



## **2017 Slavery and Human Trafficking Statement**

### **About the statement**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2017.

A core principle of our corporate responsibility is being a fair partner and good employer and we work directly with our suppliers to ensure good working practices throughout the supply chain.

We are committed to improving our practices to combat slavery and human trafficking. We will not knowingly work with suppliers who fail to protect the rights of employees, or engage in slavery, trafficking or any other form of human rights abuse.

This statement is intended to communicate the steps that Edible Oils Limited has taken to ensure that slavery and human trafficking are not occurring in any part of our business or supply chain.

The statement sets out the steps we have taken to prevent modern slavery and human trafficking in our business during our financial year 2016/2017 which ended on 31st March 2017.

### **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.

### **Policies and philosophies**

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 Trading 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 Trading 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.

## **Due diligence and risk assessment**

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 and undertake annual audits.

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 are issued with the EOL Code of Conduct and 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 annual audits.

All agency labour currently utilised in our UK operations is provided through a business accredited by the Association of Labour Providers and who is a Stronger Together registered business partner. They have a documented Hidden Labour Exploitation Policy and are committed to raising awareness of hidden labour exploitation through its processes and through communicating key indicators to operational staff.

A number of companies provide services to our production sites such as cleaning, security and staff restaurants. In 2017 we commenced proactive communication to these service providers on the Modern Slavery Act to promote awareness and remind them of their legal and contractual obligations. We will continue to actively engage with all third party companies that provide services to our operations.

We consider that the greatest risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and direct managerial oversight are out of our direct control.

If we identify cases of non-compliance to our Ethical Trading 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 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-Government 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 or untimely.

## **Training**

In addition to our existing schedule of compliance training, in 2017 we completed specific training on the issues of modern slavery and human trafficking for all employees. This training is monitored by our Compliance Committee. Key Buying, Technical and Human Resources personnel also received training specific to their function in relation to ethical trading.

## **Our effectiveness in combating slavery and human trafficking**

We do not currently have key performance indicators specifically in relation to slavery or human trafficking as any instances of these would be a non-compliance and breach of employment laws, our own employment practices, Code of Conduct and Ethical Trading Policy. However, the practices that relate to the mitigation of slavery or trafficking risk do have internal performance measures.

In our own operations, any alleged breach of the Code of Conduct or Ethical Trading Policy is investigated and recorded as a matter of compliance where relevant by the EOL Compliance Officer

In our supply chain, we monitor supplier SEDEX membership and Self-Assessment Questionnaires, which include investigation and time-bound actions to follow up and close out any non-conformances raised.



During the year ending March 2017 one of our shareholding companies Princes Limited defined a specific ethical trading vision and strategy for the Group and its suppliers to work towards compliance of the Ethical Trading Initiative (ETI) Base Code.

Foundation stage membership of the ETI was confirmed in May 2017 for Princes Limited.

## **Looking ahead**

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.

## **Approval**

I, Kazuhito Suematsu, hereby certify that the information contained in the above 2017 Slavery and Human Trafficking Statement is factual and has been approved by Edible Oils Limited's Board of Directors.

A handwritten signature in cursive script, reading "K Suematsu".

Kazuhito Suematsu  
Director & Company Secretary  
Edible Oils Limited  
August 2017