



BRITANNIA SUPERFINE LTD
MODERN DAY SLAVERY STATEMENT

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Introduction

Britannia Superfine is aware of modern slavery risks and acknowledges responsibility to the Modern Slavery Act 2015. We are committed to establishing action plans to reduce incidence of slavery and human trafficking within our supply chain and ensuring there are no incidence directly within our business.

We also endeavour to achieve transparency within Britannia Superfine and with our suppliers and focus on continuous improvement. Moreover, Britannia Superfine commits to respecting human rights and will avoid infringing on the human rights of others and will address any issues where identified.

Definitions

Modern Slavery – the recruitment, movement, harbouring, or receiving of human beings through the use of force, coercion, abuse of vulnerability, deception, or other means for the purposes of exploitation.

Human Trafficking – the arranging or facilitating of travel of another person with a view to that person being exploited.

Our Business

Founded in 1939, Britannia Superfine has been forged from six generations of passion and hard work of the Manser family. Britannia Superfine is today one of the Europe's leading manufacturers of chocolate products, fondants, sugar and chocolate-based ingredients, employing over 160 staff. This statement applies to all aspects of our business.

We have an appointed Director, Stephen Manser, who has responsibility for the human rights, ethical trade and corporate social responsibilities of the business including an explicit responsibility for preventing modern slavery.

Following a review in 2017 it was identified the only area of concern for our own business where there was a potential for the company to be exposed to a risk with regards to modern slavery was the use of agency staff. It was therefore decided that Britannia Superfine would only directly employ staff and the use of agency staff is no longer permitted.

Two of our Directors have undertaken training on modern day slavery and shared the knowledge obtained within the company.

Recruitment

All managers with a responsibility for recruitment within our business are aware of Britannia Superfine's recruitment procedure.

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All managers with a responsibility for recruitment within our business will also be aware of Britannia Superfine's anti bribery policy.

All managers with a responsibility for recruitment within our business will have been trained by HR on the signs to look out for at interview.

Questions as part of the recruitment will include:

- How the worker found out about the work.
- Whether the worker has paid anyone, or will have to pay anyone to obtain the work in question.
- Whether the worker has paid anyone to get to the UK if a newly arrived migrant.

Managers and Supervisors

There is a formal written process for managers, supervisors and workers to report and record suspected cases of labour trafficking, forced labour and other hidden labour exploitation. Managers and supervisors are made aware of the signs to look out for and encouraged to raise concerns.

All staff will be aware of Britannia Superfine's whistleblowing policy. Managers and supervisors are trained and instructed to whistleblow where they have a concern over another manager or supervisor.

Induction

Included within an employee's induction will be a section on how to recognise and report forced labour, labour trafficking and other hidden third party labour exploitation.

Payroll and HR

We conduct audits on a defined frequency to identify, deterring and tackle hidden labour exploitation wherever possible. Checks will be undertaken on:

- Addresses of our workers and workseekers for high occupancy of particular houses.
- Bank accounts to identify unrelated workers paid into one account.
- Mobile phone numbers to identify seemingly unrelated workers who are contactable through one or sequential numbers.
- Documents for the same next of kin and/or same place of origin/location in home country.
- Emergency contact numbers to identify seemingly unrelated workers who are contactable through the same number.

This statement will be reviewed annually by the Senior Management team.