



## **Modern Slavery Statement 2019**

Slavery, forced labour and human trafficking are issues of growing global concern, affecting all sectors, regions and economies. Modern slavery is fundamentally unacceptable within our business and supply chain and combatting it is an important element of our overall approach to business and human rights. Edible Oils Limited is committed to respecting, protecting and championing the human rights of all those who come into contact with our operations.

This statement has been published in accordance with the Modern Slavery Act (2015) and provides an update on our activities and commitments to prevent modern slavery in our operations and supply chains, and sets out the steps we have taken during the financial year 2018/2019 which ended on 31<sup>st</sup> March 2019.

### **About Edible Oils Limited ('EOL')**

EOL is a manufacturer and distributor of edible oils and white fats to the retail and food service sectors. It is a joint venture between Princes Limited and Pura Foods Limited, whose ultimate parent companies are Mitsubishi Corporation and Archer Daniels Midland Company Inc. respectively.

EOL has over 150 employees with production sites in Erith and Belvedere in Kent, England.

### **Relevant Policies and Contractual Controls**

EOL is committed to upholding human rights and fully supports the UN Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

The United Nations Sustainable Development Goals (SDGs) have been developed to make the world more sustainable by 2030 in challenges as diverse as ending poverty to tackling climate change.

EOL supports the aspirations of the SDGs and we have identified specific Goals where we think we can make a real contribution related to our areas of expertise and main areas of operation. This includes Goal 8: Decent Work and Economic Growth.

The EOL Code of Conduct, which is subject to regular review, provides guidance to employees on local laws and global standards such as the Universal Declaration of Human Rights. All employees must use the Code of Conduct as a guide in daily operations, to be aware of their responsibilities including as to slavery and human trafficking, to review the relevant laws and internal company rules and to conduct themselves with integrity.

Our Ethical Trade & Human Rights Policy was established in 2013 and is reviewed on an annual basis. It requires adherence to all international norms and codes regarding human rights, including the Universal Declaration on Human Rights ([www.un.org](http://www.un.org)) and the core labour standards of the International Labour Organisation (ILO) ([www.ilo.org](http://www.ilo.org)).



It is a requirement for EOL's suppliers to comply with (i) all applicable local and international laws, which would include those relating to labour used in the supply of finished goods and raw materials, and (ii), contractually, to the principles of the EOL Code of Conduct, which incorporates respect for human rights and the EOL Ethical Trade & Human Rights Policy.

## **Our supply chains**

We take a partnership approach with suppliers, seeking to foster long term supply agreements in order to provide the security and integrity, including respecting human rights and combatting slavery and human trafficking that we, our customers and consumers demand.

Our suppliers provide both finished goods and raw materials for manufacturing across all of our core product areas, which are edible oils and fats.

## **Risk Assessment and Due Diligence**

Risks of modern slavery are dynamic and can quickly evolve. As a result we regularly assess and respond to risks in our business and wider supply chain.

All EOL owned sites are registered on SEDEX (Supplier Ethical Data Exchange), a not for profit organisation dedicated to driving improvement in responsible and ethical business practices in global supply chains.

SEDEX provides us with an initial risk assessment for suppliers and supply chains with country and product category specific intelligence. This allows us to monitor and mitigate the risk of slavery and human trafficking by providing insight into any high risk areas. In addition, our own knowledge and experience from cross functional teams, allows us make informed risk assessments for specific raw materials, sectors and countries.

We use SEDEX to help us assess risk and manage compliance across our manufacturing sites and direct suppliers.

Our risk assessment shapes our future purchasing strategy, audit schedule and any remediation action necessary with the supplier or, using our influence, to instigate positive change in the wider supply chain or industry.

All employees receive the EOL Code of Conduct and are given regular training which is monitored by our Compliance Committee.

We actively support employee engagement, representation and the ability of an employee to raise concerns. Freedom of association and the right to collective bargaining are core labour standards that we respect, as guided by the ILO. We apply our employment practices to ensure they meet, as a minimum, legislative requirements.

Both of our UK production sites are also SEDEX (Supplier Ethical Data Exchange) registered and undergo regular audits.

All temporary agency labour currently used in our UK operations is provided through Association of Labour Providers member companies who are registered Stronger Together Business Partners. They all have a documented Hidden Labour Exploitation Policy and



have demonstrated a commitment to raising awareness of hidden labour exploitation through their processes and through communicating key indicators to operational staff. We are also enhancing our audit process taking into account the Stronger Together Checklist, annual assessments and action plans.

A number of companies provide services to our production sites such as cleaning, security and staff restaurants. In 2018/19 we continued to proactively engage with all third party companies that provide services to our operations. We consider the greatest risk of slavery and human trafficking is in our supply chain to be where we undertake procurement activities and where operations and direct managerial oversight are out of our direct control.

### **Monitoring and Auditing**

Via our Ethical Trade & Human Rights Policy, we communicate to all our suppliers that EOL may conduct risk assessments and onsite evaluations of suppliers including requiring independent ethical trade audits to be undertaken at appropriate intervals.

If we identify cases of non-compliance to our Policy or any relevant legislation we communicate our remediation requirements and provide support for redressing specific issues. If the supplier is unable to satisfactorily address these issues, we reserve the right to terminate business with immediate effect. This is a provision in our Standard Conditions of Purchase.

In the event of evidence of a labour violation in our upstream supply chain we will address the issue with our supplier but also seek to work with relevant stakeholders such as government, appropriate trade bodies and Non-Governmental Organisations in order to resolve issues. If it is possible to identify individual cases of unethical working practices we will eliminate the individual supplier from our supply chain if remediation action is unsatisfactory.

### **Key Performance Indicators**

EOL is committed to measuring and monitoring our ethical trading performance to maximise focus within our business and supply chain. We will now be measuring ourselves against the following indicators below, and we will review our progress in our 2020 Modern Slavery Statement:

- Reported incidences of modern slavery at our EOL UK sites.
- Number of third party ethical audits undertaken within our EOL UK sites.
- Number of overdue and outstanding Business Critical and Critical Non-Conformances within our EOL UK sites.

#### Business Critical and Critical Non-Conformances

EOL uses the Sedex Members Ethical Trade Audit Non-Compliance Guidance to assess the significance of a criticality of an audit non-conformance.

A Business Critical Non-Conformance (NC) represents a critical breach of an ETI base code item or local law resulting in an issue which presents a critical or imminent risk to worker's safety / critical risk to life and limb or which constitutes a critical breach of workers' human rights. This may put either new business or ongoing business at risk and will therefore require immediate correction or improvement.

A Critical NC is a severe breach which represents a danger to workers / those on site, or which constitutes a severe breach of workers' human rights; a severe material breach of an ETI base code requirement / law; a systematic and deliberate breaking of a code requirement / law; an attempt to pervert the course of the audit through fraud, coercion, deception, interference or deliberate damage to brand reputation; or a major non-compliance that has not been addressed over time, or for which no significant improvement has been made.

As of 31<sup>st</sup> March 2019 we had zero overdue and outstanding Business Critical or Critical Non-Conformances within our fully owned or joint venture sites. We also had no reported incidences of modern slavery at our EOL UK sites during the year.

### **Partnering to address root cause issues**

EOL recognises the benefit in collaborating with third parties to drive meaningful change and address some of the root cause issues of large and complex modern slavery incidences. Our collaborative partners include:



### **Ethical Trading Initiative (ETI)**

ETI is a leading alliance of companies, trade unions and non-governmental organisations that promotes respect for workers' rights around the globe. The ETI was founded in 1998 in response to growing concerns about the poor pay and conditions of workers in many international supply chains.



### **Food Network for Ethical Trade (FNET)**

FNET is a network of UK food companies collaborating to improve working conditions in supply chains.

The activities of FNET consist of supplier support, tools including risk assessment and guidance, collaborative working and joint learning to form a framework for identifying, managing and responding to global food supply chain ethical trade risks.

### **Indirect Procurement Human Rights Forum (IPHR)**

Princes are part of a ground-breaking initiative which, through industry-wide collaboration, is looking to improve the human rights of workers in indirect procurement (also known as Goods and Services Not for Resale) supply chains.



Our aim is to work with like-minded organisations to share insights, best practice examples, build capacity and identify opportunities to act as one collective voice to address human rights issues in this sector.

We are currently working together to focus on the identification and mitigation of ethical risks within:

- Labour Providers,
- Waste Management,
- On-site Services.



### **Supplier Ethical Data Exchange (Sedex)**

Sedex is one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains, used by more than 55,000 members in over 180 countries. Sedex is one of the ethical trade organisations that we require our suppliers to be members of, as part of our Ways of Working requirements. The platform can be used by buyers, suppliers and auditors to quickly identify and share indicators of forced labour and modern slavery.

### **Sedex Stakeholder Forum (SSF)**

The Sedex Stakeholder Forum (SSF) brings together leaders from across the ethical trade and responsible sourcing industry to discuss the challenges they face and solve collaboratively. The forum is also home to SMETA, one of the world's most widely used audit formats.



### **Stronger Together**

Stronger Together provides training, resources and support for raising the awareness of how to spot the signs of modern slavery, and how to approach modern slavery in value chains. Please see one of our case studies for more information about our involvement in this initiative.

### **Training & Awareness Raising**

We continue to use the Modern Slavery Act (2015) as an opportunity to embed greater understanding of human rights within our supply chains, and to extend this awareness as far down our supply chain as possible.

Over the past twelve months our programme of training and awareness raising has included:

- Updating our internal Ways of Working management system to support the identification of labour standard abuses, mitigate risks and drive improvement.
- Developing and updating our Supplier Guidance Document to all of our tier one suppliers to communicate the risks around modern slavery.

- Continuing to publish our Supplier Ethical Newsletter which is issued to all tier one suppliers to both provide them with useful legal and industry updates as well as enhance supplier knowledge, understanding and engagement in ethical trading. By highlighting work we are doing we demonstrate the importance we attach to this issue.
- Undertaking specific training for our Human Resources, Technical, Sales and Commercial (Procurement) teams on the issues of modern slavery and human trafficking.
- Our Ethical Trading Controller completing Stronger Together / Gangmasters & Labour Abuse Authority training on Investigative Interviewing Skills in order to support potential victims of modern slavery.

### **Priorities for the coming year**

Within the context of our broader human rights commitments, we recognise the importance of maintaining constant vigilance to identify and address any activities associated with slavery and human trafficking throughout our global operations and supply chains.

In recognition of the importance of these issues, we are committed to continuing to enhance our capacity to identify, prevent and mitigate any actual or potential activities in this field.

In the coming financial year we will continue to increase awareness of ethical trading and modern slavery with all relevant and internal stakeholders as well as with our direct suppliers. We will also use one of our shareholding companies, Princes Limited's, membership of the ETI to help us further understand human rights issues in our supply chain.

### **Approval**

I, Mark Church, hereby certify that the information contained in the above statement is factual and has been approved by Edible Oils Limited's Board of Directors.



Mark Church  
Managing Director (Edible Oils Limited)  
September 2019