Modern Slavery Policy Statement – 2020

Policy Statement

During the past year, businesses and organisations have been affected by the disruption caused by the Covid-19 pandemic, creating an environment which allows modern slavery to become even more prevalent.

Dovecote Park remains committed in its aim that we play our part in ensuring there is no slavery or human trafficking within our business and our supply chain. We will reinforce our commitment to help eliminate the opportunities for modern slavery to exist by ensuring that everyone that works for Dovecote Park is treated with the basic values of dignity and respect.

Modern slavery, and the associated consequences continue to be one of the most challenging human rights issues within the UK. It is estimated that over 20 million individuals globally, the majority female, are victims of this epidemic.

Organisation Structure and Supply Chains

Dovecote Park is a dedicated and privately-owned meat processing plant supplying beef, veal and venison to Waitrose Supermarkets. Our supply chain extends from the farmer rearing the cattle to ingredients and packaging. The organisation currently operates solely within the United Kingdom (UK), although some of our suppliers are not based in the UK.

High-risk Activities

We still hold the belief that none of our activities or those of our suppliers are at a high risk of slavery or human trafficking, although we will continue to be vigilant and not become complacent or ignore the fact that this can occur and we will continue to monitor and take appropriate action, where necessary.

Responsibility

Whilst we feel that everyone that works for Dovecote Park has a responsibility for the organisation's anti-slavery initiatives, these will be lead as follows: -

- **Policies** – The Board of Directors are responsible for the drafting and reviewing of the company's policy on an annual basis.

- **Risk Assessments** - The Purchasing Manager in conjunction with the Technical Manager will be responsible for ensuring compliance of all suppliers with the exception of Livestock which will be the Responsibility of the Cattle Procurement Manager in conjunction with the HR Manager. They will jointly undertake any investigations and due diligence required to ensure compliance or where there is a suspicion of any breaches under the Modern Slavery Act.
- **Training** - All senior managers, and the Purchasing Manager have attended training in the Modern Slavery Act. Producers receive training based on the Stronger Together workshops at Producer open days.

Due Diligence

As a minimum, we expect both ourselves and our suppliers to comply with all applicable laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically.

We will continue to conduct risk assessments on all Livestock Producers to the business. In addition, the Responsible Sourcing Policy (issued to all existing and potential producers) will be amended to incorporate questions relating to the identification of any practices, that might indicate breaches of the Modern Slavery Act.

Relevant Policies

Dovecote Park operate strict adherence to the Ethical Trading Initiative Base Code (ETI Base Code). This is founded on the conventions of the International Labour Organisation and is an internationally recognised code of labour practice. The company is also a member of Sedex, the Supplier Ethical Data Exchange which is a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains and monitors adherence of all members against the principles of the ETI Base Code. Dovecote Park require all suppliers (with the exception of Livestock) to be Sedex registered.

The organisation uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency before accepting workers and continues to carry out periodic audits to ensure continual compliance. We will continue to review and update our own practices in line with such organisations as the GLAA (Gangmasters & Labour Abuse Authority)

Further developments

We understand that it is difficult to establish where individuals are being subject to modern slavery, the early warning mechanisms we implemented and that are still in place will assist us in identifying possible abuses, these include;

- **Salaries** – Payments being diverted from individuals and paid to a third party using cash or cheque or being paid via the same bank account
- **Accommodation** - Multiple occupancy at the same address
- **Statutory rights** – lack of understanding of their basic statutory rights such as entitlement to sick pay, holiday pay and other benefits;
- **Fees and Rates** – Very low agency rates;

- **Physical signs** - individuals showing signs of physical or psychological abuse; including unusual behaviours

Training

The organisation continues its awareness programme -

- Display posters in noticeboards at both sites drawing attention to Modern Slavery
- Arrange for all new cattle producers to be issued with information produced by Closer Together to be displayed on farms.
- Working in conjunction with Waitrose suppliers (HR team) to implement measures to raise awareness amongst producers.
- Livestock Field staff have attended the Stronger Together Workshops.
- Induction for all new employees contains reference to Modern Slavery and shows the 10-minute video, Tackling Modern Slavery.

Continued Actions

- All farm producers have been issues with a worker code of practice against which they will be audited annually.
- The audits commenced in August 2017 and the results risk assessed as low, medium or high.
- All ingredient and packaging suppliers are Sedex registered.
- Labour providers to the factory are audited twice a year, and must all be registered with the GLAA.
- HR Department checks that the labour providers are registered using the GLAA on-line checking facility.

Signed by:



Andrew McAllister
Managing Director
On behalf of the Board of Directors