



MODERN SLAVERY STATEMENT

1. Introduction

“Modern Slavery” is a term which covers slavery, servitude, forced labour and compulsory labour and human trafficking. It includes exercising ownership over a person; coercing or threatening someone to perform work they would not do voluntarily; and arranging or facilitating another person’s travel with a view to them being exploited (even where the person consents to the travel).

Carr’s Flour Mills Ltd. aims to ensure that there is no modern slavery within its business or supply chains. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.

This statement covers our financial year ending 31 March 2018.

2. Overview

Carr’s Flour Mills Ltd. is one of the UK’s largest flour millers operating from 3 main locations, namely Kirkcaldy, Silloth and Maldon. Carr’s Flour Mills Ltd. employs around 164 employees across the UK.

We produce bulk and bagged flours as well as bran products for our customers who vary from large industrial food manufacturers, retailers to small local bakers. Grain is sourced from approved suppliers which includes larger cooperative farmer owned grain stores and general merchants with some off-farm supplies.

The Board of Directors for Carr’s Flour Mills Ltd includes the Chairman, Managing Director and Finance Director. The Board reports to a Board of Directors for Whitworth Holdings Ltd. which is the umbrella company, also based in the UK.

We work closely with our main suppliers and customers; with our employees and their representatives (including Unite and USDAW, our recognised unions); and with other trade bodies such as NABIM, and comply with the SMETA Best Practice Guidance in order to ensure the highest level of compliance with food manufacturing standards and ethical trading initiatives.

3. Responsibilities

The Directors of Carr’s Flour Mills Ltd. Are responsible for overseeing our efforts to eliminate modern slavery and for monitoring progress against the KPI’s contained in this document. Progress is measured regularly and is on our rolling agenda for quarterly Board meetings.

The HR Department and our Line Managers are responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, with guidance from our outsourced HR Advisors, and that any agencies used are appropriately checked and commit to ethical standards.

Line Managers are responsible for upholding our “core values” and for ensuring that employees who work for them also behave in accordance with these.

Our Supply Team are responsible for ensuring that appropriate checks are made prior to any orders being placed with new suppliers, and our Sales Director and QA Department work with our major customers to provide them with appropriate information on our modern slavery and to gain suggestions and feedback.

4. Documentation

Since 2014 we have issued suppliers with our Ethical Trading Policy and required them to sign to confirm that they comply with this and let us know if they have any issues in doing so.

We comply with SEDEX Best Practice Guidance. This covers labour standards, health and safety, environment and business ethics.

5. Actions

Employees: all new employees are appointed directly and checks made of their right to work in the UK. We conform to the ethical trading standards. There is no forced, bonded or involuntary labour. Staff turnover is very low and all overtime is voluntary.

Agency workers: we only use agency workers sparingly, for temporary placements, and use the same supplier who has given us written confirmation that no agency worker is being exploited as part of any slavery or human trafficking. In order to ensure that there is no forced, bonded or child labour, Line Managers check during the induction of any agency worker that he/she is aged over 16, has not paid any recruitment fees in order to procure the work, has not been required to forfeit his/her passport and is free to leave the agency if he/she wishes.

Suppliers of raw materials: we embrace socially responsible trading and all suppliers are issued with our Ethical Trading Policy which they commit to and which sets out key minimum standards relating to employment and workers.

Major Suppliers: all are requested to inform us of the steps that they are taking to eliminate modern slavery.

Customers: we also work closely with our major customers to ensure that we comply with any employment practices and procedures specified in their audits.

6. Due Diligence, monitoring and auditing

All major wheat suppliers are issued with our Ethical Statement for Suppliers and are required to sign and return a commitment ensuring that their businesses and supply chains are free from modern slavery.

Our supplier contracts will be updated to include clear provisions that require our suppliers to commit to ensuring that there is no modern slavery, both within their own business and within their own supply chain (including anyone with whom they sub-contract). Suppliers will be required to self-certify their compliance with the Ethical Statement and contractual provisions will also include that we may undertake ad hoc site visits, audits and regular monitoring, or end the contract early, and without penalty to us, in the event of a breach.

7. Penalties for breach

If a supplier is found to be involved in any form of modern slavery, its contract will be terminated either immediately or on its due renewal date, depending on the severity of the breach.

Contractual penalties may be awarded against any supplier for a breach of contract, or incorrect self-auditing responses, questionnaires or the giving of incorrect information.

If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, he/she will be subject to the Company's disciplinary procedure.

8. Training

The Company will provide suitable training for employees to ensure that they are aware of this statement and can be vigilant in identifying and reporting any concerns they have.

Relevant employees and managers are informed of any updates to our HR policies via email. In addition, workers and managers have all been trained in the standards for Forced Labour, Child Labour, Discrimination, Harassment and Abuse as part of our Ethical Trading Policy. Refresher training will be carried out as and when deemed necessary.

9. Related policies

We have the following HR policies in place for employees:

- Core Value Statement
- Ethical Trading Policy
- Whistle Blowing Policy
- Grievance Procedure
- Equal Opportunity Policy
- Bullying and Harassment Policy

Copies are available in the Company Policies folders that are kept on the main network. All HR policies are updated on an annual basis and we consult with managers and union representatives prior to updating them. Employees are reminded of the policies from time to time and notified of any updates.

10. Key performance indicators for monitoring and review

- Sales and Purchasing Teams to receive refresher training.
- Revise core values and re-issue to employees.
- Record and monitor complaints raised through our grievance or whistleblowing procedures which relate to modern slavery.
- Record of suppliers who are terminated due to allegations of modern slavery.
- 100% of existing suppliers signed up to our Ethical Statement for Suppliers.

11. Declarations

Signed By:

Name: Duncan Monroe

Director: Managing Director

Date: 7/8/17

Approved by the Board on 24/8/17