

## **Modern Slavery and human trafficking statement**

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking within all of our business activities. Pursuant to s54 of the Modern Slavery Act 2015, Finnebrogue offers the following statement regarding its efforts to prevent slavery and human trafficking both within our business, and within its supply chain, for the financial year ended 31st August 2016.

### **Our Business**

Finnebrogue is a food company with over 300 employees, specializing in the production of quality sausage, burger and stuffing products. We've built our business on crafting artisan food that makes a difference, from the welfare of the animals; stewardship of the land to the way we treat our colleagues. Our dedication to excellence, craftsmanship and passion for great food is the driving force behind everything we do; and our integrated business model adopts the principles of quality, integrity and customer satisfaction.

### **Our Policies on Slavery and Human Trafficking**

Finnebrogue respects and acknowledges internationally recognised human rights principles. Within our company and throughout our supply chain, we are committed to treating people with dignity and respect. Finnebrogue internal policies include our Human Rights policy and our Ethical Trade Policy which reflects our commitment to acting ethically and with integrity in all of our business relationships. We confirm that we will not tolerate any abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected or protected.

### **Our Supply Chain**

We work within a large, diverse value chain of business partners and stakeholders. There are often two to five levels of suppliers between us as an end user and the source of raw materials that enter the manufacturing process. We recognise that each entity in this chain has its own independent duty to respect human rights. We expect our business partners and stakeholders to adhere to ethical business conduct consistent with our own, and are committed to working with them to fulfill this common goal

### **What have we done?**

- We have embraced the Stronger Together Programme within our business, and support the work being done to reduce forced labour and human trafficking in the UK. Our HR Team have been externally trained in the exploitation of human labour. All employees have received training in their rights at work. We provide mechanisms to our employees to raise issues and concerns, via the Employee Voice, our open door policy, and our confidential Whistleblowing hotline.

- After acknowledging the risk that agency labour creates in relation to human trafficking, we have removed agency labour from our business at an operational level.
- As part of our initiative to identify and mitigate risk we monitor ethical standards across the business on a regular basis both internally and via external third party audits. We undergo unannounced SEDEX members Ethical Trade Audits, customer ethical trade audits, and these are supported by our own internal Ethical verification audits.
- The business is an AB member of SEDEX and our suppliers register with SEDEX and make their Ethical data visible to us, enabling us to drive Ethical standards within our supply chain. At August 2016, we currently have over 60 suppliers linked to us on SEDEX. Where suppliers are not currently linked to Finnebrogue on SEDEX or registered on SEDEX, then they are required to complete our Ethical Questionnaire (based on the ETI Base Code) until they are registered.
- We have operated a risk-based approach in the steps we have taken that seek to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business. Through the use of a broad enterprise-wide slavery and human trafficking risk assessment we seek to focus our relevant policies, standards, practices and programmes on those parts of our supply chain and our business - and upon those geographies - where we believe greatest risk of slavery and human trafficking lies. Our initial focus has been on primary supply.

#### What will we do next?

Finnebrogue will maintain the current controls in place over the next twelve month period. Additional activities will include:

- An increased focus within the supply chain beyond a primary level, with completion of risk assessments (and associated corrective actions) at a secondary and tertiary level.
- The implementation of a Human Rights Strategy within our Business

This Statement was approved by the Managing Director of Finnebrogue on 31 August 2016.

Brian McMonagle

Managing Director  
31 August 2016

