



## **MODERN SLAVERY COMPLIANCE STATEMENT**

### **INTRODUCTION**

Slavery, forced labour, debt bonded labour, servitude and human trafficking (which are all forms of “modern slavery”) are crimes with tragic and traumatic consequences for those who suffer such exploitation. It is the responsibility of everyone to be alert to and vigilant in identifying both the risks and the signs of modern slavery. Baxters remains committed to continually improving our awareness and practices, working in partnership alongside our suppliers to combat slavery like practices within our supply chains. Where occurrences are identified Baxters will report the matter to the GLAA (Gang Master and Labour Abuse Authority) or Police in the UK and with the appropriate authorities within our supply chains internationally.

### **ORGANISATION'S STRUCTURE**

Baxters Food Group (Baxters) is a manufacturer of fine quality food products including soups, preserves, condiments and chutneys. The Group has over 1,400 employees worldwide and operations in the UK, USA, Australia and Poland. Baxters ultimate parent company is W.A. Baxter & Sons (Holdings) Limited (Parent).

The Group has a global annual turnover of circa £300m.

### **OUR BUSINESS**

Baxters is headquartered in Edinburgh, Scotland and has four operating sites in Europe at Fochabers in Scotland, Colchester and Burntwood in England, and Wolsztyn in Poland, as well as businesses in the USA and Australia.

### **OUR SUPPLY CHAINS**

Baxters works with a large number of suppliers internationally supplying products and services in the following categories;

- raw materials and part processed products for the production of food;
- packaging;
- transportation of goods; and
- contracted services.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Baxters is committed to ensuring that there is no modern slavery or human trafficking, discrimination or harassment in our supply chains or in any part of our business. Our Ethical Trade Policy and Modern Slavery Policy reflect our commitment to acting ethically and with integrity in all our business relationships.

## DUE DILIGENCE PROCESSES FOR MODERN SLAVERY

- The Group HR Director at Baxters is the ethical trade sponsor for the business. An Ethical Steering Group comprising senior executives has been established to oversee the work of an Ethical Working Group. The Ethical Working Group is a cross departmental team working to implement new systems and increase awareness of ethical trading and modern slavery within the business and its supply chain.
  - Baxters is a member of SEDEX and has actively encouraged all ingredient suppliers to join the data exchange and link to Baxters. All Baxters European sites of production have undertaken Sedex Members Ethical Trade Audits (SMETA) ensuring that any non-conformances have been acted upon. A number of 2nd party and 3rd party audits have been undertaken at supplier level.
  - Awareness raising and training sessions have taken place across the European business informing factory workers about Modern Slavery and what flags to look out for alert them to possible victims of abuse. Over 350 workers received this training, a further 25 middle managers, including those mostly likely to come across a case of Modern Slavery, received training in dealing with such a situation as well as understanding the correct reporting mechanisms. Members of the board and senior management team underwent advanced awareness raising on Modern Slavery which included awareness on the UN Guiding Principles on Business and Human Rights as well as The UN Sustainability Development Goals.
  - Various channels of communication have been used across our European sites to make staff aware of Modern Slavery and events related to it as part of an ongoing awareness programme.
  - Baxters has started the process of mapping its ingredient supply chains for the European business.
  - A number of 2nd party and 3rd party audits have been undertaken at supplier level. A risk assessment matrix has been developed, looking at a number of information sources to enable the process of risk assessing ingredient suppliers to begin.
  - Policies for Ethical Trade and Modern Slavery have been approved and shared with the business and suppliers.
  - Baxters continue to use Stronger2gether videos in induction training and display Stronger2gether posters across UK sites.
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## **SUPPLIER ADHERENCE TO OUR VALUES**

We adopt zero tolerance to all forms of modern slavery and we expect all those in our supply chain and contractors to adhere to those values as outlined in our Ethical Trade Policy and Modern Slavery Policy.

This statement is made pursuant to section 54 of The Modern Slavery Act 2015 and reflects the trading period March 2017 – March 2018.

A handwritten signature in black ink, appearing to read 'McGill', with a small mark above the 'i'.

**MICHAEL MCGILL - DIRECTOR  
BAXTERS FOOD GROUP LIMITED**

