

## **FRANK ROBERTS & SONS LIMITED** **MODERN SLAVERY ACT STATEMENT**

This is our sixth statement under The Modern Slavery Act 2015 and relates to our financial year, 1 September 2020 – 31 August 2021.

### **Our Business**

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.

The business has undergone significant changes as a result of the recent restructure, with the aim to align the separate business units to a single organisational structure. Core functions are now integrated under the group Frank Roberts and Sons, sharing best practice across the business.

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:

- 99% of our raw material vendors fully approved on our data management system “Source Dogg” and have just commenced the roll out to our overheads vendors. The system automates and streamlines our front-end source to contract process, initially for raw material suppliers. This requires vendors, 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.
- Carried out an annual review of our Human Rights Impact Assessment to benchmark our practice and identify any areas for improvement.

- Continued to raise awareness across the business by issuing Modern Slavery updates, using Stronger Together resources for induction and acknowledging Anti-Slavery Day on October 18<sup>th</sup>.
- 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.
- Promoted our Whistleblowing Policy, Ethical Trading Policy, Ethical Trading Statement and Modern Slavery Statement by uploading onto our employee app; and
- audited our Agency providers 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. They are responsible for such actions as mapping out and auditing our supply chain and products, assessing and managing risk, reporting on KPIs and making recommendations 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.

### **Our Next Steps**

Our focus is to optimise the benefits of our new database. As stated above, we have extended its reach to other areas of overhead spend beyond raw materials and packaging and will now start to progress their assessment and approval. 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 2nd December 2021.

Signed.....  
**Mark Cooper, Transformation Director**

08/12/21