



## **Preventing Hidden Labour Exploitation Policy: Premier Foods Modern Slavery Statement – November 2018**

We commit to developing and adopting a proactive approach to tackling hidden labour exploitation and modern slavery practices.

This includes exploitation of job applicants or workers by

- Any third-party individuals, gangs, agencies, labour providers or any rogue individual working within these businesses but without the knowledge of management.
- Any form of forced labour, human trafficking, payment for work-finding services or any other work-related exploitation such as forced use of accommodation.

It is understood that this practice is often well hidden by perpetrators, with victims (if they perceive of themselves as such), reluctant to come forward.

### **Coverage**

This policy statement applies to entities and sites owned and operated by Premier Foods and these are as follows:

#### **Manufacturing Locations**

- Carlton
- Worksop
- Stoke
- Moreton
- Ashford / Andover
- Lifton
- Charnwood
- Knighton

#### **Office Locations**

- St Albans
- Manchester
- Stoneham
- High Wycombe
- Rugby

### **Accountability**

This statement was approved by the Executive Leadership Team on 4th November 2018, with the Human Resources and Communications Director having overall accountability for the content and implementation of the policy.

### **Responsibility**

Responsibility for implementing this statement lies across several different roles and functions. Heads of HR and Human Resource Managers are responsible for the

implementation and development of this statement within their respective business units. The Recruitment Manager is responsible for ensuring that the recruitment team and all 3<sup>rd</sup> party labour providers are briefed on our expectations and the Procurement Team are responsible for ensuring that a modern slavery statement is included in all our supplier contracts.

### **Statement Commitments**

Premier Foods shall:

1. Designate appropriate managers to attend Modern Slavery related training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants.
3. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
4. Ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and the signs to look for. They will sign the appropriate Recruiter Compliance Principles (see Appendix 1).
5. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
6. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority (GLA) and police.
7. Provide information on tackling hidden labour exploitation to our workforce in a variety of formats such as workplace posters, worker leaflets and induction.
8. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
9. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities through ongoing dialogue with our employees.
10. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.



David Wilkinson  
**HR and Communications Director**

**Appendix 1:**



**Premier Foods 'Recruiter Compliance Principles'.**

The Recruiter Compliance Principles document is for use by Premier Foods' employees and our agency labour providers for each recruiting individual to sign. The signed document must be held in the recruiters personnel file.

**Recruiter Name** ..... **Location** .....

**All Recruiters must:**

- 1 Sign this document before interviewing any applicants.
- 2 Only interview applicants in an approved location.
- 3 Not allow applicants to complete registration documents on behalf of others.
- 4 Not accept money, favours or any gifts at all from applicants or workers.
- 5 Not loan any personal money to temporary workers.
- 6 Notify a manager when informed by an applicant or worker that they have paid money to be introduced to the Company.
- 7 Not allow an unauthorised agent or individual to introduce job applicants to the Company.
- 8 Notify a manager when suspecting an individual of introducing job applicants to the Company for personal gain.
- 9 Not act as landlords or be involved in the provision of accommodation, transport or other paid for services to workers.
- 10 Not allow anyone other than an authorised person to choose which workers are selected for work shifts.
- 11 Not force or coerce temporary workers to work against their will.
- 12 Not threaten or subject workers to physical or mental mistreatment.
- 13 Treat applicants and workers with dignity and respect.
- 14 Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a manager immediately.

**I confirm that I understand and will comply with the above principles.**

Recruiter's Signature: ..... Date: .....

**I have checked and confirm that the Recruiter understands the above principles.**

Manager's Signature: ..... Date: .....