

Modern Slavery Statement

This statement is made in accordance with the Modern Slavery Act 2015 and outlines the steps pladis UK & Ireland has taken, as well as its future plans, towards the prevention of forced labour and human trafficking within its organisation and supply chain.

pladis UK & Ireland is a trading name of United Biscuits (UK) Ltd.

Business Organisation and Structure

pladis was formed in 2016 and is the proud steward of more than 300 years of family baking and confectionery experience. As one of the world's leading snacking companies, it is home to beloved brands including McVitie's and Ülker. pladis is also proud to distribute a range of GODIVA chocolates exclusively for consumer-packaged goods channels around the world.

Within the pladis UK & Ireland business, there are over 4,000 employees across seven bakeries and one distribution site. We have circa 3,000 suppliers who are a core part of our business success.

Our Processes and Policies

We operate according to the pladis Code of Conduct which captures the most important responsibilities expected of our colleagues as they go about their work. We expect our suppliers to adhere to the Code and we do not work with suppliers who violate human rights standards.

In 2019, we continued to use our improved self-audit supplier questionnaire, to which we had added specific questions relating to human rights in 2018, to approve new suppliers. In 2020, our aspiration is to use the new Sedex self-assessment questionnaire and risk assessment tools, and to embed them into our pladis UK and Ireland supplier approval process.

As part of doing business with pladis UK and Ireland, raw materials and packaging suppliers must become members of the ethical due diligence platform, Sedex, and complete the self-assessment questionnaire, which allows us to identify higher risk suppliers. In 2019, we had zero high risk suppliers in our UK & Ireland approved list. In 2020, Sedex will have revised its self-assessment questionnaire and our aspiration is to support the implementation of this document within our pladis UK and Ireland supply chain.

pladis operates a whistleblowing policy which encourages colleagues (including agency workers and contractors) to report any circumstances of potentially unethical conduct within our organisation. This was reviewed and updated in 2018. At the same time, we completed the roll out of our new pladis ethics hotline providing colleagues with the facility to raise any concerns confidentially with an independent provider via telephone or website. At the time of its launch we briefed all UK & Ireland employees on its purpose and how to use the service. The details of the ethics hotline are displayed on noticeboards across all our manufacturing and distribution locations. They are also communicated to all our new starters. During 2019, all our supply chain colleagues were reminded every six months on these facilities.

We continue to work closely and engage with our trade union partners by providing updates on progress being made, during our quarterly consultation and communication forums.

Our Suppliers

We see our suppliers as partners and we recognise the importance of working closely with them to ensure that they act responsibly.

Following on from our supply chain mapping exercise in 2017, we continue to work towards strengthening our processes and focus on our key raw materials.

In 2019, we continued our responsible wheat sourcing programme with our wheat suppliers and have maintained 41% traceability back to farm, up from 30% in 2017.

We also initiated our responsible palm oil programme. As part of this programme we continue to be a member of the Earthworm Foundation (formerly The Forest Trust) to improve traceability back to mill for all the palm oil we use. We are identifying on the ground transformation programmes that will fight deforestation and provide support to workers at origin.

Ongoing Due Diligence

As a member of the ethical due diligence platform, Sedex, all our UK sites undergo regular Sedex Member Ethical Trade Audits (SMETA) and customer audits, to ensure we are compliant with the required standards.

At the end of 2018, we implemented an improved audit process for our onsite agency labour providers. Building on our existing process, which ensures we are able to measure compliance against the Ethical Trading Initiative (ETI) base code and to identify general good practices, we now focus specifically on the modern slavery policies, training and awareness programmes, monitoring controls and transparency of recruitment processes that our agency labour providers have in place. This has continued in 2019, with the addition of auditing security services at all sites. In 2020, we will extend the audit process to some engineering services.

As part of our supplier due diligence process and contractual terms, we require our raw materials and packaging suppliers to become members of Sedex. In 2020, Sedex will have revised its self-assessment questionnaire and our aspiration is to support the implementation of this document within our pladis UK & Ireland supply chain.

Capacity Building through Human Rights training

When we designed and launched Modern Slavery Awareness Training for colleagues in 2017, we set ourselves the ambition of ensuring that one third of all our employees and managers in our factories would complete the training each year, on a rolling basis. At the end of 2019, 83% of managers and 46% of employees have achieved this.

In addition, against a similar rolling target, 48% of our UK & Ireland colleagues have completed training designed to ensure an understanding of the pladis Code of Conduct.

We will continue with our rolling plan to provide Modern Slavery Awareness Training to all manufacturing employees, aiming to complete all this training during the second half of 2020.

Future Plans

In 2019, we worked with Impactt Ltd on a standard presentation to interact with our colleagues on human rights. From 2020, this presentation will be used to deliver specific training on human rights for functions such as procurement and Safety, Quality, Security and Environment (SQSE) teams, who have direct relationships with our suppliers. Our objective is to build more ethical and human rights expertise within the procurement and SQSE teams.

We will update our sustainability approach, including for human rights compliance with commodities at risk.

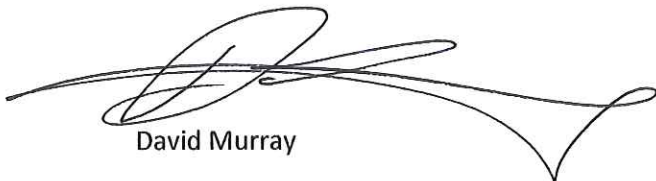
In 2020, Sedex will have revised its self-assessment questionnaire. Our aspiration is to support the implementation of this document within our pladis UK & Ireland supply chain, and to expand the Sedex programme to require agents, warehouse and SQSE approved service suppliers to use the Sedex self-assessment questionnaire.

At our manufacturing and distribution sites, we will continue with the implementation of our ethical audit process to our agency labour providers, hygiene services providers and security services. In 2020, we will include some engineering services into the scope of the audit process. Through this, we hope to see the adoption of improvements in the way they manage and support their employees and ensure the risks of modern slavery in their own operations and onward supply chains are effectively managed.

Following our initial launch and communication of the global ethics hotline in the last quarter of 2018, we will continue to ensure our employees are re-briefed regarding the process, its purpose, its confidential nature and how it should be used to raise a genuine ethical concern.

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 and constitutes the pladis statement for the financial year commencing January 2019 and ending December 2019.

The Board of United Biscuits (UK) Ltd has reviewed and approved the statement and it has been signed on their behalf.

A handwritten signature in black ink, appearing to read 'David Murray', with a large, sweeping flourish extending to the right.

David Murray

Managing Director, pladis UK & Ireland