DIRECT TABLE
Foods

DIRECT TABLE FOODS LIMITED

MODERN SLAVERY STATEMENT

Introduction

Direct Table Foods Limited manufactures quality bacon and gammon products to the UK retail, food service and manufacturing markets.

We are committed to operating our business in an ethical manner, and to adopting working practices to ensure slavery and human trafficking does not take place anywhere in our supply chains.

We have zero tolerance to slavery and human trafficking. It has no place in our business or supply chain.

This statement relates to our financial period ending 31st December 2017 and it is designed to set out the steps we have taken during the financial year to ensure our business and supply chain is free from modern slavery.

Our Business

Direct Table Foods Ltd manufactures bacon products. This includes the smoking and curing, packing and distribution of bacon and related products to retailers, wholesalers and distribution companies.

We employ approximately 480 permanent staff and 110 temporary workers.

Modern Slavery

We are aware that one potential area of exposure for modern slavery is within our labour force, which includes a significant number of migrant workers.

We manage that risk in a number of ways…

- are members of SEDEX
- SMETA Audits – SEDEX members ethical trade audit
- FWC Fair working conditions approved January 2016
- Stronger Together Business Partners
- Associate Members of the Association of Labour Providers (ALP)
- Members of the Senior Management team are Gangmaster Licensing Authority (GLA) trained to Licensing Standards and the Prevention of Worker exploitation
- We use a reputable Temporary Labour Provider for the supply of temporary staff who are audited and accredited by RAC, GLA, Committed2Equality and Investors in People.
- Our temporary Labour Provider is audited 6 monthly by our Human Resources Manager a certificated IRCA Social Systems Trained Ethical Auditor.
- We give our employees employment contracts and access to our policies at the outset of their employment, which amongst other things cover Equal Opportunities, Harassment, Grievances and Whistleblowing.
- We pay all untrained direct labour, including temporary workers, a minimum of the National Living Wage. Wages are paid directly into their bank account, temporary labour pay statements are randomly checked throughout the year.
- We do not require staff to work more than 40 hours per week. Any overtime and opting out of the working time regulations is done on a voluntary basis.
- All staff are given holiday which complies with the statutory requirements and increases with length of service.
- We do not engage child labour.
- We encourage good communications with staff through an Information and Consultation Committee and display minutes from these meetings on staff notice boards.
- We display 'Stronger Together' and 'ETI Code' posters in the main employee rest areas and

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on notice boards which include the 'Stronger Together' and confidential customer helpline number and include modern slavery training in our induction process.

- Key members of the Human Resources team have attended Stronger Together training and employees including agency staff are regularly interviewed by employees trained to recognise red flag alerts and how to proceed with any follow up action required.
- We train staff on modern slavery and encourage them to report any concerns to HR, through either a 24 hour confidential protector phone line or directly to a member of the HR team.

Our Supply Chains

As an ethically responsible food manufacturer we aim to ensure that we are sourcing our raw materials and services responsibly.

All of products are manufactured from British or European Pork from our approved suppliers who meet our quality and food safety demands and are fully traceable to Farm and the appropriate UK or European Farm Assurance Standards for Animal Welfare.

We require our suppliers of Pork and Packaging to complete Due Diligence questionnaires as part of our supplier approval process and we will review our supplier relationships to identify further ways in which we may be able to help eliminate the risk of modern slavery within our supply chain.

Anti-Slavery Objectives for the forthcoming year 2018

1. We will continue our membership of SEDEX;
2. We will continue to be a Business Partner of Stronger Together;
3. We will review all of our HR policies in respect of our own workforce to ensure ongoing compliance with the ETI Base Code;
4. We will continue to train staff on the risks of modern slavery within our business and supply chains and ensure that they know what steps to take if they have concerns about modern slavery;
5. We will review our supplier Due Diligence questionnaires to ensure that they adequately address Modern Slavery;
6. We will consider changes to our contractual documentation with suppliers to include anti-slavery clauses;
7. We will monitor the effectiveness of our modern slavery policies through staff feedback and any reports or incidences arising during the year;
8. We will respond to any reports about modern slavery promptly and take remedial action where required.
9. We will randomly interview permanent and temporary staff for signs of slavery or human trafficking.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial period ending 31st December 2017. It has been approved by the Board.

Signed C.S. Date 4th April 2018

On behalf of the Board
Direct Table Foods Ltd.