



# Modern Slavery & Human Trafficking Statement

2020 – 2021

## Introduction

As a long established, independent and ethically responsible business, Morning Foods recognises the important role that we have in ensuring that our operations and products, and the supply chains that support these, operate to the highest ethical standards. One key element that relates to this is the role that we in the prevention and identification of modern slavery and human trafficking. This statement sets out our approach to understanding the risks associated with modern slavery and human trafficking in our own business and within our supporting supply chains, and details the actions that we are taking which seek to eradicate or minimise these risks.

## Organisational Structure & Supply Chains

Morning Foods Ltd operates in the food and animal feed manufacturing and supply industries, with its primary activities being cereal milling and the manufacture of cereal-based products.

Morning Foods has manufacturing / storage facilities across Great Britain. Morning Foods has both upstream and downstream global supply chains. As a business our key raw material is cereal grains; wherever possible these are sourced from the UK, and we always strive to support UK farming in this way. Ingredients and services are purchased both directly and through intermediaries; likewise, our products are sold both directly and through intermediaries. Products are supplied both for direct retail and business-to-business as components of other products.

We have taken steps to identify areas of our supply chain which are higher in risk; this has been an area of significant development over the reporting year.

## Organisational Policies

We have taken the opportunity during the Covid-19 pandemic (which covers the reporting year) of completely reviewing all of our Business Practice Policies, including those which cover modern slavery and human trafficking. These Policies incorporate the relevant requirements of the International Labour Organisation (ILO), the Ethical Trading Initiative (ETI) Base Code, and the UK Modern Slavery Act. Board level responsibilities for compliance have been set covering both our own direct operations and those of our supply chains.

As part of this review, we now require all raw material and packaging suppliers to either report through the SEDEX ethical trade system or to have an alternative independent certified ethical compliance system. All other suppliers, including contractors, are also being contacted for compliance with the ETI Base Code and the requirements of the Modern Slavery Act.

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## **Due Diligence**

We recognise that either direct or indirect employees operating in our own facilities are at potential risk of modern slavery / human trafficking.

As a business we have exceptionally low employee turnover and our employee base is very stable. As part of our review of our Business Practice Policies, we have completely refreshed our recruitment and induction systems in line with the protocols developed by Stronger Together & Responsible Recruitment Toolkit.

As part of this initiative, we have participated in advanced modern slavery training run by Stronger Together, and ongoing checks designed to identify signs of modern slavery have been enhanced.

When recruiting we follow guidance from the Responsible Recruitment Toolkit and specific questions are asked to identify modern slavery risks. Where we utilise agency labour, these labour providers are all licenced by the Gangmasters and Labour Abuse Authority (GLAA). Induction and checks on agency labour are always carried out by Morning Foods. To further strengthen our protocols relating to labour suppliers we are requiring them to have a certified Clearview audit.

We have a Whistleblowing / Concern Line in operation across the business; this is communicated to all employees and contractors. In addition to this we have an employee feedback system which covers all areas of the business. No areas of concern have been reported through either of these systems during the reporting period, and no areas of concern have been identified through our recruitment, induction or ongoing checks.

We have also introduced routine regular re-awareness training which covers all employees with either buying or selling responsibilities to ensure that our Business Policies are understood and are being complied with.

## **Assessing & Managing Risk**

In terms of our own direct operations, we primarily utilise the SEDEX system – this gives us oversight across all areas of our own business. This is supported, where relevant, by SEDEX Members Ethical Trade Audits (SMETA) audits of our own sites. To further support this we have commissioned additional supporting audits at our head-office facility as part of our Business Practice Policy review. This is an area that will be further developed over the coming year.

In terms of our supply chains, we require all raw material and packaging suppliers to either report through the SEDEX ethical trade system or to have an alternative independent certified ethical compliance system. All other suppliers, including contractors, are also being contacted for compliance with the ETI Base Code and the requirements of the Modern Slavery Act. Compliance with these requirements forms part of our Code of Business Principles and Supplier Guiding Principles – these form part of our standard conditions of purchase.

To further support our work on assessing and managing risks across our supply chains we have recently joined the Food Network for Ethical Trade (FNET). This is an area we will further develop.

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## **Training**

As part of our review of Business Practice Policies, and the subsequent review of our recruitment and induction systems, we are currently in the process of re-inducting all employees in the new system (as well as using this system for new employees). This includes training in an understanding of modern slavery / human trafficking and the requirements of the ETI Base Code.

Key employees have participated in advanced modern slavery training run by Stronger Together, and ongoing checks designed to identify signs of modern slavery have been enhanced. The process of supporting SMETA and other ethical audits has also been used as training tool for key employees.

We have introduced routine regular re-awareness training which covers all employees with either buying or selling responsibilities to ensure that our Business Policies are understood and are being complied with.

Training has also been completed on aspects of the FNET Risk Assessment Tool; this will increasingly be used to identify higher risk areas of our supply chains and the methods that may be used to mitigate these risks.

## **Goals / Performance Indicators**

We routinely monitor our own compliance with SEDEX requirements; this gives us oversight across the group. These are supported, where relevant, by SMETA or alternative ethical audits. No areas of significant concern have been identified, although as a result we have made a minor change to the wording of our contracts of employment. The results of these audits have also been utilised as part of our review of Business Practice Policies, recruitment and induction.

We review any concerns raised through either the Whistleblowing / Concern Line system or employee feedback system immediately, and additionally as part of our routine Management Reviews. Reviews are also carried out if any concerns are raised through any other medium. No areas of relevant / significant concern have been identified.

We monitor compliance with our supplier requirements as part of our routine reviews (which as a minimum occur annually). We intend to further develop our approach in these areas over the coming year, further utilising the SEDEX system and FNET where appropriate.

Over the coming year we will also complete the process of completely renewing the induction of our employees (which includes modern slavery aspects / ETI Base Code requirements). We also require our main agency labour provider to undertake a certified Clearview audit.

This statement has been approved by the board of directors. The statement will be reviewed and updated annually, and a link is provided on Morning Foods web-site home page. The statement will be published on the gov.uk modern slavery statement register.

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