



Modern Slavery Statement

Purpose

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. Sayers The Bakers Ltd are committed to the prevention of modern slavery and human trafficking in all its forms, and will not tolerate or condone the abuse of human rights within any part of its business or supply chains.

In accordance with Section 54(1) of the Modern Slavery Act 2015, this statement sets out our policies in relation to modern slavery and human trafficking and the steps taken in the financial year ending 30 September 2019 to address these risks in our business and our supply chains.

Business Background

The organisational structure of the business is a privately owned retail bakery business operating retail bakery shops in the UK, current shop numbers total 167. These shops are supplied directly or indirectly with a mix of products that are either manufactured in our own Bakery in Bolton or provided via external suppliers. Products are predominately supplied from within the EU & UK. These as well as the suppliers of services make up the supply chain of Sayers The Bakers Ltd.

The Company operates via its Sayers The Bakers, Sayers Café, Poundbakery and Poundcafe brands.

Workforce

All people working within our Company operated retail shops, Bakery, Distribution centre via our own fleet of vehicles, and Head Office, are employed directly by Sayers The Bakers Ltd. The Company employs circa 1600 employees directly. For some specific projects, the Company may use short-term contractors and consultants.

Our working practices include building communication and engagement with the trade union and the wider workforce.

In keeping with our values, we are supportive of each other, and committed to a working environment where everyone is treated with dignity and respect. Bullying and harassment, victimisation and discrimination are not acceptable and will not be tolerated. Employees are encouraged to report instances of harassment, discrimination, fraud or theft, issues relating to safety and security, human rights and policy violations, or any workplace concerns.

We recognise and engage with the Bakers, Food and Allied Workers Union (BAFW) who represent our employees within our Bakery. There is also a regular Health and Safety Committee that meets on site at the Bakery.

Within retail and the Offices, an employee consultation group meet on a regular basis to discuss any issues relating to employment, terms and conditions, health and safety etc.

Via employee engagement we ensure employees have channels which to express opinions and grievances, via the established Company Grievance procedure.

The Human Resource and Payroll Department are responsible for ensuring that all the standard necessary employment checks are conducted on all new starters to the Company, and such paperwork is subject to both internal and external audit checks to ensure compliance.

Supply Chain & Due Diligence

We recognise that the quality and safety of the final product depends, amongst other things, on the standard of raw materials. Consequently, we endeavour to purchase food and non-food raw materials, such as packaging from reputable suppliers only. Preferably with third party accreditation to the relevant BRC Global standard or equivalent at grade A or B, STS, or SALSA accreditation.

Our supply chain workforce is made up of a mixture of direct employees and those supplied via a third part, e.g. agencies.

Resulting from this integrated supply chain, we believe this is the area of our business that may represent a potential risk due to the following:

- Low skilled labour may be employed within food production and food processing.
- A proportion of this labour may comprise of migrant workers.
- A proportion of this workforce may comprise the use of agency workers.

Across our supply chain we only work with reputable organisations and we rely on them to undertake adequate checks to ensure that the labour they provide does not pose a risk of modern slavery.

In performing its obligations under our trade agreements, all suppliers shall ensure that each of its subcontractors shall comply with all applicable laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015, together with any anti-slavery and human trafficking policies of Sayers The Bakers Ltd.

The supplier represents and warrants that its responses to Sayers The Bakers Ltd due diligence questionnaire are complete and accurate and neither the supplier nor any of its officers, employees or other persons associated with it have been convicted of any offence involving slavery and human trafficking; and having made reasonable enquiries, to the best of its knowledge, has been or is the subject of any investigation, inquiry or regulatory body regarding any offence or alleged offence of, or in connection with, slavery and human trafficking.

The supplier shall implement due diligence procedures for its own suppliers, subcontractors and other participants in its supply chains, to ensure that there is no slavery or human trafficking in its supply chains.

The supplier shall notify Sayers The Bakers Ltd as soon as it becomes aware of any breach, or potential breach, of the anti-slavery and human trafficking policy; or any actual or suspected slavery or human trafficking in a supply chain which has a connection with the goods. Sayers The Bakers Ltd may terminate the contract with immediate effect by giving written notice to the supplier, if the supplier commits a breach of this condition.

Our Purchasing Manager and Head of Safety & Compliance are responsible for sourcing supply as well as ensuring that the performance of suppliers is of a satisfactory standard. It is a pre-requisite that any supplier used by the Company with an annual turnover over £36m provides a copy of their own Modern Slavery statement, and this is reviewed bi-annually.

The Company has made reasonable enquiries and so far as it is aware, neither the supplier nor any of its Directors, officers or employees have:

- a) been convicted of any offence involving slavery, forced labour or human trafficking whether in the United Kingdom or any other jurisdiction.
- b) been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery, forced labour and human trafficking, whether in the United Kingdom or any other jurisdiction.

As part of the Company's due diligence processes into slavery and human trafficking, the supplier approval process for new and existing suppliers includes a review of the controls undertaken by the supplier to ensure our strict policy on slavery or human trafficking is adhered to.

The Company visits its main two suppliers (that account for over 50% of our turnover) at least once a year, and performs paper based audits on all other suppliers within the supplier chain. This paper based exercise was performed 2 years ago, with no problems highlighted. A further audit will take place in October 2019.

Responsibilities

The Board of Sayers The Bakers Ltd recognises the importance of the provisions of the Modern Slavery Act 2015 and the Directors aim to ensure that slavery and human trafficking have no part in the Company's operations and supply chain.

The Company has always been vigilant about employee welfare and aims to be transparent in its practices. The Board welcomes the opportunity to state its firm commitment to a zero tolerance approach to modern slavery and human trafficking.

The Company Directors and Senior Management take the responsibility for implementing this policy statement and its objectives and shall provide the adequate resources or training it feels necessary to ensure that slavery and human trafficking is not taking place within the organisation or its supply chains.

We will continue to review how we manage these issues and continue to develop and implement effective programmes to address them. The policy statement is included on the Company website and is reviewed annually.

Reviewed and Signed on 1st October 2018.



David Silvester

Chief Operating Officer – Retail



Mark James

Chief Operating Officer - Commercial