
1. Purpose

- 1.1. The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.
- 1.2. The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.
- 1.3. No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in England.

2. Scope

- 2.1. *This Statement/Policy applies to C er lia UK Ltd (t/a BakeAway) (referred to in this document as 'the Organisation'). The information included in the statement refers to the financial year 2022/2023.*

3. Responsibility

- 3.1. C er lia UK Ltd (t/a BakeAway) is part of the C er lia group, several factories/offices are located in the EU e.g. Belgium, France, Holland (BakeAway reports into this office), Italy and further afield in Canada & the USA.
- 3.2. BakeAway is located in Corby, Northamptonshire in the UK. BakeAway's hierarchy is as follows:
 - 3.2.1. A Board of Directors are in charge of the C er lia Group.
 - 3.2.2. A Country Director oversees C er lia UK Ltd (t/a BakeAway) company.
 - 3.2.3. A General Manager is responsible for the BakeAway business.
 - 3.2.4. A Senior Management team each responsible for their respective departments aid the running of BakeAway.

4. Definitions:

- 4.1. The Organisation considers that modern slavery encompasses:
 - 4.1.1. human trafficking
 - 4.1.2. forced work, through mental or physical threat
 - 4.1.3. being owned or controlled by an employer through mental or physical abuse of the threat of abuse
 - 4.1.4. being dehumanised, treated as a commodity or being bought or sold as property
 - 4.1.5. being physically constrained or to have restriction placed on freedom of movement.

5. Procedure

5.1. Site Activity:

- 5.1.1. BakeAway's main activity is to make raw pastry/dough, by conducting the following activities: Mixing, laminating, sheeting, blocking & rolling of Puff, Shortcrust, Flavoured,

Pizza, Sweet & Savoury, Chilled & Frozen Raw Pastry, & Cookie Dough packed in flow or gas flushed wrap with or without cartons.

5.1.2. The above products are sold to the UK retailers with a small number of products being exported for overseas sales.

5.1.3. Our products do peak at Christmas time however are mostly steady volumes AYR.

5.1.4. The labour supplied to the Organisation in pursuance of its operation is carried out at Unit B1, Centrix Business Park, Furnace Way, Corby, Northamptonshire NN17 5BE.

5.2. Supply Chains:

5.2.1. In order to fulfil its activities, the main supply chains of the Organisation include those related to the manufacturer and sale of raw pastry, pizza & cookie doughs.

5.2.2. BakeAway sources the majority of our raw materials from UK based companies, however some ingredients are sourced from other parts of the world.

5.2.3. The largest volume ingredients (Flour & Fats) are supplied by UK based companies.

5.2.4. We understand that the Organisation's small ingredients are from first-tier suppliers are mostly intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

5.3. Potential Exposure:

5.3.1. The Organisation considers its main exposure to the risk of slavery and human trafficking to be foreign labour, a percentage of our workforce are agency workers, therefore this workforce can only be supplied by a GLAA (Gangmasters & Labour Abuse Authority) registered agency.

5.3.2. In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

5.4. Steps:

5.4.1. The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

5.4.2. The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

5.4.3. In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

5.4.3.1. The agency is audited by the HR Business Partner every 6 months.

5.4.3.2. Each employee receives a full induction, this includes information and "what to do" if the employee believes they are a victim of modern slavery.

5.4.3.3. All staff are trained on the Whistle Blowing Policy every 6 months.

5.4.3.4. A reporting system for concerns relating to Product Safety, Integrity, Quality & Legality & Modern Slavery has been set up and allows staff to anonymously report anything to the senior management team, they can fill in the form (located in the canteen), e-mail or call a senior manager.

5.5. Key performance indicators:

5.5.1. The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

5.5.2. Any reports received will be reviewed at the Senior Leadership meetings and annual management meeting, our KPI is set at 0 for the year.

6. Corrective Action:

6.1.1. Whistle blowing information fed back to BakeAway and acted upon by the senior management team, this KPI is also set at 0 for the year.

7. Slavery compliance officer:

7.1. The Organisation has a Slavery Compliance Officer (HR Business Partner), to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

7.2. This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed:



Print Name: Hayley Reddington

Job Title: HR Business Partner

Date: 16/10/2023

