

Oscar Mayer Modern Slavery Statement 2019/20

This statement has been published in accordance with the Modern Slavery Act 2015. This statement sets out actions taken by Oscar Mayer during the year ending 31st March 2019, to understand all potential modern slavery risks related to its business and to put in place steps, which are aimed at preventing modern slavery and human trafficking, in its business and supply chains.

Our Business and Supply Chains

Oscar Mayer is a market leading ready meal supplier to a majority of the major Supermarket brands. The business employs over 3000 employees. Our product supply chains are global and we aim to ensure all our products are responsibly sourced. Oscar Mayer undergoes regular independent and supplier audits at all of its sites. We also provide a confidential remediation route for all UK based workers, via both the 'Stronger Together' whistle blowing service and the Expolink Whistleblowing hotline. Oscar Mayer will undertake a risk assessment of key Tier One (T1) suppliers, in-line with the Ethical Trade Initiative Base Code and Sedex Guidelines.

Policies and contractual controls

We are committed to ensuring people are treated with dignity and respect and our approach is to implement the United Nations Guiding Principles on Business and Human Rights (Guiding Principles) and to recognise and manage the risk of harm associated with unsatisfactory working conditions, discrimination, modern slavery, human trafficking and forced or bonded labour.

Oscar Mayer operates the following policies that describe its approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operation:

- **Oscar Mayer Code of Practice** – The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. As part of the supply chain and labour provider process, all potential and existing key T1 suppliers will be assessed on their suitability as a supplier. Key T1 Suppliers will be expected to provide evidence of compliance with our Code of Practice, which requires them to:
 - Participate in ethical trading audits / assessments;
 - Provide employees with good working conditions, fair treatment and reasonable rates of pay; and
 - Respect workers' human rights and comply fully with all applicable laws.

The organisation also requires that:

- All work must be voluntary, and not done under any threat of penalties or sanctions
- Workers must not pay any deposits for work and employers or labour providers must not keep originals of identity documents.
- Involuntary labour is prohibited and workers must be free to leave work at any time with all outstanding monies to be paid to them.
- **Oscar Mayer Recruitment Policy** – The company will commit to reducing agency provided labour, where possible and offer the opportunity of permanent employment. Prior to commencement of employment, all employees will be expected to demonstrate a right to work in the UK. The Oscar Mayer Recruitment Policy is compliant with all UK legislation.
- **Responsible Use of Labour Providers Policy** – Oscar Mayer will only contract with labour providers which have an identifiable and legitimate business entity. Legal status shall be determined in accordance with national law and practice. Oscar Mayer will verify with its labour providers, the legal operating conditions for labour providers in that country and sector and

require confirmation that any system of licensing, certification or other regulation as required by national law and practice is properly complied with. The scope of this policy covers both:

- Recruitment Services – where the labour provider sources workers to be employed by Oscar Mayer, without the labour provider becoming party to the employment relationship that might arise therefrom;
- Employment Services – where the labour provider employs workers and supplies them to Oscar Mayer, assigns their tasks and supervises the execution of their tasks.
- Oscar Mayer will conduct appropriate due diligence checks to seek to ensure that the labour provider is compliant with this policy.

Due Diligence and audits of Suppliers and Supply Chain

Whilst Oscar Mayer will continue to undergo audits as prescribed by our Customers, we understand that our biggest exposure to Modern Slavery is in our supply chain. Risk assessments of our supply chain will be undertaken to assess ongoing ethical compliance. New key T1 Suppliers will also subject to due diligence and audits prior to approval.

Future audits will assess compliance with the ETI Base Code and Sedex, and will, amongst other aspects, be intended to identify any potential Modern Slavery practices. If any potential risk is detected, investigative and remedial action will be taken.

Recognising the limitations of relying on mainstream audits, Oscar Mayer will undertake a new collaborative approach with Labour Providers to build a transparent relationship to encourage regular communication and collaboration. This will provide a more pro-active approach aimed at looking at preventative measures rather than reactive measures and remedial action.

Modern Slavery Training

Oscar Mayer will look to provide all Managers and Supervisors with Modern Slavery training, as a module of Management Training. This training will cover:

- Transparency in Supply Chains
- How to assess the risk of Modern Slavery including recruitment and resourcing
- How to identify signs of slavery and human trafficking
- How to escalate issues where Modern Slavery is suspected
- What steps the organisation would take if suppliers, or contractors do not implement anti-slavery policies in high risk scenarios, including their removal from the organisations supply chain.
- Additionally, Oscar Mayer will continue to raise awareness amongst the workforce using Stronger Together and other relevant forms of communication.

Assessment of effectiveness in preventing Modern Slavery

Oscar Mayer understands that the risks of Modern Slavery will need ongoing assessment and action to mitigate risk. In order to measure the effectiveness of our Policies, we will continually carry out performance reviews, due diligence and report on investigations into Modern Slavery and any remedial action taken.

Oscar Mayer is fully committed to the prevention of Modern Slavery.

Signed.......... Francois Legrain, CEO

Date.....20.03.2019