



**Policy Statement: Modern Slavery Act 2015**

**Introduction:**

The Silver Spoon Company (SSC) supplies a variety of food products such as sugar (cane and beet origin), desert syrup, milkshake syrup, flour, waffle cones and wafers, under its own brand and for customers' own brand. The products are manufactured either in-house or by third party partners based in the UK and internationally. The raw materials used are sourced from a broad range of suppliers – national and international.

The Silver Spoon Company nurtures good ethical business practices throughout its supply chain including its internal manufacturing facilities not only by words but by actions. We have an obligation under the Modern Slavery Act 2015, to engage with stakeholders to correct any non-conformances we observe in our supply chain. This is in line with the Policy of Associated British Foods (ABF) which is built on strong ethical foundations.

Our stakeholders include our:

- Employees
- Business partners
- Suppliers of raw materials, goods and services

We endeavour to conduct our business ethically and responsibly, ensuring that throughout our business, human rights are respected and that our business practices do not have an adverse human rights impact. This is supported by our commitment to ensure compliance with the UN Universal Declaration of Human Rights.

The Silver Spoon Company also recognises the importance of ensuring that our suppliers have a contractual obligation to respect Human Rights and protect the environment as set down in our Sourcing with Integrity Policy. We strive to engage actively with suppliers to ensure there is adherence to our Sourcing with Integrity Policy by taking practical steps, including reviews and on-site visits, to share our policy and clearly explain it.

As part of our due diligence monitoring, we regularly assess the risks within our supply chain based on geography, raw materials and transparency. On site assessment of our suppliers are conducted randomly on an annual basis using technical and ethical standards which include human rights, working conditions and labour standards. We strive to ensure that wherever we operate, that our suppliers and partners comply with local legislation and regulations. We expect our suppliers to implement corrective action if and when deviations from our Policy are observed.

We have documented procedures which protect the human rights of our employees and prohibit poor ethical standards such as forced labour for example. The procedures are shared with our stakeholders and we engage with them to ensure that they adhere to our values and standards. We will implement and enforce systems to reduce the potential likelihood of Slavery and Human Trafficking occurring anywhere in our business. We will engage with our suppliers and partners to agree remedial actions whenever deviation from our policies and procedures is observed.

We strive to ensure that we eliminate the risk of breaching human rights in our business that may result from our products, services and operations. As part of the process we will:

- (i) map our supply chain as much as possible in order to identify the salient human rights risks and take appropriate steps to mitigate the risks
- (ii) monitor adherence to our Policies relating specifically to human rights such as
  - supplier ethical policy and code of conduct
  - Slavery & Human trafficking
  - Health & Safety
  - Environment
  - Anti-bribery & Corruption
  - Gender & Diversity
- (iii) Provide internal staff training on the Policy and the requirements

This Policy Statement is made in pursuant to Section 54 (1) of the Modern Slavery Act 2015. It sets out the approach to be taken to ensure that corrective action is implemented to eliminate malpractices associated with Slavery and Human trafficking within our business.

Details of the progress made during 2017/18 on how we are tackling the risks and incidence of modern slavery in our supply chains and operations are documented in a separate report published in our website and business management system.

**Signed:**



Martin Brewis  
**Managing Director**

**Date:**

11/12/18