



**MODERN SLAVERY COMPLIANCE STATEMENT  
BAXTERS FOOD GROUP  
APRIL 2021 – MARCH 2022**

**INTRODUCTION**

Slavery, forced labour, debt bonded labour, servitude and human trafficking (which are all forms of “modern slavery”) are crimes with tragic and traumatic consequences for those who suffer such exploitation. It is the responsibility of everyone to be alert to and vigilant in identifying both the risks and the signs of modern slavery.

Baxters remains committed to continually improving our awareness and practices, working in partnership alongside our suppliers to combat slavery like practices within our supply chains. Where occurrences are identified Baxters will report the matter to the GLAA (Gang Master and Labour Abuse Authority) or Police in the UK and with the appropriate authorities within our supply chains internationally.

**ORGANISATION'S STRUCTURE**

Baxters Food Group (Baxters) is a manufacturer of fine quality food products including soups, preserves, condiments and chutneys. The Group has over 2000 employees worldwide and operations in the UK, USA, Australia and Poland. Baxters ultimate parent company is W.A. Baxter & Sons (Holdings) Limited.

The Group's global annual turnover from April 2021 – March 2022 was circa £339m.

Baxters is headquartered in Edinburgh, Scotland and has five operating sites in Europe at Fochabers in Scotland, Colchester, Burntwood and London in England, and Wolsztyn in Poland, as well as businesses in the USA and Australia.

**OUR SUPPLY CHAINS**

Baxters works with a large number of suppliers internationally, supplying products and services in the following categories;

- raw materials and part processed products for the production of food;
- packaging;
- transportation of goods; and
- contracted services.



## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business, including:

- Employee Code of Conduct
- Ethical Trade Policy
- Human Rights Policy
- Modern Slavery Policy
- Preventing Hidden Labour Exploitation Policy

We continue to review and update our practices, policies and procedures to establish the best way of incorporating our policy on modern slavery.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships. Our products should be sourced ethically and responsibly and we aim to contribute positively to those who help us manufacture them. We recognise that slavery exists worldwide and we will actively assist in the combat against modern slavery.

## **DUE DILIGENCE PROCESSES**

Our company is an A/B member of the Supplier Ethical Data Exchange (Sedex). All of our European production sites have undertaken Sedex Members Ethical Trade Audits (SMETA). These audits are designed to assess a site based on their organisation's standards of labour, health and safety, environment and business ethics. Any non-conformances highlighted by SMETA have been acted upon promptly.

We are in the process of establishing employee consultative committees at all of our European sites to provide our staff with an open and supportive forum to raise issues and provide feedback on working conditions. Our Whistleblowing Policy and hotline system enables staff to report any concerns, including about modern slavery and any other human rights violations, securely and without fear of recrimination.

Our standard terms and conditions of supply for our European business include an obligation to join Sedex and link to Baxters to provide us with access to suppliers' self-assessment questionnaires and audit information.



Baxters' expectations and requirements of those in our supply chain are made clear from our Ethical Trade and Modern Slavery Policies, compliance with which form a contractual obligation of the standard terms and conditions of supply.

## **RISK ASSESSMENT & MANAGEMENT**

Our ingredient supplier onboarding process includes verification of Sedex linking and audits are regularly undertaken with new and existing suppliers.

Improving standards in the supply chain is an ongoing process. We are continuing to investigate and consider ways to enhance our ethical audit programme and further strengthen our risk assessment, management and due diligence processes for modern slavery, within our business and in partnership with others. We are committed to making progress in this area over the next financial year.

## **MEASURING EFFECTIVENESS**

We do not currently have any key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains but this is something we intend to review with a view to introducing in the next financial year.

## **TRAINING & AWARENESS**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. New starters are provided access to our mandatory Modern Slavery e-training and staff are required to complete refresher training on a bi-annual basis.

Various channels of communication have been used across our European sites to make staff aware of Modern Slavery and what flags to look out for to alert them to possible victims of abuse. We continue to use Stronger Together videos in our induction training and display Stronger Together posters across our UK sites.

This statement is made pursuant to section 54 (1) of The Modern Slavery Act 2015 and reflects the trading period April 2021 to March 2022. It has been approved by our Board of Directors.

**Clyde Marwick**  
**Group HR & Communications Director**