

Definition

Modern Slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our policy and expectations, in line with the Modern Slavery Act 2015, of ourselves and our suppliers, producers and trading partners is that we have a zero-tolerance approach to any such activity.

We are committed to acting ethically and with integrity in all our business dealings and relationships.

Colleague Training and Responsibilities

Our policy is available for all Colleagues and is expected to be read and understood by all Colleagues that interact with the highest risk areas in relation to modern slavery. We currently deem these high-risk areas to be our colleagues (including the use of agencies), our supply chain and our contractor base.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working with us. Colleagues must not engage in any activity which could breach this policy. Colleagues must and are encouraged to notify a member of the Board or Executive Team as soon as possible if they believe, suspect, or have concerns, that a conflict with this policy has or may occur.

Key stakeholders are trained on a periodic basis, when required by new colleagues or any time deemed necessary on the statutory requirements from a Modern Slavery perspective. This is done in conjunction with our online learning partner.

Consequences of Non-Compliance

Any colleague who breaches this policy will face disciplinary action. Moreover, we will seek to terminate our relationship with individuals and organisations working on our behalf if they are found to be in breach of this policy.

Within our business we can be confident that our internal systems, controls, and policies are strong enough to ensure that we are compliant with the Modern Slavery Act. In addition to this we aim to act quickly in identifying and managing any concerns or suspicions of slavery or human trafficking.

Supplier Contracts

We are committed to using suppliers that follow our high standards. Our supplier contracts (Trading Agreement) require the other party to ensure that no slavery or human trafficking is taking place within their business.

We also confirm that our exacting standards are met when working with suppliers through the use of our Supplier Approval Questionnaire which helps to ensure that we do not use unethical suppliers. Supplier questionnaires are completed as standard by Booths Brand suppliers before first supply of goods and every 3 years thereafter.

The Supplier Approval Questionnaire and audit processes will include ethical clauses, requesting that suppliers must adhere to local and national legislation with respect to terms and conditions of employment.

Where noncompliance to the supplier questionnaire is found we will work with the supplier, using a risk assessment-based approach and completing on site visits to understand the reason for noncompliance and satisfy ourselves of their suitability.

We have a programme of contact with our suppliers, producers and trading partners and it is part of that programme to check, as far as possible, that they are similarly committed to good practices in relation to their workforce and contractors.

A risk rating system has been created which covers all aspects of food safety, quality, and ethical trading. All of our branded suppliers, producers and trading partners are now audited through this process.

Future Plans and Targets

The business plans to further roll out internal training to ensure that temporary agency contractors, maintenance contractors and our retail supply chain are compliant with Modern Slavery Policy. Training will be conducted with the relevant individuals across estates, human resources, and trading.