

Modern Slavery Statement

Financial Year Ending 31st October 2024

Modern Slavery Statement

Silbury Marketing Ltd ("Silbury") supports in its actions the Modern Slavery Act 2015, in the areas of human and labour rights, environment and anti-corruption. We perceive this as a powerful platform for our activities within sustainability and ESG.

We are committed to operating ethically, transparently, and with integrity in all aspects of our business. We recognise our responsibility to uphold human rights and actively work to prevent modern slavery and human trafficking within our organisation and throughout our global supply chains. Our published code of conduct provides more details on how we put our plans into action, with an annual ESG report published (from 2024), providing details of our progress.

Silbury employs c40 colleagues based in Banbury, Oxfordshire in the UK. We are a supplier of food ingredients, sourcing a wide range of products from trusted partners across Europe, Asia and the Americas. Our global sourcing model means we are acutely aware of the risks associated with labour exploitation, especially in agricultural and food production sectors.

We outsource our payroll function to ensure we are up to date with the regulations such as National Minimum Wage. Salaries are paid into named bank accounts. We do not employ casual staff or pay wages in cash. When required, temporary staff are found using a bona fide employment agency. Silbury are also certified as complying with the Workplace Pension directive, another check on our employment.

Silbury are registered members of SEDEX, a global membership organization, to manage our performance around labour rights. We require our suppliers to also become registered.

Company registration number: ZC1026259
Company site reference: ZS1063654

At Silbury, we have integrated Environmental, Social and Governance (ESG) into both our strategy and business operations, with a dedicated sustainability manager leading this workstream across our organisation. We have robust systems for managing food safety, quality, legality and integrity through our supplier approval procedures, with clear communications in our interaction with stakeholders.

Ethical Trading and the ETI Base Code

We are a proud supporter of the Ethical Trading Initiative (ETI) and are committed to implementing the ETI Base Code, which is founded on the conventions of the International Labour Organization (ILO) and is an internationally recognised code of labour practice.

We believe that everyone who comes into contact with our business, whether directly or indirectly, should have a great experience. We therefore have some minimum standards which we expect all our suppliers and partners to adhere to as a pre-requisite for doing business with us.

The ETI base code is our minimum standard of expectation of supplier compliance : https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Base%20Code%20%28English%29.pdf.

Due Diligence and Risk Assessment

We conduct ongoing risk assessments of our supply chains and prioritise engagement with suppliers in high-risk regions or sectors. Our supplier approval process includes evaluating compliance with labour standards and ethical practices. Where necessary, we work with third-party auditors to assess working conditions on-site.

Training and Awareness

To strengthen our internal capabilities, we provide training to key staff involved in procurement and supply chain management to identify and address potential risks of modern slavery. We also encourage our suppliers to train their own workforce and management on labour rights and ethical practices.

Reporting and Accountability

Silbury ensures good working relationships with all our supply partners, promoting awareness of the requirements of the Modern Slavery Act 2015 within their own supply chains. We have worked with the majority (based on turnover and volume) of our UK and EU partners for more than 30 years. Our expectation is that all employees, suppliers, and business partners report any concerns related to modern slavery or unethical behaviour. Concerns can be raised confidentially via our whistleblowing mechanism. Any non-compliance will be investigated thoroughly, and we will take corrective action, including terminating contracts where necessary.

Continuous Improvement

We are committed to continuous improvement in our approach to tackling modern slavery. In the coming year, we aim to expand our review of modern slavery mitigation, through strengthening and monitoring processes, providing enhanced transparency throughout our supply chains.

Our last Financial Year year-end was 31st October 2024

Signed

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