



Pecan Deluxe Candy (Europe) Limited Modern Slavery Act and Human Trafficking Statement

Introduction

This statement sets out Pecan Deluxe Candy (Europe) Limited (“Company”) actions to understanding all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement sets out our commitment to the Modern Slavery Act and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place within our supply chain or in any part of our business. The company takes a zero tolerance approach on modern slavery throughout the organisation.

Organisational Structure and activity

This statement covers all activities of the Company, which is part of the Pecan Deluxe Group, which is a growing international family-owned company.

The company is a food manufacturer producing both frozen and ambient products employing approx. 120 + at our factory in Sherburn-in-Elmet. Our priority is to deliver quality and value to its customers and firmly believes in working with all employees to achieve and deliver superior results with everyone taking individual accountability. Through its endeavours and relationships it also ensures that all suppliers apply the same standards.

Supply chain structure and activities

The company procures a range of raw materials, semi- finished goods, finished goods, packaging and services from hundreds of both UK and international suppliers to enable the company to produce a diverse and wide range of quality products. Our supply chain can be complex and has the potential to not only impact on the reputation of our company but also that of our customers who are some of the largest ice cream, bakery and dessert manufacturers world-wide. Each supplier goes through a selection and approval process via our supplier approval process to ensure they operate and supply their products and or services ethically and within the relevant legislation and laws.

The company aims where possible to procure products direct from the manufacturer which includes some of our key raw material ingredients such as flour, butter, sugar, egg, milk and chocolate.

Our company works to a number of accredited standards which includes BRC, Sedex, Fair-trade, RSPO, UTZ, KAT, Halal and Kosher standards. As part of our ongoing relationships with both our customers and these accreditation bodies this includes both announced and unannounced audits.

Responsibility and Due diligence

Overall responsibility for the Company’s anti-slavery and human trafficking initiatives lies with the Managing Director. The head of Human Resources is responsible for the statement creation and for ensuring that training of internal staff is carried out. The head of Operations is responsible for the formal approval process for the

incoming supply chain of raw materials, packaging and services along with the Technical specification controls of the supplier approval process.

Relevant Policies

The company operates the following policies that describe its approach to the identification of modern slavery and human trafficking risks and the steps to be taken to prevent slavery and human trafficking in its operations.

- **Employee code of conduct.** The company code of conduct and the ethical principles describes the standards which the company expects its employees to adhere to. The company strives to maintain the highest standards of employee conduct and ethical behaviour not only internally but also when operating abroad and managing its supply chain.
- **Supplier code of conduct.** The supplier code of conduct for suppliers has been derived from the company's ethical trading policy. It applies to all suppliers of the company. In addition suppliers must adhere to compliance and the law.
- **Recruitment / Agency Workers.** The company uses only specified, reputable and pre-approved employment agencies to recruit staff and verifies the practices of an agency it is using before accepting workers from that agency. Each approved agency works to the company's ETI base code which is based on the SEDEX accreditation. Audits are carried out that specifically look at the registration process of all new temporary labour, ensuring they are approved by the Gangmasters & Labour Abuse Authority ("GLAA") and that they have a current and valid licence.

Training & Induction

All employees are trained through the induction process on the company's ethical trading policy which includes the ETI base code.

Starting in 2018 the company will require all relevant departments to attend training on Modern Slavery.

In addition to training all employees, the company will raise awareness of Modern Slavery issues via connecting with the Stronger Together programme and sharing their communication campaign using posters, emails and briefings.

Approval

This statement covers financial year 1st October 2017 to 30th September 2018 and has been approved by our Managing Director.



Graham Kingston
Managing Director