



## MODERN SLAVERY STATEMENT

### **Fox's Burton's Companies (FBC) UK Limited ("FBC UK") Slavery and Human Trafficking Statement for the Financial Year 2023 - 2024 ending on 26 August 2024**

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

#### **About Modern Slavery**

Modern Slavery is a criminal act and a violation of human rights. At FBC we take a zero-tolerance approach to Modern slavery, condemning it in all forms including forced labour, forced marriage, debt bondage, forced commercial sexual exploitation, human trafficking, slavery like practices, sale and exploitation of children and the removal of freedoms. As a business with a global supply chain, we recognise that we have a responsibility to take a robust approach to preventing slavery and human trafficking. FBC is committed to ensuring all our business and partners are free from slavery and human trafficking.

We recognise that having the right governance framework to address human rights and ethical behaviours is fundamental to managing the risk of modern slavery in our business and supply chains. Responsibility for overseeing FBC's approach to preventing modern slavery is held by our Chief Procurement Officer and the Chief People & Organization Officer. According to the UN Agency - International Labour Organization, the latest global estimates indicate that 50 million people were living in modern slavery in 2021. Of these people, 28 million were in forced labour and 22 million were trapped in forced marriage. Unfortunately, the number of people in modern slavery has risen significantly in the last five years. In 2021, 10 million more people were in modern slavery compared to 2016 global estimates.

#### **Organisation and Supply Chain**

FBC UK brings together two amazing biscuit legends: Fox's and Burton's, together with a combined heritage dating back as far as 1853. FBC UK encompasses a variety of beloved biscuit brands, including Fox's Biscuits, Burton's Biscuits, Maryland Cookies, Jammie Dodgers, Wagon Wheels, Paterson's, Thomas Fudge's, Lyons Biscuits, and Brontë.

We employ just under 3800 people around the UK, in our manufacturing facilities in Llantarnam, Edinburgh, Blackpool, Dorset, Livingston, Arran, Kirkham and Batley as well as a central distribution hub in Liverpool. Our head offices are based in St. Albans and Batley. We also engage temporary labour at sites, via labour agencies and we outsource certain services to third party providers[ such are our central distribution hub in Liverpool.]

**Fox's Burton's Companies (FBC) UK Limited**

**Registered office:** 74-78 Victoria Street, St Albans, Herts, AL1 3XH. **Registered Number:** 02086754





FBC UK collaborates with a diverse range of trusted suppliers across the UK and Globally for sourcing our raw materials and packaging. These suppliers' range in size from small and medium-sized enterprises to large multinationals, each of which has its own supply chain. We source ingredients from 36 countries of manufacture and we sell to over 55 countries.

At FBC our Core Values are central to our way of doing business and provide us with the foundations for our strategies. They enable us to achieve success in the right way: Our core values are:

*Respect and Responsibility*

*Loyalty and Trust*

*Integrity and Moderation*

*Entrepreneurship*

*Passion for Quality, Research and Innovation*

*Work, Create, Donate*

### **Policies in relation to slavery and human trafficking**

FBC has developed a suite of policies to ensure ethical business practices are followed and these are supported by further procedures and guidance. Our approach is guided by international conventions and standards, including the Ethical Trading Initiative (ETI) Base Code.

### **Supplier Code of Conduct**

FBC's core philosophy is inspired by a solid commitment to ethical conduct and integrity. With this in mind, FBC UK commits to ensuring it and its partners and suppliers, adhere to strict ethical standards. FBC UK recognizes the value of third parties such as our suppliers, trade partners, distributors and vendors and through our Supplier Code of Conduct, we invite them to be united in our core philosophy, by sharing our expectations in terms of products safety, quality, sustainability, and business ethics, on a global scale. The Supplier Code of Conduct can be found on our intranet for all employees and on our website. Part of our supplier set up includes ensuring suppliers agree to abide by our Supplier Code of Conduct. We reserve the right to terminate our relationship with individuals or organisations working with us or on our behalf if they breach our ethical policies.

### **Human Rights Policy**

This policy reflects our commitment to respecting and promoting human rights and preventing and mitigating any adverse impact of our operations, through a due diligence-based approach to human rights. Our approach is guided by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labour Organization (ILO) Fundamental Labour Conventions. If there is a



conflict between these international standards and applicable laws, we comply with the applicable laws, while seeking ways to honour these international standards.

### **Speak-Up Policy**

We want to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery is taking place in our own business or wider supply chain.

This policy sets out various methods by which employees, suppliers and third parties can raise concerns about internal practices, employment standards or ethics. Whilst we always encourage concerns to be reported directly to management, FBC also provides a confidential hotline via both phone and web, which is available 08:00-18:00 Monday to Friday with an answerphone out of hours - and can be accessed online and by phone. The hotline is operated by an independent external organisation.

Any concerns reported via the hotline or through line management are referred to the Chief People & Organization Officer and the Chief Legal Officer. All matters are treated in the strictest confidence and investigated as quickly and thoroughly as possible.

No concerns related to modern slavery were raised in the year ending August 2024.

### **Grievance Policy**

The aim of the policy is to enable and maintain excellent employee relations at all levels. However, when an employee has a problem or concern about their work, their working conditions or relationship with colleagues the purpose of this Policy is to help guide them through a process to enable the Company to handle grievances fairly and in a timely manner.

### **Policy Implementation and training**

Each policy is assigned to a policy owner who is responsible for ensuring the policy is kept up to date and is properly implemented. We have a dedicated space on our intranet called the Compliance Hub where employees can refer to policies and helpful notes.

On joining the business, new starters are required to read key policies and undertake an induction programme. We have a new suite of training programmes both online and face to face.

Members our HR teams at both head office and site level have attended Modern Slavery workshops run by Stronger Together, a not for profit organisation, the focus of which is to help attendees understand the responsibilities and best practice associated with tackling modern slavery in UK businesses and to enable them to better identify instances of modern slavery should they exist in the workforce.

### **Due Diligence on Suppliers and Collaboration**



As a biscuit manufacturer, we have a large number of suppliers of ingredients, packaging and services. To ensure best practice throughout our supply chain, we have a comprehensive supplier and material approval review procedure. We request that all suppliers be members of Sedex (the Supplier Ethical Data Exchange).

As members of Sedex, we actively monitor the ethical standards to which we, and our suppliers, adhere to and it is the preferred method for ongoing assessment of our supply base. Approximately 98% of our supply base is Sedex registered, with remaining suppliers further screened on ethical standards prior to approval.

We also request supply chain maps from our suppliers that will show the route of the ingredients from source to delivery to ourselves. Our trading terms also require suppliers to perform services in accordance with ethical trading initiatives and industry standards and to adhere to our Code of Conduct.

FBC UK has long recognised the benefits of using ethically and sustainably sourced raw materials. We also only source cocoa based products from suppliers and/or supplier's suppliers that are members of the ICI (International Cocoa Initiative) or the WCF (World Cocoa Foundation). The ICI supports schemes and organisations that are working to eradicate child labour in the cocoa sector and the WCF funds work to ensure the sustainability of the cocoa industry through programmes such as The Sustainable Tree Corps Program and also helps improve the livelihood of cocoa farmers.

100% of direct palm oil sourced for our products is certified by the Roundtable on Sustainable Palm Oil (RSPO). Their requirements include respecting the rights of indigenous peoples and local communities and respecting workers' rights and conditions within palm oil plantations.

### **Employees/Agency Workers**

As part of our commitment to meet the same standards that we are asking of our supply chain, all our manufacturing sites are required to complete Sedex self-assessment questionnaires. All FBC manufacturing sites have been successfully audited against the SMETA 2 or 4 Pillar audit standard. This is completed on a two to three-yearly rotation. 2 audits took place in the financial year ending 26 August 2024 and 4 more are due in the next financial year. For transparency, these audit reports are published on the Sedex platform, so that our customers can view with whom we have been requested to link and share our data.

We are constantly reviewing processes in place and actions required to reduce all strategic risks associated with modern slavery, where economically possible. We have a robust recruitment process to ensure all right to work documents are checked before someone joins to ensure compliance.

We undertake checks on employee's bank accounts to identify any instances of multiple employees linked to one account. We continue to raise awareness in the business and have included additional information in our induction and employee learning platform.

### **Collaboration and Risk Assessment**

We have successfully passed third party audits which include checks on the systems we have in place to protect against modern slavery. We are pleased that we have not encountered any issues regarding this and as a company we are satisfied with the steps being taken.

**Fox's Burton's Companies (FBC) UK Limited**

**Registered office:** 74-78 Victoria Street, St Albans, Herts, AL1 3XH. **Registered Number:** 02086754





That said we are continuously monitoring (together with our suppliers) what steps we can take to build on the initiatives we already have in place. We aim to understand the potential risks to human rights such as forced labour within our supply chain by using tools such as the Sedex platform and audits where high risks are identified (SMETAs).

### Key Performance Indicators

We have introduced key indicators which we will use to not only monitor our own performance, but to report to external interested parties in progress against our policy and standards. These KPI's set out in Table 1 below, underpin our focus on improving modern slavery risk awareness and understanding across our business and through our supply chain.

### Focus Areas Going Forwards

Formalising a Modern Slavery Working Group to be made up of representatives from across the business including legal, procurement, HR, technical and sustainability teams and be championed by the Board. the group will have a clear governance including reporting lines and terms of reference so it can set strategy, review risks and oversee actions and mitigations.

Engaging a Modern Slavery specialist partner to conduct gap analysis and establish modern slavery action plan.



Table 1:

KEY PERFORMANCE INDICATOR	RESULT 2023	TARGET 2024	RESULT 2024	TARGET 2025
% of Sites that have completed Stronger Together Training*	90%	100%	50%	100%
% of Sites that have completed the Modern Slavery Risk Assessment action plan	25%*	100%	50%	100%
% of Sites that have completed an agency ethical audit every 12 months	100%	100%	100%	100%
Number of Whistleblower Cases relating to Modern Slavery	0	0	0	0
% of Whistleblower Cases closed out	N/A	100%	N/A	100%
% of raw material suppliers registered on SEDEX	96.5%	98%	98%	98%

\* We are looking to expand the training to include managers as well as the HR team for 2025 and training has been organised





Fox's Burton's Companies (FBC) UK

Signed by:  


Signed by SIMON BROWNE, CEO .....  
9938FA834F57453...

Signed by:  
*Marco Serra*

Signed by MARCO SERRA, Chief People & Organization Officer.....  
8B8A6136663C44B...

On behalf of Fox's Burton's Companies (FBC) UK Limited

