

This statement sets out Lantmännen Unibake UK's actions to understand all potential modern slavery risks related to its business and to put in place steps are aimed at ensuring there is no slavery or human trafficking in its own business and/or 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**

Lantmännen Unibake UK is the UK's leading supplier of high quality bakery products to retailers, wholesalers and the foodservice industry. The organisation has three sites in the UK including two bakeries in Milton Keynes and Bedford, producing bread and Danish pastries respectively. Lantmännen Unibake UK is part of the Lantmännen Group, which is owned by 27,000 Swedish farmers and is one of Northern Europe's largest groups within the agriculture, machinery, energy and food sector.

### *Countries of operation and supply*

The organisation currently operates in the following countries:

- UK – Including two manufacturing sites and one commercial office
- South Africa – Home-based employees
- Australia – One sales office (belonging to a distributor)
- Singapore – Home-based employee

### **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 (If you would like a copy of any of the policies below then please contact [unibakeuk.hr@lantmannen.com](mailto:unibakeuk.hr@lantmannen.com)).

- **Whistleblowing policy** The organisation encourages all its employees, 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 reporting function on the company website.
- **Ethical Trading Policy** The organisation recognises that our commercial and corporate activities have myriad impact on our stakeholders. Therefore, as a socially responsible company, our stakeholders have a right to expect that products manufactured by the UK

business are produced in working conditions that are hygienic and safe, all employees are treated with full consideration to their basic human rights and the company acts in an ethical manner and beyond basic legal requirements. Additionally, the company is committed to following and implementing the principles of the Ethical Trading Initiative Base Code.

- **Employee code of conduct** The organisation's code of conduct makes 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 and managing its supply chain.
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. All suppliers, whether raw materials, engineering parts or services are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. Group Procurement measure the compliance to the Code of Conduct and require that 95% of our suppliers are approved and this is reviewed every 2 years.

### 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:

- Evaluating the modern slavery and human trafficking risks of each new supplier (as part of a general labour rights assessment)
- Conducting supplier audits or assessments either through the organisation's own employees or a third party auditor, which have a degree of focus on slavery and human trafficking where general risks are identified;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

### Performance indicators

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

- Ensuring that key members of HR team have undertaken training on Modern Slavery (Training has been completed on 27<sup>th</sup> January 2016)
- Conducting a bi-annual review of the Supplier Code of Conduct every two years with all of our suppliers
- Communicating a Team Brief which explains Modern Slavery to all employees by the end of June 2017

### Training

The organisation requires all new employees to attend training on Modern Slavery as a module within the organisations wider HR Induction when they join the business.

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The organisation requires all current employees to understand the Team Brief, which will be communicated at the end of June 2017. The aim of this Team Brief is to ensure that all employees understand what Modern Slavery is, how to identify Modern Slavery and to understand what the organisation is doing to ensure there is no Modern Slavery within our business or supply chains.

The organisation's modern slavery training covers:

- 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 distributing leaflets to staff and putting up posters across the organisation's premises.

The leaflets and 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
- What external help is available, for example through the Modern Slavery Helpline.

#### **Board approval**

This statement has been approved by the organisation's board of directors who will review and update it annually.

**Director's signature:**



**Director's name:**

CHARLOTTE JAMES

**Date:**

22nd June 2017.

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