BROWNS FOOD GROUP

MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2022

Introduction

This statement relates to actions and activities during the financial year 1st January 2022 to 31st December 2022.

This statement is made in accordance with Section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that the Company has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place anywhere within our business or supply chain. The Company has a zero-tolerance approach to modern slavery. Modern slavery encompasses human trafficking, slavery, forced labour and domestic servitude.

Board Approval

The Browns Food Group Directors have directed that this Policy be established and maintained at all sites within the Group, to ensure that a consistent approach is maintained by all levels of management when implementing this policy.

This statement has been approved by the Board of Directors and signed by the Chief Executive Officer, who will ensure that it is reviewed and updated annually.

Signed:



Wayne Godfrey
CEO, Browns Food Group

24th January 2023

Browns Food Group

Head Office
Kelloholm Industrial Estate, Kirkconnel, Dumfriesshire DG4 6RB

Company Reg No.
236133 Scotland

www.brownsfoodgroup.com

Tel: 01659 66405

Our Business and Supply Chain

Browns Food Group is a privately owned family business employing approximately 1,300 colleagues across our operations. Browns Food Group operates from eight manufacturing sites supplying the major supermarkets, food service, business to business and independent retailers in the United Kingdom, with additional locations supplying storage and distribution services throughout the United Kingdom. In 2022, Browns Food Group purchased Scotland's largest pig abattoir, providing the opportunity to process high welfare, local pork, internally to their own manufacturing sites as well as externally to retail, foodservice and wholesale sectors. Additionally, Browns Food Group provides worldwide raw material sourcing, import/export services which extends to import licencing services.

The scale of our operation and our people allows us to react quickly to the ever-changing demands of the consumers. We are committed to ensuring the safety and welfare of all those employed by the Company, agency workers, suppliers, contractors, consultants and business partners.

We are committed to communicating openly and transparently with all stakeholders that Browns Food Group does not tolerate slavery, forced or trafficked labour and to ensure that our zero-tolerance approach is shared by everyone we work with by risk assessing our own operations and supply chain.

Our Policies

Our Modern Slavery Policy

As an integral part of our commitment to human rights, we work to ensure that our business, partners and associated supply chain adhere to the highest standards of behaviours and care. We aim to proactively identify and tackle all forms of slavery and human trafficking. We ensure a consistent approach within our own operations and our supply chain and have established a structure that will enable us to meet our commitments.

Policies

Browns Food Group operates a number of internal policies to ensure that we are conducting our business in an ethical and transparent manner. These include:

- Anti Slavery / Preventing Hidden Labour Exploitation Policy, which sets out our stance on modern slavery and human trafficking and explains how employees can identify any instances of this and where they can go for help and guidance.
- Recruitment & Selection Policy which includes robust eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy that allows all employees to know that they can raise concerns about how they or their colleagues are being treated, or practices within our business or supply chain without the fear of reprisals.
- Ethical Policy which demonstrates the Company's commitment to implementing the principles of the Ethical Trading Initiative Base Code.
- Anti Bribery & Corruption Policy which outlines the Company's position on preventing and prohibiting bribery and corruption, in accordance with the Bribery Act 2010.
- Equality, Diversity & Inclusion Policy which encourages equality, diversity and inclusion in the workplace and creates a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all.

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Values

At Browns Food Group we are proud to be a values and competency led business. Our values and competencies are reflected in our working practices and policies, and underpin everything we do. Our five core values describe how we work together and the behaviours we expect from everyone who works at or with Browns Food Group

Our values are: HEART

H*onesty* – truthful and honest in all we do
E*nvironment* – provide a safe working environment for all and strive to minimise waste
A*ction* – positive and "can do" attitude
R*esponsibility* – take responsibility for our own development and constantly learn and develop
T*eam* – work together to grow the business

In addition, our competencies lead us in the manner in which we expect all our employees to behave and act.

Due Diligence

Browns Food Group undertakes due diligence when considering taking on new suppliers, and in addition, existing suppliers are regularly reviewed. Our due diligence includes:

- Mapping our supply chain to glean product or geographical risks of modern slavery and human trafficking
- Regularly reviewing all aspects of our supply chain based on the supply chain mapping and supplier approval and monitoring procedure.
- Using SEDEX, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular. Suppliers are requested to be on SEDEX and if not must provide a written statement to confirm that they do not have any form of slavery or human trafficking.
- Placing sanctions on suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

In addition to the above, as part of our contract with suppliers we require that they confirm that:

- They have taken steps to eradicate modern slavery and human trafficking within their business.
- They hold their own suppliers to account on modern slavery and human trafficking.
- They pay their employees at least the national minimum wage / national living wage (UK based suppliers).
- They pay their employees any prevailing minimum wage applicable within their country of operations (International suppliers).
- We may terminate the contract at any time should instances of modern slavery or human trafficking come to light.

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Assessing & Managing Risk

Browns Food Group are aware that there may be a risk of modern slavery or human trafficking within our supply chains, however we believe the risk is mitigated as a result of the policies and procedures we have in place as well as the knowledge and skills of our employees.
We believe that the highest risk for modern slavery occurring is within our raw material supply chain. Browns Food Group maintains an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier, this includes site audits and a self-assessment questionnaire that has specific questions relating to modern slavery. Finally, as a food manufacturer we can use agency staff at some of our sites to cope with peaks in demand.

KPI's

Browns Food Group have agreed several KPI's which are used to monitor the effectiveness of the steps that we have and are taking to ensure that modern slavery and or human trafficking are not taking place within our business or supply chain.

1st January 2022 – 31st December 2022

- No reports were received from employees, the public or external agencies to indicate that modern slavery practices have been identified anywhere relating to Browns Food Group.
- No whistle-blower cases related to modern slavery issues were received.

Training

Browns Food Group requires all management, HR and procurement teams and all new employees joining the Company to complete training on modern slavery as part of their induction programme.

Covered in the induction programme:

- How to identify the signs of slavery and human trafficking including the ILO's 11 indicators of forced labour; abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions and excessive overtime.
- What steps to take if slavery and human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available through the Modern Slavery Helpline, Gangmasters Licensing Authority and Stronger Together programme.

Awareness Raising Programme

As well as training, Browns Food Group has raised awareness of modern slavery issues by placing multi-lingual posters across our sites. In addition, we refresh modern slavery training including the Stronger Together video at every induction refresher.

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