

## **Frank Roberts & Sons Limited Modern Slavery Act statement**

This is our fourth statement under The Modern Slavery Act 2015 and relates to our financial year, 1 September 2018 – 31 August 2019.

### **Our business**

There have been no significant changes to our business profile and structure over the last 12 months. Frank Roberts and Sons Limited is a fourth generation family owned business with an annual turnover of almost £100m. We manufacture a variety of bakery, bread, morning goods and sweet treats products from our two premises in Northwich, Cheshire and Ilkeston, Derbyshire, employing up to 800 people across the two locations.

We are passionate about our values of courage, quality, community, nurturing and togetherness, seeking to bring them to life in every aspect of our business including relationships with our employees, customers and suppliers.

Most of our suppliers are UK based, though we source some ingredients, packaging and equipment from around the world. We also employ some temporary and contract staff, both directly and through agencies, whilst outsourcing security, catering, cleaning and laundry services and some distribution to third party providers.

### **Our policy on Modern Slavery**

Our Modern Slavery Policy is now incorporated into a broader Ethical Trading Policy, which includes our stance on Human Rights.

We remain absolutely committed to ensuring that there is no form of modern slavery within our supply chain and business operations.

We strongly condemn any form of slavery, human trafficking or treatment which violates the human rights of any person. We do not knowingly support or engage with any business involved in these practices.

Over the last 12 months, we have:

- updated our policy to embrace a holistic approach to ethical trading, modern slavery and human rights, including a definition of employees' responsibilities;
- implemented a new data management system, Source Dogg, which automates and streamlines our front-end source to contract process, initially for raw material suppliers. This requires suppliers, amongst other things, to provide their Modern Slavery Policy or sign up to ours;
- achieved the KPIs we established on monitoring, policy development and education of staff;
- deployed the Stronger Together questionnaire to benchmark our practice and identify any areas for improvement;
- continued to have a Modern Slavery awareness section in our employee induction process and junior management development programme, including the Stronger Together video;
- continued to display information and posters, provided by Stronger Together, around the business to encourage employees to be vigilant and to highlight any concerns about any of their colleagues or any of our operations;

- re-published our Whistleblowing Policy to all operational staff, including customer specific arrangements and uploaded onto our new employee app; and
- audited our Agency provider across a range of areas for compliance, including Modern Slavery and National Living Wage.

### **Our approach to due diligence**

We have extended the membership of our Steering Group to take account of the broader remit across ethical trading. This Group reports to the Board once a year. We are reshaping our Action Group whose primary role is to map out and audit our supply chain and products, assess and manage risk, report on KPIs and make recommendations to the Steering Committee in terms of best practice and next steps.

We remain members of the Supplier Ethical Data Exchange, (Sedex), a not-for-profit organisation whose members collaborate to promote responsible and ethical business practices within their supply chains. We actively encourage our suppliers to join Sedex within 12 months of working with us.

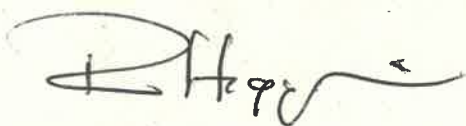
We continue to carry out a vendor assessment process on a regular basis for all our suppliers to ensure they comply with all our policies. Our new database will simplify this exercise, facilitating access to better information, including the origin source of all ingredients and packaging.

### **Our next steps**

Our focus is to optimise the benefits of our new database. We will extend its reach to other areas of overhead spend beyond raw materials and packaging, then start to access information about the source of supply for specification documents. Whilst we do not believe that we have any areas of high risk within our supply chain, the Source Dogg tool will give us greater transparency to be able to enhance further our auditing and monitoring processes.

We will also continue to improve our vendor assessment process, working with our labour providers to enhance our understanding of their operations and assure the promotion of robust ethical practices.

This statement was approved by the Board on 30 January 2020.



Robert Higginson  
Chairman, Frank Roberts and Sons Limited  
30 January 2020



**Quality**



**Courage**



**Community**



**Nurturing**



**Togetherness**