

# Modern Slavery Policy

## 1 Statement of Policy

- 1.1 Modern slavery 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.
- 1.2 Nobisco Limited (the Company) is committed to committed to improving all working practices to combat slavery and human trafficking ensuring accepting that such acts are a crime and a violation of fundamental human rights.
- 1.3 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015

## 2 Our Commitment

- 2.1 The Company commits to the following:
  - 2.1.1 that no modern slavery or human trafficking takes place within our supply chain or in any part of our business.
  - 2.1.2 In addition to a risk assessment and as part of our commitment to preventing modern slavery and human trafficking in our business, we continue to ensure our compliance with the Act by driving awareness of our company policy which outlines our requirements under the Modern Slavery Act;
  - 2.1.3 Where appropriate and according to the level of potential risk, introducing contractual provisions in supplier contracts that require suppliers to comply with applicable anti-slavery and anti-trafficking laws; and by maintaining a risk-based assessment of suppliers in order to identify any modern slavery or human trafficking related risks.
- 2.2 Furthermore, we will take steps to review and, where appropriate, to further improve our processes to ensure that we mitigate the risks in all our business activities and within our supply chains.

## 3 Our Suppliers

- 3.1 The Company has zero tolerance to slavery and human trafficking and expects all its supply chain to adhere to our company values and expectations
- 3.2 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

- 3.3 Where necessary the Company will carry out due diligence throughout the tender process in relation to the Modern Slavery Act.

## 4 Training

- 4.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, employees are made aware of this policy and how to report any concerns relating to employees or relating to our supply chain.
- 4.2 All employees receive copies of the company handbook and are made aware of other relevant policies that include:
- 4.2.1 Ethical Trading Policy
  - 4.2.2 Anti-Bribery Policy
  - 4.2.3 Safeguarding Policy

## 5 Reporting

- 5.1 All employees have a statutory obligation to report knowledge or suspicion of slavery or human trafficking either within the Company or within a supplier company. This must be reported immediately to a director of Nobisco Limited, without fear of personal victimisation should any suspicion or allegation found not to be true.
- 5.2 If in doubt employees may contact the UK Modern Slavery Helpline, at 0800 121 700 or via their website at <https://www.modernslaveryhelpline.org/>.

## 6 Spot the signs

- 6.1 There are some signs that may indicate concern, these include:
- Shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/ agitated or appear withdrawn and neglected. They may have untreated injuries
  - Rarely allowed to travel on their own, seem under the control or influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work
  - Have no identification documents, have few personal possessions and always wear the same clothes day in day out.
  - Are dropped off / collected for work on a regular basis either very early or late at night.
- 6.2 The above list is not exhaustive and anyone concerned seek advice from the above helpline.