited (**WAL**) (Weetabix and WAL, together defined as **Group**). It is a statement made in accordance with section 54 of the Modern Slavery Act 2015 (**the MSA**) and covers the financial year from 1 October 2020 to 30 September 2021 (**the Financial Year**).

Weetabix and WAL are companies that strive to do things in the right way and we recognise our responsibility to be aware of the risks of modern slavery and human trafficking within our own Group and supply chain.

2. Background

Our Northamptonshire production units currently export to over 80 countries around the world. We employ around 1,050 staff members internationally, with the majority based within the UK, undertaking a range of roles including marketing, sales, manufacturing, finance, IT, HR, strategy and export. We also have employees undertaking sales and marketing roles based in Spain, UAE, China and the Netherlands.

We use agency labour in our UK manufacturing areas, which is sourced through reputable recruitment agencies. We also have third party suppliers on site who provide contractors. We outsource certain services where specific expertise may be required and a number of non-key activities, such as engineering support, site maintenance and logistics are also outsourced. Appropriate right to work checks are conducted in partnership with those agencies.

All of the wheat for our core Weetabix biscuit range is grown within 50 miles of our Burton Latimer production units by our Weetabix Growers Group, which is formed of around 350 approved farmers dedicated to best practice and responsible production.

Within our contracted direct supply chain, there are 55 different raw material and co-managed suppliers, 19 contracted packaging suppliers and 18 co-manufacturing suppliers. Our indirect supply chain currently consists of 842 active suppliers.

We have carried out a review of our direct supply chain and have concluded that the risks of modern slavery and human trafficking are low. However, we acknowledge that we must remain vigilant to the risks and ensure that our suppliers understand and play their part in ensuring that modern slavery and human trafficking does not take place in our organisation or in our supply chains. This message is reiterated to our suppliers via our supplier assessment and relationship management programme.

We have published our second Sustainability report which details our commitment to responsible production at every step of the journey from field to breakfast table.

We continue to work with other supply chain bodies to ensure our ingredients are supplied to recognised sustainability standards. All cocoa that we source is 100% UTZ certified sustainable and we have maintained our Roundtable on Responsible Palm Oil (RSPO) certification. We will be looking to support sustainable soya with the Round Table for Responsible Soya (RTRS) and will be reviewing our carbon footprint for wheat in the next financial year.

To find out more about what we do, please go to <https://www.weetabixfoodcompany.co.uk>.

3. Relevant Policies and Contracts

To reinforce our commitment to combating slavery and trafficking, we have implemented the following policies, which set out our zero-tolerance approach to modern slavery, both within our own operations and our supply chain:

- (a) We have superseded the Responsible Sourcing Policy with our Ethical Trading Policy which applies to all our operations and those in our supply chain. This Policy makes specific reference to our zero-tolerance stance on modern slavery.
- (b) We have published guidance to our employees through our internal Anti-Slavery Policy available on our intranet, which applies to all those working for us or on our behalf (and which includes contractors and agency workers).
- (c) We have a robust supplier set up process when engaging with new suppliers, contractors and business partners to ensure that they are aware of and will adhere to our Ethical Trading Policy and to assess the likelihood of slavery or trafficking existing in those organisations and what measures are already in place to combat those risks. Our supplier set up process is currently under

review to drive further efficiency in pursuit of our change for even better strategy.

- (d) We have a Whistleblowing Policy in place and a Speak Up Line.
- (e) We put in place confidentiality agreements containing Anti-Slavery clauses with potential suppliers prior to working with them.
- (f) Our supplier contracts contain comprehensive Anti-Slavery clauses, and we have framework agreements or terms & conditions in place with 98% (measured against spend) of our direct raw materials and packaging suppliers.
- (g) Our ultimate parent company launched a global Code of Conduct in 2018 which fits with our principles and values here at Weetabix. This Code provides support to our employees in making day to day ethical decisions in addition to the policies already in place. Our office-based staff in the UK and overseas are required to complete the Ethics and Code of Conduct training annually.

In addition, we are currently working with our ultimate parent company to put in place a further due diligence tool aimed specifically at combatting money laundering and breach of US trade sanctions. This has now been launched with certain of our sister companies and anticipated to be rolled out to us later next financial year.

4. Risk assessment processes

We have considered the risk of modern slavery in our own operations and we have concluded that, on the basis that we are a UK employer subject to UK employment protections and practices and already have well developed checks and balances within our business, we have a low risk of modern slavery occurring in our own operations.

Our suppliers which fall into the following categories adhere to the Weetabix Standards, which include a requirement to abide by the Ethical Trading Initiative base code and they are strongly encouraged to consider membership of Sedex, the global organisation that helps businesses share responsible sourcing data on supply chains :-

- Suppliers of Ingredients to Weetabix
- Suppliers of Packaging Materials to Weetabix
- Those involved in the co-manufacturing, co-packing and licensed manufacture of Weetabix Brands.

We have considered the risk of modern slavery occurring in our use of external labour via employment agencies and our direct suppliers. Given the organisations that we work with and who also have a zero-tolerance approach to modern slavery and the existing checks

and balances that we apply in these areas, we have concluded that the risks of modern slavery are low in this area.

5. Due diligence processes

In order to prevent slavery and trafficking in our business and supply chains, we have taken steps to update and improve our supplier due diligence process with terms and conditions in place with suitably robust anti-slavery clauses. For certain of our procurement activities, a competitive tender process is required, and which requires at the pre-qualification questionnaire stage that any potential supplier is compliant with the MSA before the organisation can progress to the next stage of the procurement process. Compliance with applicable law is part of our scoring criteria.

Our standard non-disclosure agreement also includes an undertaking that any potential entity with whom we might work will also comply with the MSA.

6. Training

To raise awareness of slavery and trafficking, and of our policies and procedures, we have an established induction and continuous learning approach to training employees in this area using our compliance calendar and our Weetalearn platform.

We have dedicated compliance modules covering key compliance areas, including Anti-slavery, Anti-bribery, Ethics and Code of Conduct. Our Code of Conduct training runs annually for all graded employees.

7. Measuring effectiveness – performance indicators

In order to monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, we will use the following performance indicators for the financial year ahead:

- Completion rates for the mandatory Code of Conduct training completed by office-based staff. In 2021 completion rates were 96%.
- We will monitor and categorise concerns reported to us (either via our Speak Up line or any other channel). Since inception in 2018, no concerns have been reported in relation to modern slavery and/or human trafficking.

- We will ensure that we continue to have terms and conditions in place with our direct and indirect supply chain that require MSA compliance as a key term.
- We will ensure that we have terms and conditions in place with our co-manufacturing partners.

As referenced in this statement, we will monitor the need for further action to be taken and other key performance indicators to be implemented as we continue our risk assessment and due diligence activities.

This statement has been approved by the Weetabix board of directors who review this statement and update it annually.

Signed on behalf of the Board of Directors by Sally Abbott

January 2022