



Our statement on modern slavery

Introduction

The UK Modern Slavery Act 2015 (the 'Act') requires business to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. We are fully committed to playing our part in eradicating modern slavery and we firmly advocate for transparency and collaboration to eliminate the risks of modern slavery.

This statement refers to the financial year ending 30 September 2019. It sets out the steps taken by Noble Foods to prevent modern slavery and human trafficking in our own operations and supply chains

Entities that are within Noble Foods Group that are required to comply with the provision to produce a modern slavery statement are: Noble Foods Ltd, Noble Desserts Holdings Ltd, Noble Foods, Noble Logistics, Noble Green Energy and Noble Egg Innovations.

Our Business - Noble Foods Group

Noble Foods are the leading supplier of fresh eggs to UK retailers.

Many of Noble's eggs come from independent egg farms (we work with approximately 400 across the UK) in many cases with hens and feed also supplied by us. Company owned farms complement this egg production. Additionally we have 14 Company owned rearing farms and we rear around 4 million pullets per year. Our rearing farms provide birds for both Company owned laying farms and for sales to independent producers.

Our Milling Division is fully approved under the feed industry's Universal Feed Assurance Scheme (UFAS) and registered with the British Egg Industry Council Lion scheme. All mills are registered to manufacture medicated feeding stuffs, registered with the Local Authority under Feed Hygiene Regulations and are fully approved under a number of retailer schemes. We currently manufacture in excess of 750,000 tonnes of feed annually.

Our Poultry Processing Division is the largest spent hen and broiler breeder processing operation within the UK. Processing to the very highest welfare standards required by our customers and the RSPCA, the site is RAPCA Assured approved and currently accredited to the BRC AA standard.

In 2010 we acquired Gü which manufactures premium desserts for distribution in the UK and Europe.

In 2015 we acquired a renewable energy company, now named Noble Green Energy, this Company focuses on supporting farms reducing their energy costs by employing sustainable practices.

Our Commitment

Noble Foods is committed to preventing slavery, forced labour, harmful child labour and human trafficking in all its activities and require that our suppliers have the same commitment.

As a responsible company we always strive to do the right thing, we have had robust practices and policies in place for many years to help us meet this objective. We are committed to communicating openly and transparently with all stakeholders to ensure that our zero-tolerance stance is shared by everyone we work with.

Policies in relation to slavery and human trafficking

Noble Foods policies clearly state that we will not tolerate forced labour (including human trafficking) or child labour in our operations or operations related to supply to Noble Foods. We conduct internal and external audits to ensure compliance, we work collaboratively and proactively with the GLAA and operate the following policies that describe our approach to the identification of modern slavery risks, together with the steps to be taken to prevent slavery and human trafficking in our operations:

Noble Foods will not knowingly use any individual or organisation to source and supply goods or workers using practices of forced labour or human trafficking for labour exploitation. We will report any evidence or suspicion of cases of hidden third-party labour exploitation to the GLAA immediately. Failure by managers and leaders of the Company, third party labour providers or organisations in the supply chain to act upon concerns of worker maltreatment, coercion or harassment will be regarded as a gross misconduct offence or breach of contract and will be managed accordingly through the relevant disciplinary or contractual termination processes.

Whistleblowing Policy. Noble Foods actively encourages all its employees to report any concerns that raise suspicions related to human trafficking, both inside our organisation and through the supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Noble Foods whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. In 2017 Noble Foods introduced the Safe Call confidential and anonymous whistleblowing hotline. In the financial year 2018/19 4 calls were received through the line, all of which were thoroughly investigated and concluded, none of the calls related to modern slavery.

Recruitment Policy. Noble Foods will not use any individual or organisation to source and supply workers using practices of forced labour, human trafficking for labour exploitation, payment for work-finding services or any work-related exploitation such as forced use of accommodation. Noble Foods will confirm (through their own recruiting processes or through the recruiting processes of third party agencies) that workers are not subject to any of the above practices and will report any evidence or suspicion of cases of hidden third party labour exploitation to the GLAA immediately.

Agency workers. Noble Foods uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Regular audits of a random selection of agency workers, regular audits of each agency as well as audits of new agencies beginning to supply Noble Foods are part of the processes by which risks of slavery and human trafficking are addressed in relation to agency workers. All agencies used for temporary labour in the manufacturing of our products are licensed by the GLAA. We actively check these and audit them on a regular basis. Temporary workers are also interviewed to look for signs of any potential breaches.

2019 Case Study – Working together with the GLAA we supported workers to transfer from a labour provider whose audit started to fail to comply to a reputable UK agency with an exemplary record. The previous labour provider subsequently faced prosecution by the GLAA.

Business Integrity Policy. Noble Foods Business Integrity Policy clearly communicates to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour including when operating and managing its supply chain.

Risk Assessments and Audits

We expect our suppliers to operate to the same ethical standards that we employ ourselves. Noble Foods is an AB Member of Supplier Ethical Data Exchange (SEDEX) and we have been building SEDEX membership progressively across our group and supply base.

In 2019 we began the exercise to re-audit our own operations, processes and procedures in order to create our action plan for the future. This process has also helped us to identify where our processes need updating to reflect where we are today.

As an active supporter of 'Stronger Together', as part of our re-audit we have completed the Stronger Together Progress Monitoring Tool. This is a pioneering online self-assessment which supports companies to measure progress being made and to highlight their next steps in addressing modern slavery risks within their business and supply chains. We are committed to complete this each year to assess our improvement.

We have also completed the Stronger Together implementation checklist for 5 of the Noble sites, with a plan to complete the rest of the group in 2020. The implementation checklist has proven to be an extremely useful tool to identify and put in place localised action plans. These will improve awareness and ensure the implementation of best practise across the group.

Externally we audit our agency labour and service providers at least twice per year. In 2019 we have created a group tracker for all supplier ethical audits to provide greater transparency across the group.

Modern Slavery Risks in our Supply Chain

Noble Foods undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- broadly mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking;
- conducting supplier audits or assessments through Noble Foods own staff and third party auditors which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through own staff/ third party auditors and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular ("Stronger together", "Ethical trading" initiatives).
- Ensuring all suppliers are issued our Supplier Code of Conduct

Additionally, we play an active role in FNET (Food Network for Ethical Trade) which is a collaboration between suppliers and retailers. In 2019 we have begun to work more closely with specific workstreams in FNET, especially those in relation to worker representation and transport.

In 2019, as an additional measure, we issued a questionnaire to all our contract producers to update the modern slavery risk assessment for our core supplier base. This exercise has helped to prioritise our additional audit schedule and to highlight those with training requirements.

Relevant training

Noble Foods provides information on “Hidden Labour Exploitation” to our workforce through a variety of formats such as workplace posters, worker leaflets, staff presentations during the induction and training period and through internal auditing processes. The company also actively encourages workers to report cases of hidden third-party labour exploitation, provides the means to do so and investigates and acts upon reports appropriately.

The ‘Stronger Together- Understanding & Tackling Modern Slavery’ course content has been delivered to operational employees of Noble Foods and will continue to be provided to all new employees in order to educate the workforce and enable them to recognise and report the symptoms of slavery and human trafficking.

In 2019 Noble Foods continued to deliver Stronger Together training throughout the egg supply chain, providing training courses for out contract producers. A further 6 courses are planned through 2020.

KPI's

The organisation continually reviews its key performance indicators (KPIs) under the Modern Slavery Act 2015.

We:

- require all staff to receive Stronger Together training and will continue to train new staff;
- are continuing the programme to deliver Stronger Together training throughout our egg supply chain;
- continue to provide training and awareness for supply chain representatives;
- continue to conduct audits and ethical visits with suppliers;
- continue to develop a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain and continually reviews its existing supply chains, with the use of SEDEX, FNET and our audit program;
- continue to work together as an active member with the Food Network for Ethical Trade;
- will continue to articulate formally our expectations of high ethical standards, of those with whom we conduct business, including those businesses with which we have continuing supply relationships through the issuing of a Supplier Code of Conduct.
- commit to monitor our improvement through the use of the Stronger Together progress monitoring tool.

This statement will be reviewed and published annually

This statement was approved by the board of Noble Foods.



Dale Burnett
Chief Executive Officer
20th February 2020