



Modern Slavery & Human Trafficking

This statement sets out The Bury Black Pudding Company'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.

As part of the food manufacturing 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 The Bury Black Pudding Company:

The Bury Black Pudding Company manufactures finest quality traditional black pudding. The company was founded in May 2002 and uses traditional cooking methods with a recipe that dates back over 100 years. We supply locally & nationally into supermarkets, wholesalers, pubs, restaurants, butchers, farm shops, our own market stall & web site customers in addition to our products being used as 'raw materials' in branded and own label frozen & chilled products. The Bury Black Pudding Company ensures that there is sufficient information relating to food safety throughout the food chain. This includes documented agreements, contracts, specifications, product information, food safety leaflets, allergen advice and reports.

Countries of operation and supply

The organisation currently operates in the following countries:

- UK and Mainland Europe.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- All new suppliers complete an SAQ relating to work practises and supply chain ensuring they follow the ETI Base Code.

High-risk activities

- No high risk activities have so far been recognised within the business relating to Modern Slavery.

Responsibility

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



- **Policies:** HR for recruitment, Technical department for supply chain.
- **Risk assessments:** Supply Chain information is documented onto a spreadsheet which the department are responsible for.
- **Investigations/due diligence:** Human Resource department responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** induction training and what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.

Relevant policies

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. Employees, customers or others who have concerns can [use our confidential helpline/complete our confidential disclosure form].
- **Organisational Values** The Company's values make 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.
- **Child Labour Policy** The Company intends to help all organisations that are involved in the manufacture or supply of goods to The Bury Black Pudding Company, collectively known as suppliers, understand the steps they need to take to protect young workers and to ensure compliance with the United Nations International Labour Organisation's Conventions relating to child labour.

The Company defines a young worker as someone under the age of 18 who is legally entitled to work and a child worker as someone under the age of 18 who is not legally entitled to work. We support the employment of young workers within our supply chain, provided that adequate precautions are put in place for their protection. Children must not be involved in the manufacture or supply of goods to The Bury Black Pudding Company.

Due diligence

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 and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through 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 auditing and requiring them to implement action plans
- using details of ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular

Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring all staff to undertake training on modern slavery during their induction to the company;
- a system developed for supply chain verification, expected to be in place by December 2020, whereby the organisation evaluates potential suppliers before they enter the supply chain; and are reviewing its existing supply chains whereby the organisation evaluates all existing suppliers.

Training

The organisation requires all staff within the organisation to complete training during their induction on modern slavery as part of Ethical Trading Awareness.

- 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 and Labour Abuse Authority and "Stronger together" initiative;

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- 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.



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Directorial approval

This statement was approved by the organisation's Managing Director and it is reviewed and updated annually.

Director's signature:

A handwritten signature in black ink that reads "D Pierce". The signature is written in a cursive, flowing style.

Director's name:

Debbie Pierce

Date:

2/6/20