



## Modern Slavery Statement 2018

### Introduction

Brakes is fully committed to ethical working practices, and, as a company, regards inhumane conditions such as slavery, worker exploitation, and human trafficking as completely unacceptable either within our own business or through our supply chains.

Given our global reach, we understand our responsibilities and have a zero-tolerance approach to modern slavery. We recognise that modern slavery, which can take many forms, is a crime, and we strive to act ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

Brakes has, for a number of years, had in place ethical trading standards to which each of our suppliers is required to adhere, as well as a set of Values which require us, among other things, to be the best we can be, and to always do the right thing. Our commitment to anti-slavery and human trafficking is further strengthened with the introduction of our Modern Slavery Policy which applies to all employees, officers, workers, contractors, suppliers and other business partners.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our Board fully supports the aims of the Act and is committed to combating the risk of slavery and human trafficking in our business.

### Organisation and Business Structure

Brakes is a leading specialist supplier of frozen, chilled and ambient food products, as well as catering supplies and equipment, to the foodservice industry. The principal trading company is Brake Bros Limited.

We employ around 7,000 employees, our business is organised into various business units as follows:

- Brakes UK;
- Brakes Ireland;
- Country Choice;
- Freshfayre;
- Pauleys;
- Woodward's; and
- Brakes Catering Equipment.

### Our Supply Chains

Whilst many of the products Brakes sells are sourced from the UK, we also source globally to support the range, quality, provenance, availability, and price requirements of our customers.

## **Prevention of slavery and human trafficking in Brakes**

### **Right to Work Checks**

All colleagues employed by Brakes who work on a temporary, fixed term or permanent basis are subject to a right to work check in accordance with UK legislation. A person is unable to commence work for Brakes unless they satisfy us that they are legally able to work within the UK.

### **Resourcing**

Where Brakes employs the services of an employment agency to source candidates for permanent or fixed term positions, we endeavour to only use agencies of good repute and who are listed on our preferred supplier list. Brakes requires the agencies to undertake the appropriate background checks on prospective colleagues, in conjunction with our own checks.

### **Agency Workers**

Where Brakes uses temporary workers supplied through an employment agency, we expect and require the agency to undertake the appropriate checks. We operate a preferred supplier list for these agencies and those listed are expected to undertake the appropriate background checks on prospective colleagues and to comply with our Ethical Trading Code of Conduct, which incorporates compliance with the Modern Slavery Act and other critical legislation.

If Brakes identifies that an employment agency is not adhering to our standards, the agency will be removed from the preferred supplier list and will not be engaged in any further recruitment activity on any basis.

### **Whistleblowing policy**

We have a whistle blowing policy in place which applies to all employees, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers or any other person associated with Brakes. Any colleague who has concerns about any aspect of the Brakes business is able to disclose their concerns in accordance with the whistle blowing policy. The whistle blowing policy is currently being reviewed and will be reissued to colleagues following such review.

## **Prevention of slavery and human trafficking in Brakes' supply chains**

Brakes has an ethical trading policy which is detailed in its 'Working with Us' document, and to which all suppliers of Brakes products must adhere. It is based on the standards set by the Ethical Trade Initiative (ETI) and reflects the key elements of the International Labour Organisation (ILO) conventions.

### **Supplier adherence to our values**

To ensure all those in our supply chain comply with our values we have in place a supply chain compliance programme.

Our risk framework, against which all new suppliers will be assessed and existing suppliers measured for compliance, determines the level of ethical risk at each stage of the supply chain. Effective escalation processes are in place to support decision making, should we become aware of non-compliance. Suppliers are required to undertake an independent ethical audit of their full supply chain should it be deemed necessary by risk assessment. The outcome of such an audit is used to determine



whether Brakes will work with a supplier. Brakes would address any failure by a supplier to meet Brakes' standards on a case by case basis, however, suppliers who fail to meet Brakes' standards may jeopardise their ability to continue to do business with Brakes.

A supplier's ethical performance will be monitored on an ongoing basis, at a frequency determined by the level of risk and vulnerability within their supply chain.

We will continue to review the effectiveness of these controls in reducing the risk of unethical practices.

Our Procurement, Technical, HR and Legal teams have the primary responsibility for ensuring supplier and contractor adherence to our values.

### **Due Diligence Processes**

As part of our ongoing strategy to identify and mitigate risk we have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### **Training**

Brakes' policies and standards are readily available to colleagues through the intranet and notice boards. To ensure a high level of understanding of the new legislation and the risks of modern slavery and human trafficking in our supply chains and our business, we will provide further training to our colleagues.

### **Reporting on our Progress**

With the introduction of the Modern Slavery Act 2015, we took the opportunity to review and update our Terms and Conditions of Purchase; Working with Us Document; and Ethical Trading Code of Conduct. We wrote to all of our suppliers to communicate the changes and to reiterate our commitment to a policy of delivering products that are sourced in an ethical and responsible manner and to ensure our suppliers were aware of our joint responsibilities and our requirement for them to adhere to the practices and controls we put in place to ensure the welfare of those employed within their supply chains. We have also reminded our suppliers that we require their cooperation with any inspections and / or investigations conducted by Brakes from time to time to allow us to verify compliance with our policies.

In the past twelve months, we have made progress in mapping our own business and key suppliers to identify those at a higher risk from Modern Slavery and we have developed a risk assessment by region and sector. Having completed this review, we are now looking to implement enhancements to our monitoring programme to support the verification of compliance.

Brakes has also since delivered refresher training to all managers in conducting right to work checks and we have improved our processes such that no new employee can be set-up on payroll without having first passed a right to work check.

Brakes has formed a working committee which comprises colleagues from our Procurement, Technical, Human Resources and Legal teams to review our Modern Slavery Statement and related policies and to consider what further improvements can be implemented by the business.

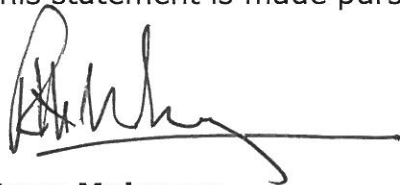
During the last 12 months we can confirm that there have been no reports of slavery or human trafficking within the Brakes supply chain.

### Further Steps

We recognise that more can always be done to tackle Modern Slavery and, as a business, we are committed to helping to increase awareness of the issues and a process of ongoing review of our practices and policies to combat the risk of slavery and human trafficking. We intend to take the following further steps to continue to combat slavery and human trafficking, going forwards:

- We will build on the ethical trading training previously provided to our supplier facing Procurement and Technical teams and we will roll out a programme of Modern slavery training to raise awareness of the issues.
- We will continue to review the effectiveness of our supply chain controls in reducing the risk of unethical practices.
- Brakes is currently a member of SEDEX which is a not for profit organisation dedicated to driving improvements in responsible and ethical business practices across global supply chains. It enables sharing of ethical supply chain data which allows members to access information about their suppliers in four key areas, including labour standards, health and safety, the environment and business ethics. We are exploring how this can be further developed to enhance the transparency of our suppliers' ethical performance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.



**Hugo Mahoney**  
**Chief Executive Officer – Brakes UK**