



# Slavery and Human Trafficking Statement

## Introduction

We are committed to ensuring that there is no slavery or human trafficking in our supply chains.

It is our policy to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place.

## Due Diligence Processes for Modern Slavery and Human Trafficking

We monitor ethical standards across the business on a regular basis, both internally and via third party audits. Our sites undergo unannounced SEDEX members Ethical Trade Audits by authorised auditing bodies. Where our suppliers are not on SEDEX, they are required to complete our Ethical Questionnaire (based on the ETI base code and Human Rights Act).

This is also supported by our Ethical Policy, our Equal Opportunities Policy and our Health and Safety Policy.

Country Style is a business partner of Stronger Together – the hidden labour and human trafficking initiative. We have been part of this initiative since 2013, when it was first initiated.

- A Hidden Labour Policy is signed by the Managing Director and trained out to all managers, supervisors and key staff within our structure.

- The policy is on display at all our sites, on the Stronger Together notice boards.
- Senior Managers attend the Stronger Together hidden labour official training.
- A hidden labour action plan – in the event of hidden labour being discovered, comprising of comprehensive details of proceedings following the discovery.
- Compliance by our labour providers – verified by our agency audit that is now designed around the ETI base code and tackling hidden labour principle.
- A proactive reporting system in the event of discovering hidden labour/slavery.
- Training to all key staff with regards to the signs to look out for (alert flags), good practise when dealing with colleagues who may need investigation and general training to all employees in the form of notices, posters, leaflets, videos and induction handbooks.
- Anonymous interview forms in quiet areas, Multilanguage posters and leaflets on notice boards/quiet areas (toilets) and face-to-face interview forms for when suspicions are raised about an individual.

## **Our Supply Chains**

Supply chain security and integrity is a crucial to us. Robust technical and traceability systems ensure that our products are responsibly sourced. We use labour Providers to supply a percentage of our workforce. Each Labour Provider is audited against our own Labour Provider audit standard by our trained Ethical auditors every 6 months. The Labour Provider audit standard is based on the ETI base code, Human Rights Act, SEDEX compliance, The Modern Slavery Act 2015 and our Stronger Together Policies and Procedures.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains, we provide training to our staff. Many of our senior managers have attended the ‘Stronger Together – Tackling Modern Slavery in Supply Chains’ workshops. The Technical teams who manage our supply chain have been trained in Ethical awareness and the

Stronger Together initiatives. Every colleague within the business has received Ethical awareness and Stronger Together training at induction.

## **Key Performance Indicators**

- All of our sites are to become Stronger Together Business partners.
- Every ingredient, all packaging and every service we use will continue to be approved ethically using our indepth approval process.
- Every employee and worker to be familiar with our Ethical standards and policy of ensuring no slavery is occurring within our business or supply chain.
- 100% compliance with our labour providers against our agency audit programme set up using the ETI base code principles, human rights and compliance to SEDEX.

## **Whistleblowing Policy**

The business has a Whistleblowing Policy to facilitate employees to voice any concerns that they have. The Whistleblowing Policy is displayed at all sites to ensure that all employees and temporary workers have access to it.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's Slavery and Human Trafficking statement for the last financial year ending 31 December 2018.