

## Modern Slavery and Human Trafficking Policy

This policy relates to the Modern Slavery Act 2015 and is an extension of the Puratos Group Business Ethics and Code of Conduct.

### What is Slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

<b>Slavery</b>	Exercising powers of ownership over a person
<b>Servitude</b>	The obligation to provide services is imposed by the use of coercion
<b>Forced or compulsory labour</b>	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
<b>Human trafficking</b>	Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers each of these activities.

### Policy statement from senior management

Puratos UK Limited is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers.

Modern slavery and human trafficking are violations of fundamental human rights. They may take various forms, including slavery, bonded and forced labour, sex trafficking, child labour and domestic servitude. These criminal activities all deprive people of liberty in order to exploit them for personal or commercial gain.

1. Puratos has been present in the UK since 1972 with a manufacturing facility in Buckingham as Puratos Ltd since 1989 and Liverpool since 2018. We currently employ approximately 110 people and supply over 500 products to industrial customers, in-store bakeries, craft bakeries, confectioners, chocolatiers, caterers, ice cream manufacturers and food service groups. The company is able to tailor make products to suit individual customer needs and has a separate state of the art Innovation centre with a full working bakery to replicate all aspects of the baking industry.
2. We are committed to ethical principles, and require all employees to comply with the employment legislation and supply chain management legislation in the countries within which we operate.
3. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This policy applies to all persons who act on our behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers, volunteers, interns, business partners and our supply chain.

### Supply Chain Management

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, and as a result:

1. We will not support or deal with any business which is known to be involved in slavery or human trafficking.
2. As part of our due diligence procedure, prior to approving a new supplier, we will review the controls which they undertake to eliminate modern slavery and human trafficking, particularly in regard to goods imported from outside the UK and EU which are potentially more at risk of involving slavery and human trafficking.

We make sure our suppliers are aware of our policies and adhere to the same high standards.

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### Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures prior to approving a new supplier and auditing them at least annually, including that we will review the controls which they undertake to eliminate modern slavery and human trafficking, particularly in regard to goods imported from outside the UK and EU which are potentially more at risk of involving slavery and human trafficking.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers (in line with section 4.12 of our Business Ethics and Code of Conduct).

### Risk and compliance

Puratos regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain.

We do not consider that we operate in high risk sectors or locations because we do not deal with customers and suppliers from outside the EU.

We will not support or deal with any business which is known to be involved in slavery or human trafficking

We ensure all our suppliers adhere to our anti-slavery policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our *policies* we will immediately seek to terminate our relationship with the relevant supplier.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

### Communication and Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Employees are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Our annual Ethical Trading Statement details the key commitments to Slavery and Human Trafficking and will provide information to supplement this policy, setting out the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains, and in any part of our own business. Our annual statement will include details of our activities, supply chains and actions being taken to ensure that Modern Slavery is not deliberately or inadvertently supported by us.

This policy has been written in accordance with section 54(1) of the Modern Slavery Act 2015.

Signature:



Julia Darvill  
**Managing Director**  
Puratos UK Ltd



David Elmer  
**Operations Director**  
Puratos UK Ltd

Date: 1<sup>st</sup> January 2022