

Wrights



2016–17

MODERN SLAVERY STATEMENT



Wrights Pies (Shelton) Limited Statement on Modern Slavery Act 2015

Wrights Pies (Shelton) Limited intends to work only with suppliers and manufacturers from a position of trust, teamwork, honesty and mutual respect. We expect all of our business partners to operate on the same principles. The following Code of Conduct outlines our minimum expectations in various areas, and we expect all businesses involved in the production of goods for Wrights Pies (Shelton) Limited to review and join in its implementation, working together to achieve continual improvements.

Child Labour

- There shall be no recruitment of child labour.
- Children who are younger than the minimum age permitted by the law of the country of manufacture, or who are younger than the age for completing compulsory education shall not be employed.
- Children and young persons under the age of 18 shall not be employed at night or in hazardous conditions.
- The factory must maintain documentation for every worker, verifying the worker's date of birth. Where official documents are not available, a factory must be seen to take all reasonable steps to verify age.
- Companies shall develop a policy to provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child.

Employment is Freely Chosen

- Suppliers shall uphold the human rights of all workers and treat them with dignity and respect.
- There shall be no forced, bonded or involuntary prison labour or any form of human slavery, servitude or human trafficking.
- 'Human trafficking' means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
- Wrights Pies (Shelton) Limited strictly prohibits any exploitative labour practices or any associated criminal conduct.
- Workers are not required to lodge "deposits" or their identity papers with their employer, and are free to leave their employer after reasonable notice.

Hours of Work

- Employees should not be required to work more than the maximum regular and overtime hours allowed by the law of the country of operation. No more than 48 hours per week are worked on a regular basis and no more than 12 hours per week overtime on a regular basis.
- Overtime must be voluntary and not used to replace regular contracted hours.
- Workers must be compensated at a premium rate according to national law.

- Holidays should be granted in accordance with local laws and employees shall be given, except in extraordinary business circumstances, at least one day off per week.

Wages and Benefits

- Wages and benefits paid for a standard working week must meet, as a minimum, national legal standards.
- Wrights Pies (Shelton) Limited will seek to work only with suppliers who ensure wages paid meet basic needs and provide some discretionary income.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Any deductions must be at a rate that is fair and reasonable by local standards and must be lawful and not discriminatory.
- Deductions from wages as a disciplinary measure shall not be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Freedom of Association

- Suppliers shall recognise and respect the right of workers to lawfully join associations of their choosing, and to bargain collectively.
- Wrights Pies (Shelton) Limited adopts an open attitude towards the activities of trade unions and their organisational activities.
- Workers' representatives are not to be discriminated against and will be given access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer will facilitate, and does not hinder, the development of parallel means for independent and free association and bargaining.

Discrimination

- Workers should be employed on the basis of their ability to do the job, rather on their personal characteristics or beliefs.
- No person shall be subject to discrimination in hiring, access to training, salary, discipline, promotion, termination or retirement, on the basis of religion or belief, gender, gender reassignment, race, nationality, marital status, age, pregnancy or maternity, caste, disability, sexual orientation, union membership or political affiliation.

No Harsh or Inhumane Treatment is Allowed

- Every employee shall be treated with respect and dignity.
- Workers shall not be subjected to any form of physical, sexual or mental harassment or verbal abuse.

Regular Employment is Provided

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationships shall not be avoided through the use of labour only contracting, sub-contracting, or home working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligation be avoided through the excessive use of fixed term contracts of employment.

Health and Safety

- Suppliers must provide a safe, clean and hygienic place of work and keep to all local laws relating to health, safety and welfare in the workplace. All reasonable steps must be taken to

prevent accident and injury at work. This requirement also applies to any accommodation provided for the workforce.

- The company observing the code shall assign responsibility for health and safety to a senior management representative.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Exits must be clearly marked, be accessible and must be unlocked while work is taking place. Fire prevention and evacuation procedures and alarms must exist and be tested regularly.
- First aid facilities must be available.
- Access to clean toilet facilities and to drinking water, and, if appropriate, sanitary facilities for food storage shall be provided.

Environmental Requirements

- Suppliers must manage all waste that they generate in accordance with applicable environmental laws and regulations and must continually work to reduce the percentage of waste going to landfill.
- Suppliers should be aware of their carbon footprint and commit to a strategy of carbon reduction.
- Suppliers should look to reduce the level of packaging used and improve the recyclable content of both their products and packaging.

Audits

- Inspections will take place as often as appropriate to assess compliance with this statement.
- Suppliers should promptly report to Wrights Pies (Shelton) Limited any known breach of this Code and take corrective action within a specified time period if concerns are found.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2017.

Wrights Pies (Shelton) Limited
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Approved by	Peter Wright
Position	Chairman & CEO
Date	23 - 12 - 2016

Wrights Pies (Shelton) Limited Anti-slavery and Human Trafficking Policy.

1. Policy Statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the Policy

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The compliance manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

3. Compliance with the Policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or Alison Harding as soon as possible.

- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Alison Harding.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the handbook.

4. Communication and Awareness of this Policy

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this Policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.