



pladis

pladis UK & Ireland Modern Slavery Statement

GODIVA



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Modern Slavery Statement

This statement is made in accordance with the Modern Slavery Act 2015, and outlines the steps pladis UK & Ireland has taken, as well as its future plans, towards the prevention of forced labour and human trafficking within its organisation and supply chain.

pladis UK & Ireland is a trading name of United Biscuits (UK) Ltd.

Business Organisation and Structure

pladis was formed in 2016 and is the proud steward of more than 300 years of family baking and confectionery experience. As one of the world's leading snacking companies it is home to beloved brands including McVitie's and Ulker. pladis is also proud to distribute a range of GODIVA chocolates exclusively for consumer-packaged goods channels around the world.

Within the pladis UK and Ireland business, there are over 4,000 employees across seven bakeries and one distribution site. We have circa 3,000 suppliers who are a core part of our business success.

Our Processes and Policies

We operate according to the pladis Code of Conduct which captures the most important responsibilities expected of our employees as they go about their work. We expect our suppliers to adhere to the Code and we do not work with suppliers who violate human rights.

In 2018, we also reviewed our supplier approval process. As part of this process we strengthened our supplier questionnaire through adding specific human rights questions, which we believe will allow us to proactively identify any areas where there could be a greater risk of modern-day slavery before pladis contracts business with the supplier.

As part of doing business with pladis UK and Ireland suppliers have to become members of the ethical due diligence platform, SEDEX along with having to complete the self-assessment questionnaire which allows us to identify higher risk suppliers.

pladis operates a whistleblowing policy which encourages colleagues (including agency workers and contractors) to report any circumstances of potentially unethical conduct within our organisation. This was reviewed and updated in 2018, at the same time we completed the roll out of our new pladis ethics hotline providing employees the facility of raising any concerns with an independent provider via telephone or confidential website. At the time of its launch we briefed all UK & Ireland employees on its purpose and how to use the service. The details of the ethics hotline for the line are also displayed on noticeboards across all our manufacturing and distribution locations, and are also communicated for awareness to all our new starters.

We continue to work closely and engage with our trade union partners by providing updates on progress being made, during our quarterly consultation and communication forums.

Our Suppliers



We see our suppliers as partners and we recognise the importance of working closely with them to ensure that they act responsibly.

Following on from our supply chain mapping exercise in 2017, we continue to work towards strengthening our processes and focus on our key raw materials.

In 2018, we continued our responsible wheat sourcing programme with our wheat suppliers. As part of this programme we have held multiple farmer meetings where we discussed the requirements of the UK modern slavery act and more specifically identification of Human rights on farms. As part of this programme we have continued to improve our traceability levels of our wheat and in 2018 we achieved 41% traceability back to farm, up from 30% in 2017 with an aspiration to increase this to 70% in 2019.

We also initiated our responsible palm oil programme, as part of this programme we have partnered with Earthworm Foundation (formerly The Forest Trust) to gain traceability back to mill for all the palm oil we use. We are now in the process of validating our No Deforestation, No Peat, No Exploitation (NDPE) ambition and identifying on the ground transformation programmes that will fight deforestation and provide support to workers out at origin.

Ongoing Due Diligence

As a member of the ethical due diligence platform, Sedex, all our UK sites undergo regular Sedex Member Ethical Trade Audits (SMETA) and customer audits, to ensure we are compliant with the required standards.

At the end of 2018 we implemented an improved audit process for our onsite agency labour providers. Building on our existing process which ensures we are able to measure compliance against the ETI base code as well as identify general good practices, we now focus specifically on the modern slavery policies, training/awareness programmes, monitoring controls and transparency of recruitment processes that our agency labour providers have in place. In 2018 we also agreed with our third-party hygiene services provider to adopt a similar audit regime across their operations on all our sites, and have commenced this in 2019.

As part of our supplier due diligence process and contractual terms we require our suppliers to become members of Sedex. Through this process we ensure that all suppliers complete the SEDEX self-assessment questionnaire.

As part of our supplier approval onboarding process we have also updated our supplier self-assessment, which is sent to all new suppliers, to include more detailed human rights questions and in doing so strengthening our new supplier requirements. All new suppliers complete the pladis self-assessment questionnaire before we start using them as an approved supplier.

Capacity Building through Human Rights training

When towards the end of 2017 we designed and first launched modern slavery awareness training, we set ourselves the ambition of ensuring that one third of all our employees and managers in our factories would complete this every year, on a rolling basis. At the end of 2018 more than 90% of managers and 50% of employees have achieved this.

In addition, against a similar rolling target, more than two thirds of our UK & Ireland employees have completed training designed to ensure an understanding of the pladis Code of Conduct.



We are pleased to be in a position where we are ahead of our training roll out plan. In addition, these training courses are now fully embedded as part of our new starter process.

Case Study: Investigating potential concerns within our UK based Supply Chain

During the latter stages of 2018, we became aware of some potential concerns of modern slavery within our UK supplier base. Whilst we were able to quickly establish that these were not the result of any evidence of activities associated with modern slavery, the review we undertook proved to be a valuable experience both for ourselves as the customer and for our supplier.

As a result of our review, the supplier is now working with us to implement a number of improvements to the way in which the risks associated with modern slavery within their own operation are managed. These improvements will include implementation of effective management and employee awareness training, multiple translations of a suite of employment documents and policies, and a strict policy regarding shared bank accounts.

This has served as a valuable experience which will benefit the further development of awareness and understanding within our own organisation. In particular, through improvement and re-launch of our line manager training, we will use this experience to highlight that the risks of modern slavery and need for the right controls are not only a reality in other countries, but also exist in the UK.

Future Plans

In 2019, with the support of Impactt Ltd we will look to deliver specific training on human rights for functions such as Procurement and Safety, Quality, Security and Environment teams, who have direct relationships with our suppliers.

We will focus on ensuring all our suppliers on SEDEX have completed the self-assessment questionnaire. In 2018, out of our 600 suppliers we had one improvement plan pending, in 2019, we will also look to expand SEDEX programme to include other material groups such as warehouses and services.

We will work towards increasing our Back to Farm agreements to achieve our aspiration of 70% of our total UK wheat supply.

We will improve and refresh our management modern slavery training and ensure completion of this by all managers before the end of 2019. This will incorporate the learnings we have been able to benefit from through our experiences gained in 2018, as described in the above case study.

We will continue with our rolling plan to provide modern slavery awareness training to all manufacturing employees, with a view 70% of our total population having been trained by the end of 2019.

At our manufacturing and distribution sites, we will continue with the roll out of our ethical audit process to our agency labour providers and hygiene services providers. Through this we hope to see their adoption of improvements in the way they manage and support their employees, and ensure the risks of modern slavery in their own operations and onward supply chains are effectively managed. We will also evaluate our other on site third parties in order to take a risk-based view of extending this audit process further.



Following our initial launch and communication of the global ethics hotline in the last quarter of 2018, we will ensure our employees are re-briefed regarding the process, its purpose, confidential nature and how it should be used to raise a genuine ethical concern.

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 and constitutes the pladis statement for the financial year commencing January 2018 and ending December 2018.

The Boards of pladis UK and Ireland have reviewed and approved the statement and it has been signed on their behalf.

Nick Bunker

Managing Director, pladis UK & Ireland