

This statement is made pursuant to s.54(1) of the Modern Slavery Act 2015 and sets out the steps that Valeo Confectionery Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Valeo Confectionery Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

Valeo Confectionery Limited, operating from 6 sites across the UK (Pontefract, York, Cleckheaton, Liverpool, Blackburn and Blackpool), are an international supplier and the leading UK independent manufacturer of sugar confectionery.

Risk Assessment and Management

The following groups of workers have been identified as vulnerable to the risks of modern slavery and the Valeo Confectionery HR team have been trained to be alert for particular potential indicators of modern slavery, particularly when dealing with workers who fall into one of these categories:

- Migrant workers
- Minority groups
- Contract, agency and temporary workers

Valeo Confectionery will only use labour agencies who are registered with the Gangmaster Licence Authority (GLA), have key individuals trained to be aware of the risks and indicators of modern slavery and we undertake bi-annual audits on our labour agencies to ensure their compliance against the ETI code. All agency workers / contractors have access to our 'Speak Up' service.

Other high risk areas identified are raw materials sourced internationally via agents. Risks are controlled by ensuring that all agents evidence that their suppliers are compliant with the ETI requirements.

Our Policies and Procedures

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent way. These include:

- Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

- Ethical Trading and Social Responsibility Policy. The policy explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- Equality and Diversity Policy. To ensure the fair and equal treatment of all employees and potential employees in each stage of their employment, and clarify the procedure for raising any grievances relating to equal opportunities.
- We operate an independent 'Speak Up' service where any employee, agency worker or contractors can phone or contact via a website in complete confidence and raise any issues or concerns that they may have with the business. This service is widely communicated to all employees and agency workers across all our business.

Other Actions

- We use the Stronger Together communication posters to raise awareness of modern slavery.
- All our sites are independently audited against the standards required by the Ethical Trading Initiative (ETI) code of conduct.

Our Suppliers

Valeo Confectionery operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on suppliers before allowing them to become a preferred supplier. This due diligence includes a requirement that they are SEDEX registered and as such conform to all elements of the ETI (Ethical Trading Initiative) requirements. On site supplier audits are also carried out where deemed necessary.

Compliance with the above requires that in supplier organisations

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. They hold their own suppliers to account over compliance to ETI standards
4. (For UK based suppliers) They pay their employees at least the national minimum wage/ national living wage (as appropriate)
5. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
6. Are clear that we will terminate the contract at any time should any instances of modern slavery come to light

Training

Key people within Valeo Confectionery Limited have attended Stronger Together training to identify signs of modern slavery and human trafficking within our business.

All new employees to the business are provided with appropriate training on induction to the business to raise awareness of 'modern slavery'.

We are working through a programme to ensure all current employees have received appropriate training – and will receive refresher training on this subject every 3 years.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from -employees (via our whistleblowing policy, independent ‘Speak Up’ service or by way of formal grievance raised), independent audits, or the public or law enforcement agencies, to indicate that modern slavery practices have been identified.

Performance to Date

Since the start of monitoring in 2016, no reports have been received or issues raised concerning modern slavery.

Conclusion

During the period 1st April 2020 to 31st March 2021, Valeo Confectionery continues to work to increase awareness of risks and reporting channels. We will continue to develop our commitment to combat modern slavery and will review and update our policies, procedures and training as appropriate.

Approval for this statement

This statement was approved by the Board of Directors on 25th February 2020

Name Marieke Van Troys

Position: Chief Finance Officer

Date: 25/02/20