

## Introduction

This statement sets out 's actions of Panificio Italiano (trading as Heathrow Bakery and Adams Bakery Ltd) to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2016 to 31 March 2017.

As part of Food Manufacturing and Consumer Goods (FMCG), 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

This statement covers the activities of Panificio Italiano (trading as Heathrow Bakery and Adams Bakery Ltd), Iver Ridgeway Estate, Iver, Bucks. SL0 9HX. England.

- The organisation, is a manufacturer of bread products to retail and Airline supply chain.

### *Countries of operation and supply*

The organisation currently operates in the following countries: United Kingdom

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

All personnel are strictly screened by either our Human Resources department or agencies to which they have carefully screened and vetted to carry out employment checks on our behalf, to ensure they have true identities and the right to work in the UK.

### **High-risk activities**

The following activities are considered to be at high risk of slavery or human trafficking:

We distribute bread products in large lorry vehicles, so therefore, we train our drivers to check all vehicles for human traffic, although our vehicles do not cross borders, we expect our drivers to check for human traffic

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### **Responsibility**

Responsibility for the organisation's anti-slavery initiatives is as follows;

- **Policies:** HR are responsible for policies which are then signed off by senior management.
- **Risk assessments:** Senior management (general manager) broad organisational responsibility for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** The Human Resources team are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** HR Personnel will manage the training and updates and Management will be briefed on standard practices relating, to better understand and respond to the identified slavery and human trafficking risks.

### **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 [select the relevant policies from the list below and include links to the full text]:

- **Whistleblowing policy** The organisation encourages all its workers, 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 highlight any areas of concern to the HR department in strictest confidence
- **Employee code of conduct** the organisation's code 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 abroad 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. Suppliers 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.
- **Recruitment/Agency workers' policy** the organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

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### 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 [select the relevant actions from the list below]:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments through [the organisation's own staff/third party auditor], which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier.
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular, working with our customers through audits to meet all customers high standards, as well as our own mission statements to provide quality products at competitive prices.
- using our auditors to check our suppliers and customers are adhering labour standards, compliance in general, and modern slavery and human trafficking; and
- 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;

- requires HR professionals and managers' within the business to have completed training on modern slavery by April 2018.
- developing a system for supply chain verification in place since April 2018 expected to where by the organisation evaluates potential suppliers before they enter the supply chain;
- reviewing its existing supply chains expected to be completed by April 2018, whereby the organisation evaluates all existing suppliers.

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**Training:**

The organisation requires managers within the business and HR professionals within the organisation to complete training on modern slavery and the organisation's wider human rights/ethics/ethical trade training programme.

The organisation requires HR professionals to be aware through professional membership updates, (CIPD and Xpert HR and such like organisations), to cascade the updated information on modern slavery through to staff and managers via focus groups.

The organisation's modern slavery training to office staff covers our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- 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 messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

**Awareness-raising programme**

As well as training staff, the organisation has raised awareness of modern slavery issues by training managers and staff to be aware and what signs to look for and how to report any incidents.

- 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; and
- what external help is available, for example through the Modern Slavery Helpline.

**Board approval**

This statement has been approved by the organisation's senior management team who will review and update it annually.

**Head of Technical: Paramvir Deol**

**Signature:**  **Date: 09/11/17**

**Author: Ashleigh Duncan – HR Manager**

**Signature:**  **Date: 09/11/17**

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