Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out MJ Birtwistle & Co Limited's and that of its parent company, Sosamja Holdings Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 October 2023 to 30 September 2024.

As part of the meat industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of MJ Birtwistle & Co Ltd and its parent company, Sosamja Holdings Ltd:

- The butchery, processing and packing of raw meat and poultry
- The manufacture of minced meat, burgers, sausages and kebabs
- Production of flavoured raw meats
- All raw products are sourced via our approved supply chain which ensures that all suppliers have specific accreditation (BRC or GSFI equivalent)

Countries of operation and supply

The organisation currently operates in the UK but may also source products from outside the UK via our approved supplier database which is regularly audited.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Our HR Manager is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Investigations/due diligence:** Our HR Manager is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.

The organisation's policies in relation to slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking within our supply chains or any part of our business. The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the

organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Employee Code of Conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier/Procurement Code of Conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment/Agency Workers Policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

- **Ethical Trading Policy:** The organisation has an Ethical Trading Policy that all our suppliers are expected to adhere to.

- **Corporate and Social Responsibility Policy:** The Organisation recognises that we must integrate our business values and operations to meet the expectations of our stakeholders.

The organisation's due diligence processes in relation to slavery and human trafficking and in its business and supply chains

As part of our initiative to identify and mitigate the risk of slavery and human trafficking occurring within our business and supply chains, the organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery;

- evaluating the modern slavery and human trafficking risks of each new supplier [this may be part of a more general human rights or labour rights assessment];

- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;

- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;

- creating an annual risk profile for each supplier;

- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through our technical team and requiring them to implement action plans;

- invoking sanctions against 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.

The organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against relevant performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation:

- requires all HR Professionals and Supply Chain Managers to complete training on modern slavery and update this every 3 years;
- developed a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewed its existing supply chain whereby the organisation has evaluated all existing suppliers

The training about slavery and human trafficking available to the organisation's staff

As a result of the organisation's review of its effectiveness of identifying and reducing the risk of slavery and human trafficking in its business and supply chains, the organisation requires HR professionals and Supply Chain Managers within the organisation to complete training on modern slavery.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or 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, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by training at induction and then annual refresher Toolbox Talks.

The training includes:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;

- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.

CEO's signature:

Steven Woollands

Date: 24 February 2025