

D B Food Group

Modern Slavery Statement 2018 to 2019

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that DB Food Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our businesses or supply chains.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. DB Food Group has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

DB Food Group operates in the food manufacturing industry. We supply and process meat, poultry, game and fitness related nutrition products from its premises located throughout the UK.

DB Food Group primarily sells UK and Irish based product, and imports product from EU area, plus a smaller element from traders throughout the world.

The following companies are within the DB Food Group:

- DB Foods Limited
- DB Foods (Holdings) Limited
- Tadmarton Products Limited
- Muscle Food Limited
- BBD Online Limited

This Group Modern Slavery Statement covers all of the above companies and relates to actions and activities during financial year April 2018 to March 2019 and the actions that we plan to take over the next 12 months.

Our high risk areas

Our key internal risk is the employment of staff where we recruit through reputable Agencies on a temporary basis. We ensure the agencies are meeting their obligations to paying the staff under our charge the appropriate rate.

We carry out a risk assessment to identify who we consider to be high risk suppliers and we ensure that these suppliers meet the requirements of the Modern Slavery Act by conducting our own audits and requiring declaration from the supplier on compliance.

Our policies and procedures

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Staff responsible for carrying out interviews sign an interviewer declaration about their responsibilities in identifying slavery at the recruitment stage.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how workers and employees are being treated, or practices within our business or supply chain, without fear of reprisals. This policy is actively promoted throughout the Company to increase awareness.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees, workers and suppliers to act.
5. Slavery posters in different languages are displayed in staff areas advising staff how to report slavery.
6. The HR and Payroll department have procedures in place to help identify signs of slavery.

Our suppliers

DB Food Group operates a supplier policy and maintains a preferred supplier list. We are continuing to conduct due diligence on new suppliers that are considered high risk before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and on site audits where appropriate which include a review of working conditions. Our anti-slavery policy and group modern slavery statement forms part of our contract with new suppliers as well as existing suppliers who are identified as high risk and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with new suppliers and relevant existing suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We train all relevant management teams to ensure they understand the signs of modern slavery and ensure they are trained in all associated slavery policies. The HR and Payroll department have also been trained in how to identify signs of slavery and how to follow internal policies and procedures related to slavery. Over the next 12 months we will organise training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

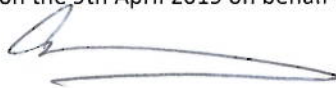
- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

For the previous financial year April 2017 to March 2018 there were no reports from employees, the public, or law enforcement agencies to indicate that modern slavery practices had been identified.

Approval for this statement

This statement was approved on the 9th April 2019 on behalf of the organisation's board of directors

Director's signature:



Name

Gary Smith – Group Finance Director