



## **Our statement on modern slavery**

Noble Foods is committed to preventing slavery and human trafficking in all of its activities and will require that its suppliers have the same commitment.

As a responsible company we always strive to do the right thing, we have had robust practices and policies in place for many years to help us meet this objective.

Entities that are within Noble Foods Group that are required to comply with the provision to produce a modern slavery statement are: Noble Foods Ltd, Noble Desserts Holdings Ltd, Noble Foods and Noble Egg Innovations Unltd.

### **Our Business - Noble Foods Group**

Noble Foods are the leading supplier of fresh eggs to UK retailers.

Many of Noble's eggs come from independent egg farms (we work with approximately 400 across the UK) in many cases with hens and feed also supplied by us. Company owned farms complement this egg production. Additionally we have 14 Company owned rearing farms and we rear around 4 million pullets per year. Our rearing farms provide birds for both Company owned laying farms and for sales to independent producers.

Our Milling Division is fully approved under the feed industry's Universal Feed Assurance Scheme (UFAS) and registered with the British Egg Industry Council Lion scheme. All mills are registered to manufacture medicated feeding stuffs, registered with the Local Authority under Feed Hygiene Regulations and are fully approved under a number of retailer schemes. We currently manufacture in excess of 750,000 tonnes of feed annually.

Our Poultry Processing Division is the largest spent hen and broiler breeder processing operation within the UK. Processing to the very highest welfare standards required by our customers and the RSPCA, the site is Freedom Foods approved and currently accredited to the BRC AA standard.

In 2010 we acquired Gü which manufactures premium desserts for distribution in the UK and Europe.

In 2015 we acquired a renewable energy company, now named Noble Green Energy, this Company focuses on supporting farms reducing their energy costs by employing sustainable practices.

Noble Foods plays a proactive role in the eradication of modern slavery and in of its practices, actively supporting the "Stronger Together" initiative and promoting best practice within both our organisation and that of our suppliers. We are building on this strong foundation by incorporating our policies and procedures into everything we do. We strive to work with our suppliers to build effective and transparent supply chains.

We expect our suppliers to operate to the same ethical standards that we employ ourselves. Noble Foods is an AB Member of Supplier Ethical Data Exchange (SEDEX) and we have been building SEDEX membership progressively across our group and supply base.

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

Noble Foods policies clearly state that we will not tolerate forced labour (including human trafficking) or child labour in our operations or operations related to supply to Noble Foods. We conduct internal and external audits to ensure compliance, we work collaboratively and proactively with the GLA and operate the following policies that describe our approach to the identification of modern slavery risks, together with the steps to be taken to prevent slavery and human trafficking in our operations:

Noble Foods will not knowingly use any individual or organisation to source and supply goods or workers using practices of forced labour or human trafficking for labour exploitation. We will report any evidence or suspicion of cases of hidden third party labour exploitation to the GLA immediately. Failure by managers and leaders of the Company, third party labour providers or organisations in the supply chain to act upon concerns of worker maltreatment, coercion or harassment will be regarded as a gross misconduct offence or breach of contract and will be managed accordingly through the relevant disciplinary or contractual termination processes.

**Whistleblowing Policy.** Noble Foods actively encourages all its employees to report any concerns that raise suspicions related to human trafficking, both inside our organisation and through the supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Noble Foods whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. In 2017 Noble Foods introduced the Safe Call confidential and anonymous whistleblowing hotline.

**Recruitment Policy.** Noble Foods will not use any individual or organisation to source and supply workers using practices of forced labour, human trafficking for labour exploitation, payment for work-finding services or any work-related exploitation such as forced use of accommodation. Noble Foods will confirm (through their own recruiting processes or through the recruiting processes of third party agencies) that workers are not subject to any of the above practices and will report any evidence or suspicion of cases of hidden third party labour exploitation to the GLA immediately.

**Agency workers.** Noble Foods uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Regular audits of a random selection of agency workers, regular audits of each agency as well as audits of new agencies beginning to supply Noble Foods are part of the processes by which risks of slavery and human trafficking are addressed in relation to agency workers. All agencies used for temporary labour in the manufacturing of our products are licensed by the GLA. We actively check these and audit them on a regular basis. Temporary workers are also interviewed to look for signs of any potential breaches.

**Business Integrity Policy.** Noble Foods Business Integrity Policy clearly communicates to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour including when operating abroad and managing its supply chain.

## **Due diligence**

Noble Foods undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- broadly mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking;
- conducting supplier audits or assessments through Noble Foods own staff and third party auditors which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through own staff/ third party auditors and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular ("Stronger together", "Ethical trading" initiatives).

## **KPI's**

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015.

As a result we:

- require all staff to receive Stronger Together training and will continue to train new staff;
- are continuing the programme to deliver Stronger Together training throughout our egg supply chain;
- continue to provide training and awareness for supply chain representatives;
- continue to conduct audits and ethical visits with suppliers;
- continue to develop a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain and continually reviews its existing supply chains, with the use of SEDEX, FNET and our audit program;
- continue to work together as an active member with the Food Network for Ethical Trade;
- have articulated formally our expectations of high ethical standards, of those with whom we conduct business, including those businesses with which we have continuing supply relationships through the issuing of a Supplier Code of Conduct.

## **Relevant training**


Noble Foods provides information on "Hidden Labour Exploitation" to our workforce through a variety of formats such as workplace posters, worker leaflets, staff presentations during the induction and training period and through internal auditing processes. The company also actively encourages workers to report cases of hidden third party labour exploitation, provides the means to do so and investigates and acts upon reports appropriately.

The 'Stronger Together- Understanding & Tackling Modern Slavery' course content has been delivered to operational employees of Noble Foods and will continue to be provided to all new employees in order to educate the workforce and enable them to recognise and report the symptoms of slavery and human trafficking.

In 2019 Noble Foods will continue to deliver Stronger Together training throughout the egg supply chain.

This statement will be reviewed and published annually

This statement was approved by the board of Noble Foods.

A handwritten signature in black ink, appearing to be 'Dale Burnett', written over a horizontal line.

**Dale Burnett**

**Chief Executive Officer**

**19<sup>th</sup> March 2019**