

Modern Slavery Statement (2025)

Délifrance (UK) Ltd strives to be a socially responsible corporate citizen. Through our managers and through our people, we are committed to:

- promoting protection of the environment
- supporting charities and local communities
- promoting equal opportunities
- ensuring safe and efficient working practices
- working with suppliers and customers who uphold similar values.

To achieve our goal we will continue to take steps to confirm that there is no Modern Slavery or human trafficking taking place within any element of our business. This will include, but is not limited to, forced labour by such means as: physical/sexual violence; intimidation or threatening behaviour; withholding or diverting of wages; abusive working conditions; excessive or compulsory working hours or overtime; abuse of, or otherwise taking advantage of, vulnerable workers.

In 2023-24, Délifrance Group were delighted to be awarded Committed Status by ECOVADIS. ECOVADIS are a globally recognized assessment platform that rates businesses' sustainability based on four key categories: environmental impact, labour, and human rights standards, ethics, and procurement practices. In 2024, Délifrance (UK) Ltd were awarded Great Place to Work status following the survey of our employees and the external benchmarking of our results against many other employers across the world. Great Place to Work status is a globally recognised and research-backed verification of great employee experience.

In 2024-25, we took the following actions on our Modern Slavery agenda at Delifrance:

- Introduced a new Sexual Harassment Policy that set out our zero-tolerance approach to sexual harassment, the standards of behaviour we expect from everyone working at our sites and the steps we will take to address any breaches of the Policy. This was issued to all colleagues.
- Ran ACAS-led Sexual Harassment training for all line managers to ensure that they are aware of their responsibility for creating a work environment free from sexual harassment and where they understand how to tackle any breaches of the Policy.
- Developed and delivered an in-house face-to face Sexual Harassment Training programme for all colleagues to ensure they know and understand their part in creating an environment free from sexual harassment and what to do, if they experience behaviour that they find unacceptable.
- As part of the Vivescia Group, we have a strong Values framework that we have worked to embed in all levels of the organisation to drive positive behaviours in Délifrance (UK) Ltd. We designed and delivered a face-to face Values-based training programme for all colleagues that sets out our commitment to Acting Together, Working for the Long Term, Being Genuine and Being Entrepreneurial.
- Introduced a Child Labour and Young Person Policy that stated our commitment to preventing and addressing Child Labour and protecting the rights of Young Persons in relation to our business. We stated that we will not employ individuals under the age of 18. The Policy sets out how we would remediate any breach of the Policy. It also contains a copy of the Delifrance Group Charter for Human Rights and Labour Standards.
- We have seen a significant and sustained reduction in the amount of excessive hours working at both our Southall and Wigston sites. To support this, our Occupational Health professional conducted a Risk Assessment of Excessive Working Hours at our Southall factory.
- We are supporting charities through the introduction of a Charity Match Funding Policy that means we match up to £1,000 per annum per employee of fund-raising. They must be registered charities and not have political or religious affiliations.
- As part of our commitment to the environment, we have created the position of Environment Manager. This role is a key contributor to Delifrance's Environmental and Sustainability agenda, leading the review and development of the Company's Environmental Management policies and systems for the UK sites. Their objective is to reduce the Company's environmental impact through continual monitoring and audit and influencing and engaging our key stakeholders.



Throughout the period July 2025 to June 2026, we plan to undertake the following:

People

- Continued compliance with our strict employment policies covering recruitment / bribery & corruption / health & safety / harassment and bullying.
- Conduct a Sexual Harassment Survey for all colleagues and produce a risk assessment based on the results which will enable us to establish the effectiveness of the Sexual Harassment Policy and Training.
- Continue to ensure that all personnel employed directly by Delifrance (UK) Ltd are paid at an appropriate rate in line with the National Living Wage and overtime payments are in line with the ETI base code.
- Continue to monitor working hours to ensure they are not excessive, and personnel are given rest days in accordance with the ETI base code. Incidents of excessive working are reviewed when identified.
- Continue to source temporary employees from a GLA-approved agency and carry out regular audits of the agency to ensure that these employees are being paid at rates in line with the National Living Wage and have no unfair or unnecessary deductions.
- Continue to be members of SEDEX and undertake regular third-party audits of ourselves, at appropriate frequencies, to ensure that we are complying with best ethical practices.
- Continue to empower the voice of our workers through Engagement Surveys and Action Planning, Involvement Forums with Worker Representatives and Trade Union representatives, Town Hall Meetings for all colleagues and our Delifrance Newsletter. We will raise awareness of Modern Slavery through these media. We include agency workers in our Engagement Survey.
- Continue to recognise the higher level of vulnerability of agency workers and reduce our dependence on agency labour across both sites by increasing the number of permanent Production-based employees. Where possible, we are doing so by offering permanent contracts to agency workers.
- Signpost and promote our Whistleblowing Policy and how to access this at all our sites.
- Broaden our Equal Opportunities Policy to include an "Equity Approach" that is tailored around the needs of individuals.
- Embed our Values programme by creating further behaviour-based training for all colleagues based on Delifrance's Leadership Principles. This training will be delivered in house. It will set out how we can deliver our Values at work and make it clear that these Principles apply to all.
- Continue to promote Diversity and Inclusion through the design and roll out of LGBTQIA+ training for all managers and employees

Training

- Continue to brief all new personnel about Modern Slavery and human trafficking during their induction to the business and promote the various routes for confidential whistleblowing. This requirement is incorporated into periodic refresher training for all employees every 3 years.
- Continue to communicate the Whistleblowing number via Delifrance News, Town Hall Briefs and Involvement Forum meetings as well as via Noticeboards and the Vivescia Website. It is also included in the new Employee Handbook that has been issued to all new and current employees.
- All internal managers and supervisors have been trained in the signs of Modern Slavery / human trafficking and we have continued to develop our internal training plans to ensure awareness of Modern Slavery to all employees, enabling everyone to identify potential signs and react accordingly. This training is refreshed every 3 years.

Suppliers

- Continue to engage with all suppliers to ensure that our total supply chain is actively targeting the identification and elimination of Modern Slavery and human trafficking.
- In the past year, we have carried out a review of all UK suppliers to ensure their compliance with Modern Slavery regulations through SEDEX. This is in progress for our non-UK suppliers. We are continuing to explore the SEDEX and ECOVADIS systems to identify ways that they can give us a deeper insight into any potential Modern Slavery / human trafficking risk within our supply chain and enable us to take appropriate steps to eliminate occurrence or risk of occurrence as necessary.
- Where suppliers flag as potentially at risk from a Modern Slavery perspective, we work with them either directly or via a third-party auditor to improve this area. If they were unable to do this, we would look to source an alternative supplier.

Niall Cogan



General Manager – Délifrance (UK) Ltd.

July 2025

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