

Modern Slavery Policy

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Aims of this policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third party representative.

We expect all who have, or seek to have a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

What do we mean by modern slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

Slavery: where ownership is exercised over an individual

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Servitude: involves the obligation to provide service imposed by coercion

Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.

Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

How we seek to embed our anti-slavery policy in practice

To underpin our policy commitments, we have implemented a Supplier Code of Conduct (see Appendix 1). We require our suppliers as a Group to confirm the following:

- That our (direct) suppliers have to accept the supplier code of conduct in which they commit to avoid modern slavery. As they need to accept this document as a first step before even getting access to our tenders we can consider this step a pre-screening. We do not do any active pre-screening on the effectiveness of the controls suppliers have in place. We only ensure that we have the right to make controls if necessary.
- The contractual documentation we have for this is the Supplier Code of Conduct as a stand alone document. This COC includes the right to terminate the contract in case of the supplier being in breach with the COC. But in our Code of Conduct we do not go to the second or third tier supplier range as requested in the policy attached (suppliers of our suppliers).

The VANDEMOORTELE Group Supplier Code of Conduct is applicable for all companies of the VANDEMOORTELE Group (VANDEMOORTELE NV and affiliated companies).

This VANDEMOORTELE Group Supplier Code of Conduct forms an integral part of the VANDEMOORTELE General Purchase conditions for the delivery of ingredients and packaging and the VANDEMOORTELE General Purchase conditions for the delivery of goods, services and works (consultable on <http://www.vandemoortele.com/en/terms.htm>)

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Responsibility for this policy

The Leadership team have overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The appropriate management team member will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

Communication and employee awareness training

The HR Manager will ensure that all relevant staff receive adequate training on this policy and any supporting processes applicable to their role. Such training forms part of the Company's induction processes.

In addition staff will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and the identify individuals/areas of the business that may be at risk from practices of modern slavery.

Breaches of this policy

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the Leadership Team/HR Manager.

Status of this policy

This Anti-slavery policy will be reviewed by the UK's Leadership Team on a regular basis at least annually.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

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APPENDIX 1

VANDEMOORTELE Group Supplier Code of Conduct for delivery of goods, services and works.

VANDEMOORTELE'S SUPPLIER CODE OF CONDUCT

In line with our mission statement, guiding principles and sustainable development policy, VANDEMOORTELE is committed to ensure responsible conduct on ethical, social and environmental issues. This Code of Conduct summarises the requirements to which VANDEMOORTELE adheres and which VANDEMOORTELE also asks its suppliers to commit.

These requirements are prepared in accordance with the 10 principles of the UN's Global Compact.

Business is conducted lawfully and with integrity All forms of corrupt practices, such as bribery, extortion, fraud and unlawful restrictive trade practices are strictly prohibited.

Working environment and social conditions comply with international frameworks The supplier shall support, and respect internationally declared human rights and treat its employees fairly, equally and with respect.

All workers enjoy freedom of association All workers are free to exercise their right to form and/or join trade unions or to refrain from doing so and to bargain collectively.

Work is conducted on a voluntary basis No form of forced labour or compulsory labour is permitted.

All workers are of an appropriate age Child labour is not accepted. The age limit set in the laws of each country shall be respected and regardless of the country's legislation children under the age of 14 years shall never be hired. The supplier must not employ any young workers under the age of 18 to perform any work that is likely to be hazardous or harmful to their health and safety.

Working hours for all workers are reasonable Working hours must comply with national legislation and agreements with trade unions.

All workers are paid fair wages Wages, benefits and overtime compensation shall at least comply with national legislation and agreements. The wages of employees are paid on a regular basis.

All workers are treated equally and with respect and dignity No worker shall be subject to any physical, verbal or psychological abuse or other form of intimidation. There is no

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discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on ethnic groups, colour, gender, political or religious convictions, belonging to a union or a specific social environment, or any other situation is prevented.

Worker's health and safety are protected Health, safety and other workplace standards must meet all local laws and safety regulations. Accidents and work-related injuries have to be prevented.

Business is conducted in a manner which reduces environmental impact The supplier shall comply with national laws and shall adopt a precautionary approach in its business operations. VANDEMOORTELE expects its suppliers to actively work on emission reductions to the air, soil and water and on more efficient use of natural resources.

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Supplier declaration

The undersigned supplier has read the Code of Conduct, and understands that business with VANDEMOORTELE depends upon full compliance with this Code. VANDEMOORTELE reserves the right to make inspections to ensure that this Code of Conduct is being enforced.

These inspections may be performed by an independent third party and may be unannounced. In case the supplier fails to comply with the terms of this Code of Conduct and if improvements are not made within an agreed time period, VANDEMOORTELE may terminate its business with the supplier.

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The supplier is by its signature below committed to this Code of Conduct.

Company: _____

Date: _____

Signature: _____

Print name/Title: _____

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