



## pladis Modern Slavery Statement 2021

### Statement Summary

This statement is made in accordance with the Modern Slavery Act 2015 - and any subsequent updates - 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.

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## **1. 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 McVities, Ülker, 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.

## **2. Our Processes and Policies**

### **2.1 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.

### **2.2 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 2021, the whistleblowing policy continued to be communicated to all our manufacturing sites and distribution centre on two occasions during the year.

### **2.3 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.

To enhance the communication and education of the Human Rights policy, training has been planned for 2022 for all colleagues across all pladis locations in the UK & Ireland to complete an e-learning module on the pladis learning platform.

### **2.4 No Deforestation Policy**

pladis continued to monitor supplier compliance to the no deforestation, peatland development and no exploitation (NDPE) policy which was launched in 2020. The policy is applicable to all pladis palm oil suppliers.

### **2.5 Supplier Ethical Data Exchange (SEDEX)**

pladis UK & Ireland are members of the ethical due diligence platform, SEDEX. In 2021, 5 of pladis' UK manufacturing sites had SMETA (SEDEX Members Ethical Trade Audits) audits despite the auditing challenges presented by the Covid-19 pandemic. Additionally, in the UK, pladis has



completed a full review of SEDEX self-assessment questionnaires for all manufacturing, office, and distribution sites.

In 2021, the annual internal ethical audit process was launched based on the principles of the SMETA audit and ETI (Ethical Trading Initiative).

As part of doing business with pladis UK & Ireland, the following stakeholders are required to become members of SEDEX: raw material suppliers, packaging suppliers, key service providers (laundry, warehouses, hygiene contractors) and agents. Additionally, these stakeholders must complete the SEDEX self-assessment questionnaire as a minimum. During our quarterly Ethical Steering Committee meetings, pladis use the SEDEX risk assessment tool (RADAR) to identify and review our Top 10 highest risk suppliers and proactively work with them to help mitigate their risk.

## **2.6 Audit Process of Subcontractors**

At pladis UK & Ireland's manufacturing and distribution sites, annual internal audits are conducted for temporary labour agencies as well as external Hygiene and Security providers.

All of our employment agents for UK manufacturing and distribution sites adhere and operate to all relevant UK Government legislation.

## **2.7 Social Dialogue**

In 2021, we continued to work closely with our trade union partners by providing updates on progress being made, during our quarterly consultation and communication forums.

## **3. Supply Chain Due Diligence**

We recognise the importance of working closely with our suppliers to ensure that they act responsibly.

Most of the wheat processed into the flour used for our UK biscuits is sourced in the UK. 41% is sourced through our 'back to farm' partnership.

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% oil palm supporting the RSPO sustainability programme.

pladis has also been, since 2018, a member of the Earthworm Foundation and has been working with this not-for-profit organisation to implement transformation programmes in palm oil production. Through this partnership, pladis collected information from its global tier-1 palm oil suppliers and was able to trace, for palm oil products entering pladis UK & Ireland's supply chain, 99.9% of its palm oil products (crude palm oil + kernels) back to mills. 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. In 2021 Earthworm produced a palm oil progress report tailored to pladis' palm oil supply chain, noting that our palm oil volumes have been investigated with satellite monitoring systems which confirmed progress towards becoming zero deforestation.

Additionally, in 2021 we reached out to suppliers of ingredients that contain minor amounts of palm oil to determine the sustainability of the palm contents. We will work closely with these suppliers to source segregated sustainable palm oil where possible.

pladis' supplier terms and conditions require suppliers to comply with pladis' human rights policy (and, when applicable, NDPE policy).

pladis UK & Ireland continue to be a chartered 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.

#### **4. 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 continued impact of COVID faced by our manufacturing sites in 2021, Modern Slavery training remained a priority for our colleagues. At the end of 2021, 79% of our colleagues across the UK supply chain had completed this, in addition to 82% of our leadership and HR teams. Furthermore, against a similar rolling target, 82% of our UK & Ireland colleagues had completed training designed to ensure a continued understanding of the pladis Code of Conduct.

#### **5. Future Plans**

In 2022, we will continue to monitor and maintain our supply base as well as a quarterly review of our highest risk suppliers using the RADAR tool and endeavour to help them reduce their risks. We aim to improve our relations with our suppliers and their journey using SEDEX as a tool to help their businesses become more ethically aligned. We will begin to identify suppliers that are ready to undertake an ethical audit and work with them towards being audited in 2023.

We will enhance our existing internal audit programme to include our distribution sites as well as updating the audit criteria against the latest SEDEX requirements. We will also update our external auditing programme to include our distribution sites, 3rd party oil logistics sites (in accordance with RSPO requirements) and indeed agency and contractor audits.

The Earthworm Foundation will work with us to conduct a second palm oil traceability exercise in 2022 building on the exercise conducted in 2020.



Due to continued COVID impacts in 2021, the rollout of Human Rights e-learning training will now commence in 2022, supported by refresher training on the Whistleblowing Policy, and campaigns at all pladis UK & Ireland locations to educate colleagues on the importance of Dignity at Work.

Continued work in 2021 will lead to further transition of products manufactured with cream fat switching from an RSPO mass-balance source to a segregated source meaning that all Retailer own-label products will contain 100% segregated palm oil and branded products will contain 90% segregated palm oil. We will also be investigating the purchase of sustainable soy lecithin. Sourcing sustainable ingredients is intrinsically linked to a supplier's ethical credentials.

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 2021 and ending December 2021.

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

A handwritten signature in black ink, reading "David Murray". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

David Murray  
Managing Director, pladis UK & Ireland