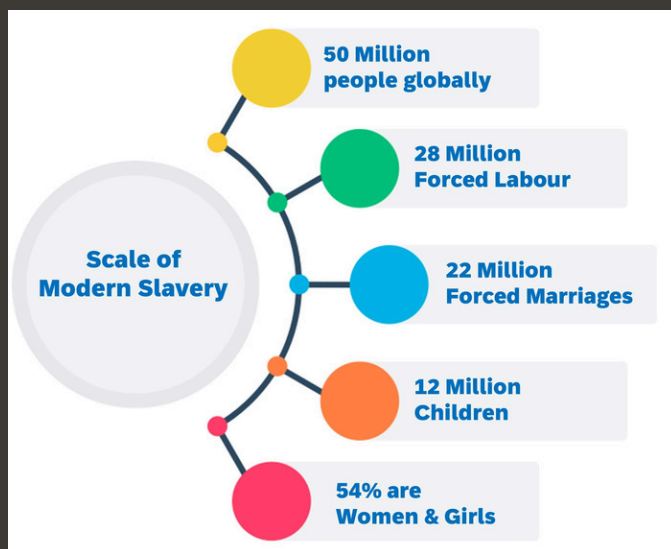


MODERN SLAVERY STATEMENT

A Global & Local Problem

Modern slavery is a serious and often concealed crime in which individuals are exploited for criminal purposes. The effects on victims can be devastating. Modern slavery includes slavery, servitude, forced and compulsory labor, and human trafficking.

The scale of the problem globally is worrying.



(Source: Walkfree.org)

Modern slavery is a serious and often concealed crime in the UK. In 2023, there were 17,004 referrals to the National Referral Mechanism (NRM), which is the UK's framework for identifying potential victims. This was similar to 2022.

The UK National Crime Agency (NCA) estimates the number to be closer to 100,000 people in the UK.

(Source: Gov.uk)

This is our ninth statement under The Modern Slavery Act 2015 and relates to our financial year, 1st September 2023 – 31st August 2024.



Our Business

Frank Roberts and Sons Limited is a fourth-generation family owned business with an annual turnover of £75m. We manufacture a variety of bakery, bread, morning goods and sweet treats products from our three premises in Northwich and Winsford, Cheshire and Ilkeston, Derbyshire, employing up to 660 people across the three locations.

Throughout this financial year the business has undergone significant operational changes as we moved manufacturing plants to maximise expansion opportunities.

Most of our suppliers are UK based, though we source some ingredients, packaging and equipment from around the world. We also employ some temporary and contract staff, both directly and through agencies, whilst outsourcing security, catering, cleaning and laundry services and some distribution to third party providers.

We are passionate about our values of courage, quality, community, nurturing and togetherness, seeking to bring them to life in every aspect of our business including relationships with our employees, customers and suppliers.





NOV, 2024

Our policy on Modern Slavery

Our Modern Slavery Policy is incorporated into a broader Ethical Trading Policy, which includes our stance on Human Rights. We also publish the ETI base code and Whistleblowing Policy to all employees.

We remain absolutely committed to ensuring that there is no form of modern slavery within our supply chain and business operations.

We strongly condemn any form of slavery, human trafficking or treatment which violates the human rights of any person. We do not knowingly support or engage with any business involved in these practices.

Our approach to due diligence

The cross functional Ethical Steering Group are responsible for such actions as mapping out and auditing our supply chain and products, assessing and managing risk, reporting on KPIs and making recommendations in terms of best practice and next steps. This Group meets quarterly and reports to the Board once a year.

We remain members of the Supplier Ethical Data Exchange, (Sedex), and actively encourage our suppliers to join Sedex within 12 months of working with us.

We continue to carry out a vendor assessment process on a regular basis for all our suppliers to ensure they comply with all our policies, using Source Dogg data management system to facilitate access to better information and risk identification.

Actions

Whilst no cases of Modern Slavery have been detected, we recognise risks in our supply chain.

Over the last 12 months, we have implemented the following:

- 99% of our raw material vendors fully approved on our data management system “Source Dogg” and have been working with all departments to complete the roll out to our overheads vendors. Part 1 of this action is complete, and we are now cross checking against our SAP live list to then ensure we catch all relevant vendors. The system automates and streamlines our front-end source to contract process. This requires vendors, amongst other things, to provide their Modern Slavery Policy or sign up to ours.
- Carried out an annual review of our Human Rights Impact Assessment to benchmark our practice and action year on year improvements.
- Continued to raise awareness across the business by issuing Modern Slavery updates throughout the year, using Stronger Together resources to enhance our induction process and recognising Anti-Slavery Day on 18th October.
- Participated in Customer Ethical Audits and prepared for our upcoming Sedex Ethical Trade Audit.
- Our Recruitment and HR team kept themselves informed of best practice through Responsible Recruitment Tools and Stronger Together initiatives.





NOV, 2024

Actions

- Continued to display information and posters, provided by Stronger Together, around the business to encourage employees to be vigilant and to highlight any concerns about any of their colleagues or any of our operations.
- Worked in partnership with a customer to carry out an anonymous engagement survey, which included modern slavery.
- Reviewed and promoted our Whistleblowing Policy, Ethical Trading Policy, Ethical Trading Statement, Modern Slavery Statement and ETI base code on our employee app; and
- Audited our Agency providers across a range of areas for compliance, including Modern Slavery and National Living Wage.
- Introduced anonymous Worker Questionnaires to our staff and agency colleagues to review their worker experiences.
- Upskilled the HR Team and The Ethics Steering Group in Response Planning.

Our Next Steps

Having achieved the KPIs we established on monitoring, policy development and education of staff our focus is:

- Develop a Modern Slavery Awareness module for all colleagues to access through our Learning Management System.
- To upgrade our ethical audits to Pillar 4 standard.
- To optimise the benefits of the “Source Dogg” database. As stated above, we have extended its reach to other areas of overhead spend beyond raw materials and packaging. The next step is to ensure our SAP vendor account live list match the database approved list and block any vendors that are not formally approved. Whilst we do not believe that we have any areas of high risk within our supply chain, the Source Dogg tool will give us greater transparency to be able to enhance our auditing and monitoring processes.
- We will also continue to improve our vendor assessment process, working with our labour providers to enhance our understanding of their operations and assure the promotion of robust ethical practices.
- To continue to work in partnership with customer and suppliers to share best practice and make incremental improvements.

This statement was approved by the Board on 5th December 2024.

Julia Banton

Julia Banton
Managing Director

