

Financial year ending  
31<sup>st</sup> December 2023

# Samworth Brothers

RESPONSIBLE BUSINESS

## Modern Slavery Statement



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## INTRODUCTION

Samworth Brothers recognises the risk of, and need to combat, modern slavery in all its forms. Our operations impact workers both within our UK business and throughout our supply chains.

We strongly believe in championing human rights, and we're committed to making sure that everyone who works for, with, or adjacent to our business is treated fairly. Our Responsible Sourcing Policy, Human Rights Policy and this statement outline our commitment and approach to human rights due diligence. Our commitments reference the United Nations (UN) Guiding Principles on Business and Human Rights and the Ethical Trading Initiative (ETI) base code.

The UK Modern Slavery Act 2015 requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. This statement outlines the progress Samworth Brothers (Holdings) Limited has made during the financial year ending 31st December 2023, and sets out the steps taken by our business to prevent modern slavery and human trafficking in our own operations and our supply chains.

This statement is produced for Samworth Brothers (Holdings) Limited and covers the following legal business entities:

- Gibbs Croft Limited – trading as Soreen
- Manton Wood Limited
- Samworth Brothers Limited
- West Cornwall Pasty Co. Limited
- Higgidy Ltd

This statement was approved by the Board.



Hugo Mahoney

Chief Executive Officer

4<sup>th</sup> June 2024

## OUR BUSINESS AND SUPPLY CHAINS

Samworth Brothers is a privately owned, fourth-generation family business, dating back to 1896. We produce high quality chilled and ambient foods enjoyed by millions of people across the UK every day. The business operates in food to go, savoury pastry, prepared meals, sausages and cooked meats. The group owns several popular brands including Higgidy, Soreen, Ginsters, Urban Eat, and the West Cornwall Pasty Co. Other brands include the pie specialists Walker & Son and Dickinson & Morris.

Our customers are mostly large UK retailers, with some of our products being manufactured for food to go locations. Additionally, the group owns several businesses that focus on service provision, these include Samworth Brothers Supply Chain (SBSC) and Fresh Food for Now Company that provide logistics services, and Westward Laboratories, a food safety testing laboratory.

More than 12,500 people work in the business, and we operate from some of the most well-invested and modern food manufacturing sites in the UK.

Our culture at Samworth Brothers is special; our purpose 'We do good things with great food' is at the core of everything we do, underpinned by three company values: We are a family, We take pride, We make things happen.

Our 'we are a family' value means we welcome, appreciate, and encourage each other, no matter who we are or where we're from – we're proud to employ colleagues of 98 different nationalities. We're powered by trust and respect, so everyone can be open and honest with one another.

We celebrate our colleagues individually and collectively, through The Samworth Way workshops where managers and colleagues are encouraged to share stories about the way they've seen our values come to life.

Our supply chain is global, and we continually aim to strengthen our approach to anti-slavery due diligence. The products we purchase fall into three major categories: ingredients, packaging, and indirect goods and services. We currently source several thousand ingredients, such as meat, produce, dairy, bakery items, palm oil and herbs and spices, with a large number of items being sourced from the UK.

# OUR POLICIES AND GOVERNANCE

## Policies

At the heart of our approach to human rights are several important internationally recognised declarations, standards and codes, including:

- The UN Universal Declaration of Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights
- The Ethical Trading Initiative (ETI) base code

Our approach to addressing modern slavery sits within our approach to human rights and is supported by our Human Rights Policy and Responsible Sourcing Policy, which set out our obligations to customers, colleagues and communities in our own operations and our supply chain and outline our commitment and approach to human rights due diligence.

Our Human Rights Policy is built on the Ethical Trading Initiative (ETI) base code and sets out requirements for our manufacturing sites, including SMETA (SEDEX Members Ethical Trade Audit).

Our Responsible Sourcing Policy sets our key expectations for supply partners, including human rights. It outlines our minimum requirements, but also explains our approach to work more collaboratively so that collectively we can make a larger positive impact. Our Policy defines our expectations for our direct (tier one) suppliers of ingredients, packaging and selected indirect categories. Samworth Brothers are committed to working in line with the UN Guiding Principles on Business and Human Rights. We ask that our suppliers follow the standards that are contained in the ETI base code, register with SEDEX (Supplier Ethical Data Exchange) and have policies and processes in place to proactively manage human rights risks throughout their supply chains.

Where any non-compliances are identified, Samworth Brothers approaches remediation in an open and transparent manner and aims to collaborate with its supply partners to resolve issues rather than terminating business relationships. This ensures issues are addressed and any workers impacted obtain access to remedy. However, if we believe a supply partner is not providing appropriate support to remedy issues, we will have no option other than to terminate our business relationship with them.

Our Group Responsible Business Team and People Team are also responsible for several other policies that help our business to combat modern slavery, both within our business and supply chain. These policies are approved by the relevant Group Executive Director.

- Bribery & Corruption
- Bullying and Harassment
- Equality and Diversity
- Modern Slavery and Forced Labour
- Right to Work
- Whistleblowing

## Governance

Our Group Holdings Board is involved in our Responsible Business approach and receives regular updates about our progress. The Group Holdings Board has delegated responsibility to the Group Executive Board to manage the business' impact on all Responsible Business topics. The Group Executive Board receives a Responsible Business Programme update at every monthly meeting.

Our Responsible Business Programme is reviewed by our Responsible Business Steering Committee. The Responsible Business Steering Committee meets three times a year to review programme performance and ensure the agenda has the support needed to progress at the pace required.

## **ASSESSING AND MANAGING RISK**

### **Risk Assessment**

Our supply chain is complex and international and we are aware of the risk of modern slavery. As part of our due diligence, we complete a risk assessment of our ingredient supply chain to identify supply chains with the greatest risks so we can focus our efforts.

We use the Food Network for Ethical Trade Human Rights Risk Assessment Tool which includes various data sources including the U.S. Department of Labour, the Walk Free Foundation, and the International Trade Union Confederation. We are then able to establish which ingredients have the greatest human rights risks, based on country of origin and ingredient specific metrics provided.

Our risk assessment identified the following areas of higher risk products: poultry, produce, seafood, palm oil and herbs and spices. We continue to work with our supply partners to map and understand these supply chains further.

We also use data from SEDEX and individual suppliers to ensure the most accurate picture of the risk profile is presented.

The outputs from our risk assessment are utilised to complete the Responsible Business function risk register, directly feeding into the Group's risk management process. Our broader risk process helps us to identify human rights related risks and is refreshed on an annual basis.

"Responsible Sourcing" is highlighted as a principal risk within our Group risk management process. Exploitation of workers and human rights breaches are the key drivers of this risk. We update on current and future risks, progress and performance, to the Group Risk Management Committee on at least an annual basis.

### **Managing and Mitigating Risk - our business operations**

Within our manufacturing businesses, we're a member of SEDEX and are audited to the SEDEX Members Ethical Trade Audit (SMETA) standard. All of our manufacturing facilities are registered on SEDEX and have undergone periodic semi-announced SMETA audits. We address and resolve any non-conformances. Our Human Rights Policy requires all our operations to be subject to third-party ethical audits every two years.

The majority of our workforce are employed on permanent contracts. However, to respond to the peaks and seasonal variance in food manufacturing we partner with several GLAA registered labour providers. We have long standing relationships with our key recruitment providers, and they have robust onboarding and induction processes that highlight how to identify modern slavery to all workers. Additionally, we conduct regular audits of our recruitment providers as part of our due diligence in this area. In 2023 we reviewed and strengthened our auditing schedule.

We encourage our people, customers, and other business partners to report any concerns related to ethical issues, within our business. This includes highlighting any red flags that could be indicators of modern slavery. Our Whistleblowing Policy is prominently displayed at all sites in areas people frequent. This provides details of our confidential, independent hotline which individuals can use to highlight any concerns they may have.

A project team was established to review our approach to tackling modern slavery within our business and this continued to meet in 2023. We worked with Slave-Free Alliance to develop our incident response process, to ensure robust management if ever a concern is raised. Colleagues from different functions at a site were involved in creating this process in two workshops run by Slave-Free Alliance. Further input was provided by other site People Leads and colleagues that work in group

functions. This has helped to ensure we have created a robust process that is appropriate for our own operations and we continued to develop this process in 2023.

Our company induction includes how to spot the signs of modern slavery and how to report it. Stronger Together forms part of this induction for all permanent and agency colleagues. Additionally, all colleagues receive a copy of our electronic handbook - this includes the Stronger Together Video and highlights the risks, and provides practical support.

In 2023 we focussed on training incident response teams at sites. We worked with an expert trainer who helped us design and deliver training. Content included an overview of what modern slavery is and its prevalence in the UK. Information was provided on how to spot the signs of modern slavery including case studies. Specific training was given on the Samworth Brothers incident response procedure, including an incident response exercise. In 2023 74 colleagues attended this training, with further sessions planned for 2024.

We have promoted Stronger Together since 2013. Stronger Together is a multi-stakeholder initiative aimed at tackling modern slavery in supply chains. We also utilised resources from Stronger Together to help us conduct a gap analysis of our progress.

## **Managing and Mitigating Risk - our supply chains**

Samworth Brothers are committed to working in line with the United Nations (UN) Guiding Principles on Business and Human Rights.

In 2023 we continued to strengthen our supplier policy in this area and shared our Responsible Sourcing Policy and engaged key supplier partners to seek feedback, prior to re-launch in 2024. We have continued to strengthen and develop our process, which is built on four core principles:

- **Identity** - mapping key high risk supply chains to broadly assess raw materials and geographical risks of modern slavery and human trafficking.
- **Prioritise** - addressing the highest risk raw materials within our supply chain.
- **Act** - collaborating with our suppliers and other stakeholders to encourage the eradication of forced labour and promote worker representation.
- **Monitor and Review** - strive for continual improvement in our process through monitoring KPIs and reviewing the outcomes achieved from the action taken.

We utilise a leading supplier management platform, which has advanced our supplier approval procedure, risk assessment and delivered enhanced supply chain traceability.

Another key tool that we use to aid risk identification is the Supplier Ethical Data Exchange (SEDEX). We are SEDEX members and have invested in 'buyer' membership, which enables us to view suppliers' ethical trade data. We ask the following suppliers to link to us and share their data on SEDEX:

- All direct suppliers: Food manufacturing sites, Packaging suppliers, and Agents (food and packaging)
- All food manufacturing and packaging sites supplied via agents that are required to complete our technical self-assessment questionnaire.
- Indirect suppliers – will be risk assessed and asked to join SEDEX on a case-by-case basis

Suppliers are requested to complete the SEDEX Self-Assessment Questionnaire. We also monitor ethical audits on SEDEX. Our supplier management platform has been built to include data fields relating to SEDEX and country of origin human rights risk metrics. We have been monitoring percentage of direct suppliers with SEDEX links.

We work proactively with suppliers to ensure that appropriate actions are taken when we identify risks to ethical trade standards. For several years we have had resource at group level to help us manage and monitor these risks and provide guidance when needed.

### **Collaborative Working**

Modern slavery and human rights violations are global issues that we cannot tackle in isolation. Therefore, we work closely with our suppliers, customers, and peers to identify issues.



Since 2019 we have partnered with Slave-Free Alliance - a social enterprise and membership initiative launched by anti-slavery charity and victim advocacy organisation Hope for Justice.

We were founding members of the Food Network for Ethical Trade (FNET). FNET is an initiative made up of UK-based suppliers and retailers whose mission is to improve human rights in global food supply chains through a common approach to managing ethical trade. We actively participate in an FNET working group; collaborative forums that allow members to develop common approaches to ethical trade.

Samworth Brothers are also founding supporters of the Modern Slavery Intelligence Network (MSIN), a pioneering non-profit collaboration in the UK food and agriculture sector. Please visit [www.msin.org.uk](http://www.msin.org.uk) for further details.



## TRACKING OUR PROGRESS

Measure	Target	Status (2023)	Progress
Independent Ethical Audit: all Samworth Brothers manufacturing sites to have an ethical audit every 2 years	100%	90% - corrective action in place for audit in 2024	
Supplier SEDEX Registration: Direct food, agents and packaging suppliers registered	100%	92%	
Number of colleagues trained on modern slavery incident response procedure	N/A	74	