



UK

Part of ABP Food Group

FirstUp
from ABP UK



**ABP UK
Modern Slavery Statement
September 2017**



Stop Modern Slavery

INTRODUCTION

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by ABP UK during the year ending 31 March 2017 to prevent modern slavery and human trafficking in its business operations and supply chains.



1) About ABP UK



2) Our Policies in Practice



3) Finding Risk



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6) Training and Awareness



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1) About ABP UK

ABP has been providing quality meat to thousands of customers for over sixty years. From humble beginnings in the Republic of Ireland, the ABP Food Group has developed a reputation for quality, efficiency and innovation. These values run throughout the portfolio and have been essential in making sure that we are able to deliver exactly what our customers need.

ABP UK is a division of the ABP Food Group and for the last 35 years has grown to become one of the world's leading food production companies. ABP UK employs over 4,500 people and has 14 factories across Northern Ireland, Scotland, and England, and our UK support office is in Birmingham. In terms of our company structure, we have core divisional functions such as Finance, Technical, and People/ HR to support the Production Operation at each site. ABP UK has strong growth forecast across all major categories and markets.



We use suppliers for many things, from delivering milk to our office for tea and coffee to supplying our packaging and labels. The most significant area we use suppliers is to source protein ingredients and the labour to make our products.

We don't own the farms that rear our livestock or the lorries that dispatch our products but we work closely with all of our suppliers.

We procure livestock from thousands of farmers all over the UK and we sell our products to retail supermarkets, food service, manufacturing and other wholesale distribution markets around the world.

FARM TO FORK



2) Our Policies in Practice

The business operates a number of policies across its businesses to combat modern slavery which are regularly reviewed and approved by senior management.

- The policies are based on the following commitments
- UN Guiding Principles on Business and Human Rights
 - ETI Base Code
 - GLAA Licencing Standards
 - Retailer Codes of Practice

Internal policies are:

- ABP UK Modern Slavery Policy
- Ethical Trading Strategy
- Human Rights Policy
- Guidance for Farms policy
- Whistle Blowing Policy for confidential reporting by workers and independent investigation of concerns
- Young Workers Policy to prevent risks to young workers.
- Our Employee Handbook emphasises our values and outlines the rights and responsibilities for our employees.

In the Supply chain the following policies apply

- Supply Chain Sustainability code of practice, detailing the ethical and environmental standards expected of suppliers
- GLAA licencing standard detailing the licencing requirements.
- Customer codes of practice, where customers set ethical standards for supply chains.



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3) Finding Risk

Understand. Tackle. Prevent.

RISK

We do all that we can at ABP but we accept that the risk of Modern Slavery and Exploitation is high in the food processing industry and wider supply chain. We operate a continuous improvement mind-set when dealing with risk and we know that the main risks to us are:

- 1) The farms that supply livestock to our abattoirs;
- 2) As a food manufacturer we have a high reliance on temporary agency labour;
- 3) Any supplier, particularly beyond the first tier where we do not have direct oversight of processes and procedures.

MITIGATION

There are formal risk assessments used by our business and supply chains in the context of

- SEDEX ethical risk assessments at every one of our UK sites;
- SEDEX engagement with our non protein supply base;
- Supplier verification process;
- Labour Supply Management process;
- Worker interview process- we teach People Team colleagues and line Managers to 'SPOT THE SIGNS'.

The main area of risk internally is identified as the labour supply chain, both through a third party labour provider or direct recruitment.

The main supply chain risk in our UK supply chains is also temporary labour supply.

We have a limited international supply chain but we recognise that the risks include temporary labour supply, forced labour, child labour and trafficking labour across international borders are all potential risks, depending on the geography involved.



SPOT THE SIGNS.

Modern Slavery takes all forms. It's an issue that affects people of all ages, genders and races. Victims may show any number of the following signs:

- **DEPENDENCE**
They may depend solely on their employer or gangmaster; be without authentic ID, or travel exclusively with colleagues.
- **BEHAVIOUR**
They may suffer from a lack of social interaction, be distrustful of the authorities, or feel they're obliged to work without pay.
- **ACCOMMODATION**
They could be unaware of their address, unable to give out contact details, or live in substandard accommodation with colleagues.
- **FINANCES**
They may have limited or no access to their earnings, or be forced into applying for benefits, credit agreements and loans.
- **APPEARANCE**
They may have unexplained injuries that appear to be the result of assault, or have no choice but to wear the same clothes every day.



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4) Tackling Risk

ABP UK strives to be a leader in combatting and mitigating the risk of modern slavery and exploitation in its business operation and wider supply chain.

The first modern slavery statement highlighted our effort to embed an awareness of the issue across the business. It focussed on highlighting the resource and commitment dedicated to the issue.

This second statement is an opportunity for ABP UK to continue a successful first year and to capitalise on the investment directed at the issue and highlight the success that this approach is bringing to ABP UK.

ABP UK continues to collaborate with customers, suppliers and external partners to drive a leading approach on the issue.

We subscribe to the **MINIMUM** expected measures which include:

- Maintaining A/B membership of SEDEX and active participation in working groups, and all sites subject to SMETA auditing;
- Active member of the GLAA User Group;
- Developed a risk based Ethical Action Plan;
- Implemented extensive People systems at each site and internal ethical audits and worker interviews;
- Made available multi-lingual whistle blowing phone lines;
- Continued Stronger Together Business Partner

We also go a **STEP FURTHER** to include:

- A dedicated Modern Slavery Resource, our Modern Slavery Prevention Officer;
- Partnership with ex GLAA consultant used for all internal site and external supplier ethical audits;
- Implementation of a multi-lingual Employee Assistance Programme with additional help line options;
- Mandatory external attendance of all People / HR Team Colleagues on CIPD accredited Modern Slavery investigation course;
- Mandatory internal Training delivery by our appointed Modern Slavery partner, Hope for Justice;
- A People Dashboard to monitor key indicators of risk such as site turnover, temporary labour usages, working hours, workplace accidents, language proficiency and attendance at classes;
- In our supply chain transparency and baseline performance is currently assessed through SEDEX and internal supplier approval processes.



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4) Tackling Risk (continued)

For our **SUPPLY CHAIN**, we have taken the following actions:

- Working to connect with our whole non-livestock supply base via SEDEX and complete the risk assessment;
- Updated our standard terms and conditions to include ethical requirements;
- Collaborated in an industry collaborations for responses to specific geographical risks when identified (FNET)

5) Key Performance Measures

AIMS

- To embed ABP UK values and policy relating to tackling the threat of modern slavery and exploitation across entire business;
- To take a pro-active and visible approach in mitigating the threat, risk and harm of modern slavery and exploitation;
- To develop and implement a framework of risk assessment, compliance and accountability to identify development and best practice;
- To support the retention and wellbeing of employees through improving the working and social environment;
- Improved levels of engagement of the worker leading to improved productivity.

And in doing so implementing;

- An MS strategy with specific **KEY PERFORMANCE INDICATORS** to measure progress by for the next 12 months:
 - Risk based Modern Slavery Action plan for each location in the UK division;
 - 100% Awareness of the risk of Modern Slavery and Exploitation;
 - Worker Interview programme capturing all colleagues in regular cycles;
 - Reduction of turnover of direct and indirect employees;
 - Improvement of attraction and retention rates.



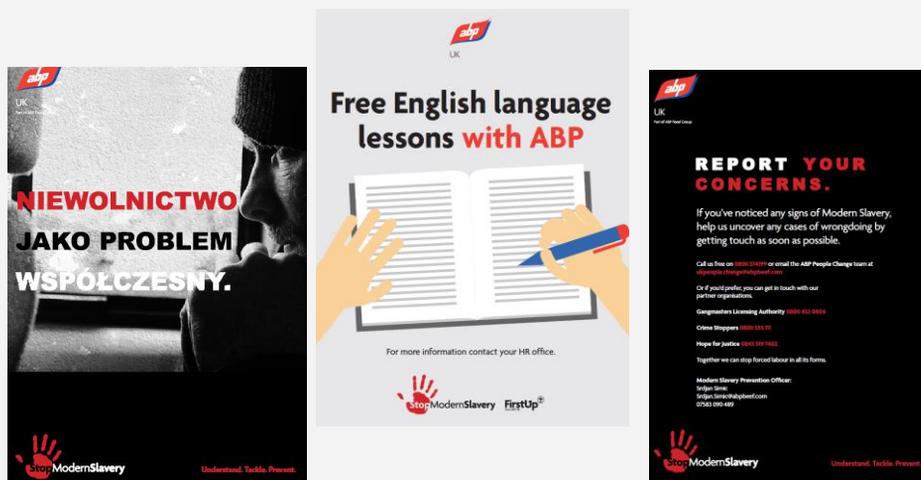
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6) Training & Awareness

Since the very beginning of this journey ABP has been committed to raising awareness of the issue of Modern Slavery via the following mediums:

- Modern Slavery Awareness training for all colleagues during induction to the company;
- Ethics & Modern Slavery Conference;
- Monthly Modern Slavery Newsletters;
- Multi-lingual Modern Slavery Awareness materials – Posters/Leaflets/ Business Cards;
- Introduction of Online Modern Slavery training;
- Training for suppliers.



7) Who we work with



- In order to maintain our approach as a leader in combatting this issue, we have developed and maintained a formal partnership with Hope For Justice. We collaborate to ensure that we have an end to end approach in relation to this issue;
- We also work with City Hearts who provide opportunity to victims of Modern Slavery or exploitation, with the appropriate training and support;
- We partner with a number of external consultants with extensive expertise in this area to maintain our focus on intelligence gathering and detection of any concerning practices and trends arising in our business or the wider supply chain. This includes former GLA enforcement and police officers;
- We collaborate with industry peers to build awareness and share best practice and assist other organisations to adopt good practices to mitigate the risk in the UK as a whole;
- We maintain an open dialogue with the GLAA and engage directly with the office of the Anti-Slavery Commissioner;
- We participate in various Human Rights Working Groups;
- We attend, participate and regularly present at Customer Supplier Exchange Networks;
- We partner with Labour Providers enrolled on our preferred supplier list to ensure they have processes and systems aligned with our own.



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Recognition

Awards

'Top New Talent' at The Grocer - Srdjan Simic, Modern Slavery Prevention Officer - 2016

Nominations

'Leadership in Anti-Slavery Practices' - Stop Slavery Awards 2016 , Thomson Reuters Foundation (1 of 10 shortlisted finalists)

'Pioneer in Ethical Trade' – CO-OP Ethical Trade Supplier Circle – TBA September 2017

'Employee Wellbeing- Modern Slavery Initiative' - IGD Awards 2017 – TBA October 2017 (shortlisted)

Guest Speaker Credits

- Global Modern Slavery & Supply Chain Summit – Vanessa Di Cuffa, People Change Director
- Co-op Supplier Forum – Srdjan Simic, Modern Slavery Prevention Officer

Other Industry Accolades

- Coaching & mentoring a FTSE 250 organisation on the ABP approach to Modern Slavery;
- Thomson Reuters Action Circle

“ We would like to thank you for your courage and willingness to be a part of the inaugural 2016 Stop Slavery Awards. We had no hesitation in selecting ABP as one of the 10 shortlisted companies recognized for leadership in anti-slavery practices.

We recognize that ABP invested significant time and effort to submit detailed responses and evidence of implementation and are very grateful for this.”

Monique Villa

CEO, Thomson Reuters Foundation
Stop Slavery Award



Srdjan Simic,
Modern Slavery
Prevention Officer



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8) Looking Ahead

ABP UK will continue to innovate, inspire and collaborate in this area to maintain a pivotal role in leading by example in such an emotive issue.

ABP UK has a continuous improvement mind-set in respect of their focus on Modern Slavery & Exploitation. We will never consider our work to be done in this area and always seek to innovate and measure our successes and perceived opportunities.

Modern Slavery

Key Performance Indicators

2017/18



**Sustained
Demonstrable
Campaign of Internal
Awareness including a
robust worker
interview process.**

**MS Training for all
Colleagues including
directly, indirectly and
contracted workers.**

**Supplier
Communication and
pre-supply
verification and
audit programme.**

**Reduction in the use
of Agency Labour &
labour turnover rates.**

**Comprehensive
Risk Assessments of
all sites and
compliance audits.**

**Strategic Partnerships
with organisations
with expertise in the
remediation and
support for victims of
slavery.**

OUR VALUES

Our core UK meat business has been built on strong principals. So regardless of who, what, where and why, at ABP UK all our people and all our food processes live up to our four strategic values - FirstUp, BestInClass, DoingMoreWithLess and OneVision.



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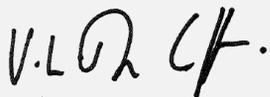


CONCLUSION

Despite what we do on this issue internally at ABP UK and with external partners, we know there is always more we can do to identify and prevent the threat of modern slavery and human trafficking across our business and wider supply chain.

We recognise that it is our own responsibility to be active and innovative in the implementation of new ways to defend against, and expose this highly sophisticated heinous crime which is at odds with the FirstUp value of treating people justly wherever they are in our business and supply chains.

This statement has been approved by the **ABP UK** Board of Directors.



Vanessa Di Cuffa
UK People Change Director
September 2017



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