2020 Modern Slavery Statement

This statement is made in accordance with the Modern Slavery Act 2015 and outlines the steps pladis UK & Ireland has taken, as well as its future plans, towards the prevention of forced labour and human trafficking within its organisation and supply chain.

pladis UK & Ireland is a trading name of United Biscuits (UK) Ltd.

Business Organisation and Structure

pladis was formed in 2016 and is the proud steward of more than 300 years of family baking and confectionery experience. As one of the world’s leading snacking companies, it is home to beloved brands including McVitie’s, Ulker, Jacobs and Carr’s. pladis is also proud to distribute a range of GODIVA chocolates exclusively for consumer-packaged goods channels around the world.

Within the pladis UK & Ireland business, there are over 4,000 employees across seven bakeries and one distribution site.

Our Processes and Policies

Code of Conduct

We operate according to the pladis Code of Conduct which captures the most important responsibilities expected of our colleagues as they go about their work. We expect our suppliers to adhere to the Code and we do not tolerate abuse of human rights in our operations throughout our business and particularly within our extensive supply chain.

Whistleblowing Policy

pladis operates a whistleblowing policy which encourages colleagues (including agency workers and contractors) to report any circumstances of potentially unethical conduct within our organisation. In 2020, the whistleblowing policy continued to be communicated to all our manufacturing sites and distribution centre on two occasions during the year.

Human Rights Policy

In 2020, pladis adopted a global human rights policy applicable to pladis’ employees, suppliers and subcontractors. This document sets out the fundamental principles and minimum standards, such as the requirement for humane and safe working conditions and non-discrimination or the prohibition of forced and child labour.

Information about this policy was shared with our UK&I Supply Chain colleagues during the second engagement on the whistleblowing policy.
No Deforestation Policy

In 2020, pladis also adopted a no deforestation, peatland development and no exploitation (NDPE) policy. It contains some human rights requirements and is applicable to all pladis palm oil suppliers.

Supplier Ethical Data Exchange (Sedex)

As part of doing business with pladis UK and Ireland, raw materials and packaging suppliers must become members of the ethical due diligence platform, Sedex, and complete the self-assessment questionnaire, which allows us to identify higher risk suppliers. In 2020, pladis UK&I started to use the new Sedex self-audit questionnaire as well as the risk assessment tool (RADAR) and had the tool's users trained to the new metrics available, in order to identify higher risk suppliers. In 2020, pladis UK&I also expanded the requirement for Sedex membership to key service providers (laundry, warehouses, hygiene contractors) and agents.

Audit Process of Subcontractors

At our manufacturing and distribution sites, we completed the ethical audit process of our temporary labour agencies as well as hygiene and security services. Unfortunately, due to the COVID impact, we were unable to include, as originally planned, some of our engineering services into the scope of those audits.

Social Dialogue

In 2020 more than ever, we continued to work closely with our trade union partners by providing updates on progress being made, during our quarterly consultation and communication forums.

Supply Chain Due Diligence

We see our suppliers as partners, and we recognise the importance of working closely with them to ensure that they act responsibly.

In 2020, we continued our responsible wheat sourcing programme with our flour suppliers and have maintained 41% traceability back to farm, up from 30% in 2017.

We also continued our responsible palm oil programme. In the UK, pladis has been a member of the Roundtable on Sustainable Palm Oil (RSPO) since 2008 and has been using 100% palm oil supporting the RSPO sustainability programme. pladis has also been, since 2018, a member of the Earthworm Foundation, a not-for-profit organisation, and has been working with the NGO to implement transformation programmes in palm oil production. In 2020, through this partnership, pladis collected information from its 19 global Tier-1 palm oil suppliers and was able to trace, for palm oil products entering pladis UK&I’s supply chain, 99.9% of its palm oil products (crude palm oil + kernels) back to mills. In 2020, pladis also adopted a no deforestation, peatland development and no exploitation (NDPE) policy for palm oil suppliers, along with a human rights policy applicable to all pladis UK&I’s suppliers. In pladis’ palm oil supply chain, Earthworm has checked compliance with pladis’ NDPE and human rights policies.
To do so, Earthworm has used intelligence from within their network in palm oil production and reviewed the available grievance systems. This exercise has resulted in raising several alerts, which are being investigated with our suppliers.

We also amended our pladis supplier terms and conditions, making it a requirement for suppliers to pladis UK&I to comply with pladis’ human rights policy (and, when applicable, NDPE policy).

In 2020, we started to include agents into the scope of our self-audit supplier questionnaire in order to capture human rights information for business approval. We assigned dedicated resources to cleanse and refresh our supplier databases in order to work more efficiently.

Finally, in July 2020, pladis UK&I became a charter member of Minority Supplier Development UK (MSDUK). MSDUK brings together innovative and high growth ethnic minority owned businesses with global corporations committed towards creating an inclusive and diverse supply chain.

**Capacity Building Through Human Rights training**

When we designed and launched our Modern Slavery Awareness Training for colleagues in 2017, we set ourselves the ambition of ensuring that one third of all our employees and managers in our factories would complete the training each year, on a rolling basis.

Despite the impact of COVID faced by our manufacturing sites, Modern Slavery training continued to remain a priority for our colleagues. At the end of 2020, 75% of our colleagues across the UK Supply Chain had completed this, in addition to 87% of our leadership and HR teams.

Furthermore, against a similar rolling target, 82.41% of our UK & Ireland colleagues had completed training designed to ensure a continued understanding of the pladis Code of Conduct.

In February 2020, we also commissioned a third-party to provide key representatives from our procurement and Safety, Quality, Security and Environment (SQSE) departments with a training on human rights. The objective of this session was to build more ethical and human rights expertise within the teams who have direct relationships with suppliers.

**Future Plans**

We will update our sustainability approach, including for human rights compliance with commodities at risk. We will continue our palm oil partnership with the Earthworm Foundation. In particular, Earthworm will continue to support pladis’ engagement with palm oil suppliers to investigate alerts. In addition, pladis will also explore the feasibility of expanding its partnership with Earthworm to additional commodities.

In 2021, we will continue to expand the utilization of Sedex tool and services to additional service providers and to have some members of pladis UK&I’s SQSE team trained to optimize the use of the Sedex self-audit questionnaire and risk assessment tool (RADAR), as it further
develops in 2021. We will work proactively with the highest risk scoring suppliers to gain verifiable improvements of their ethical performance and set objectives within the SQSE function to drive improvement in this area.

Following the launch of pladis’ human rights policy in 2020, the aim for 2021 is to implement an e-learning training module to best communicate the purpose of this policy to our colleagues across the UK&I Supply Chain.

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 and constitutes the pladis statement for the financial year commencing January 2020 and ending December 2020.

The Board of United Biscuits (UK) Ltd has reviewed and approved the statement and it has been signed on their behalf.

David Murray
Managing Director, pladis UK & Ireland