

Modern Slavery Statement 2020

Westbridge Foods Group Ltd

This statement is being published in accordance with the Modern Slavery Act 2015.

It sets out the steps taken by Westbridge Foods Group Ltd during the year ending 31st December 2020 to prevent modern slavery and human trafficking in their business and supply chains.

This is the 1st Modern Slavery statement for the combined UK business that covers Westbridge Foods Ltd, CP Foods UK Ltd and all their subsidiaries.

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Westbridge Foods Ltd Global Supply Chain



INTRODUCTION

Westbridge Foods Group Ltd is a global business, supplying products to the leading retailers, manufacturers and the foodservice sector. We are an importer, manufacturer, and supplier of chilled and frozen food products to businesses in the UK and the EU with an export division supplying companies in Asia and Australia with products from the UK, EU and Asia.

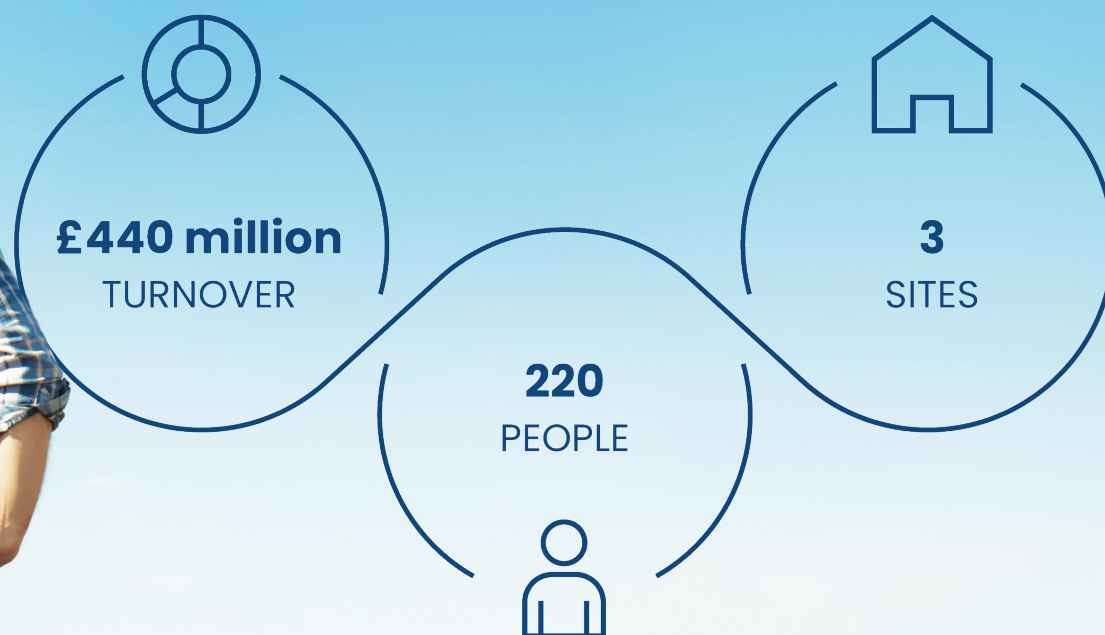
We continue our commitment to addressing modern slavery and human trafficking risks within our businesses and our supply chains.

Focussing on our suppliers in the Asean region we have continued to develop and broaden our knowledge of the risks to our business and facilitated further in-depth research into our supply chains going beyond tier 1.

Through our collaboration with industry groups, this has enabled us to continue to raise awareness of Modern Slavery through a common approach identifying, addressing, and managing the risks of Human Rights abuses of workers in our businesses and our global supply chains.

Our focus for the coming year is to align our Ethical strategy across the businesses ensuring a consistent approach to risk, monitoring and remediation.

With an **annual turnover of £440 Million** we **employ approximately 220 people**, both directly employed and agency workers, **based across 3 sites**: 2 administration offices in Worcestershire and a manufacturing facility in Suffolk. Our product range consists of cooked and raw poultry, seafood and ready to eat composite food products which are imported from Asia, South America, and the EU.



Westbridge Foods Group Ltd is a wholly owned subsidiary of Charoen Pokphand Foods Public Company Limited (“CPF”) one of the world’s leading listed agro-industrial and food conglomerates, which operates a completely vertically integrated business and employs more than 110,000 people globally. With net annual sales of 589,713 Million BHAT, CPF operates in both the livestock and aquaculture businesses and incorporates animal feed, animal breeding and farming, food manufacturing and processing, food retailing and restaurant businesses with operations in 17 countries and exporting to more than 40 countries across 5 continents.

Policy & Practice

As a business we will not tolerate the abuse of human rights within any part of our business, or our supply chains and we take any allegations that human rights have not been properly respected very seriously.

We actively recognise the importance of our participation in combatting modern slavery in our business and supply chains and have specific policies setting out our requirements for our suppliers and operations to adhere to.

Preventing Hidden Labour Exploitation Policy

Our global sourcing principles on modern slavery have been strengthened by adding this policy prohibiting the payment of direct or indirect illegal recruitment fees to secure a job. This policy outlines our commitment as a business to limit the risks of modern slavery.

Anti-Modern Slavery & Ethical Trade Policy

Based on the Ethical Trading Initiative (ETI) Base code which states that employment must be freely chosen, with no forced, bonded or involuntary labour. All suppliers and subcontractors who are not already bound by ETI requirements through ETI or SEDEX Membership are required to adhere to this policy.

Policies protecting own employees included in the company handbook:

- Recruitment and Selection Policy
- Grievance Policy and Procedure
- Whistleblowing Policy
- Equal Opportunities Policy
- Dignity at work Policy

The company whistleblowing line has been in operation for 4 years now aimed primarily for our workers in the UK to raise concerns for themselves and other colleagues. This will now be rolled out to all our employees in our global offices.

Business Ethics

- Gifts & Hospitality Policy
- Anti-bribery Policy

Future Developments

- Human Rights Policy
- Supplier Code of Conduct

We appreciate that this area is complex and as our global supply chains increase our efforts will be to ensure that our policies are adapted to include all new high risk and medium risk suppliers. We continue to work with procurement and buying teams to raise awareness of our policies to ensure that suppliers are fully compliant.

Our commitment is to ensure that our policies are available to all employees at all sites through the most appropriate communication platform and training is given to ensure awareness of the policies both internally and within our supply chains.

The policies above are available on request to carl.cooper@westbridgefoods.com

RISK ASSESSMENT

Our due diligence process involves an annual assessment of all our suppliers. To determine the risk profile of each supplier we use several tools to ensure that the highest risks and impacts to the business are identified and an appropriate due diligence is put in place.

STEP 1

Our first step is to assess the risk of a supplier based on a combination of country risk and annual spend.

To understand the country risk, we use the Food Network for Ethical Trade (FNET) risk assessment which combines published reports such as the Global Slavery Index, the US Trafficking in Persons (TIP) Report and the ITUC Global Rights Index to give an overall risk rating by country.

Using this information along with the annual spend we plot our suppliers onto the following risk rating scoring system which will assign them each an initial Red (high), Amber (Medium) or Green (low) "RAG" rating which determines where, as a business, we focus our attention.

STEP 2

Once our suppliers are given an initial RAG rating, a more in-depth assessment of those who are rated "Red" is carried out using the SEDEX Risk Assessment Tool to understand the industry specific inherent risks for the country of operation. This tool is populated by the industry leading Maplecroft system produced by Verisk who analyse Human Rights and Labour abuse risks globally.

FNET Country Risk	HIGH	(India, Bangladesh, China etc)	3	3	6	9	12
	MEDIUM	(UK, Australia, South Korea)	2	2	4	6	8
	LOW	(Germany, Norway, Sweden etc)	1	1	2	3	4
				1	2	3	4
				LOW	MEDIUM LOW	MEDIUM HIGH	HIGH
				0-9999	10000-99999	100000-999999	1000000
Annual Spend							

Using the SEDEX inherent risk rating combined with our initial rating our supplier's are further categorised with an overall RAG rating to determine where to concentrate our due diligence and help develop our plan for the following year.

RAG Rating requirements

Green	- Annual Review
Amber	- Review Supplier Case by Case
Red	- SEDEX, SMETA, 3rd Party Support, 1 to 1 support.

NEW SUPPLIERS

All new suppliers must undergo the risk assessment prior to commencement of supply.

Beyond Tier 1

Some supply chains beyond Tier 1 (e.g., Farms, Hatcheries, Feed Mills), which have been identified as high risk are externally audited against other 3rd party standards, which include the ethical treatment of staff including flags for modern slavery. For example, we source aquaculture products from supply chains certified to Best Agricultural Practice (BAP) and the Aquaculture Stewardship Council (ASC); we source poultry products from supply chains certified to Genesis GAP Standard¹.

In addition to 3rd party certification, we require all seafood suppliers to commit to participate in the Seafood Task Force (STF) programme and support its ability to operate in country where the STF has resource to administer the requirements.

¹ During 2020 our poultry supply chains have started to introduce the Lloyds Register Animal Welfare scheme which includes a Social Compliance Module

DUE DILIGENCE & ASSESSMENT OF SUPPLIERS & SUPPLY CHAINS

Having carried out a risk assessment on our supply chains, it is important this is followed by adequate due diligence to identify issues that may indicate modern slavery. We have extensive supply chains in high-risk countries of Thailand and Vietnam and our efforts have been focussed here.

Our high-risk Tier 1 suppliers have an ethical audit carried out by accredited third party auditors, based on risk this is done annually.

We recognise the importance of audits in providing a snapshot of working conditions in our supply chains but also understand the limitations they have in picking up hidden crimes such as Modern Slavery or Forced Labour.

Therefore, we continue to use audits with these recognised limitations by ensuring the audits are semi-announced; and that the audit data is reviewed alongside the output from worker interviews (which are carried out anonymously by random selection of site personnel) and working closely with NGO's to gather worker views which are performed off site and in the community setting away from the workplace.

Our anti-modern slavery and ethical trading policy requires suppliers to have an effective grievance mechanism in addition to a Whistleblowing or Labour hotline.

Where we believe risks might not be identified through these methods, we will undertake bespoke 3rd party impact assessments on specific risks getting to the heart of our high-risk supply chains.

In 2020, in collaboration with our strategic partners, we carried out a Human Rights Impact Assessment of our Vietnam Shrimp supply chain, the results were very encouraging and are due to be published in 2021.

We recognise that there will be risks and vulnerabilities in our supply chains and our efforts to identify, Act and Remedy will ensure we have sustainable ethical supply chains.

Through Audits, Assessments, Grievance Mechanisms and Whistle Blowing lines, any issues highlighted are reported in our KPI's. In severe cases there is a framework in place to remedy vulnerable or at-risk workers whether that be in the UK through local charities or GLAA, or in Asia through on the ground NGO's such as Labor Rights Promotions Network (LPN).



CASE STUDIES

Westbridge Foods continues to support the Seafood Task Force (STF) which aims to drive greater accountability and transparency to identify and eliminate human rights abuses and environmental degradation in the seafood supply chain.

During 2020 CPF and its subsidiary companies signed the Membership Agreement to uphold the standards expected of its members. As an active member in the organisation, we have supported the development of the Vessel Behaviour Monitoring Programme in Thailand, working with vessel, Department of Fishery and Ocean Mind, which this year saw progress in the development of tools to support labour indicators using the Vessel Monitoring. We will continue to support this work and build the learning into vessel remediation and capacity building.

Our supply chains in Vietnam have made good progress during the year supporting the Country Expansion objectives of the STF. To develop a single standard for shrimp supply in SE Asia regions, the STF has started consultations with Vietnam shrimp producers and their supply chains, to introduce the same level of transparency and accountability for social and human rights.

The CP Vietnam team are actively supporting this work in helping the STF pilot the tools and participate in further programmes during 2021.

Seafood Task Force

www.seafoodtaskforce.global/wp-content/uploads/2021/02/SFT-10-Point-Plan-2021.pdf

During the pilot, training of the STF and its objectives took place at each stage of the supply chain after the mapping process which is used to identify the actors in the total supply chain including vessels.

This work together with a deep dive into Social and Human Rights.



Assessment carried out independently through 2020 will help support the next stage of capacity building and remediation in our shrimp supply chains in Vietnam.



CASE STUDIES

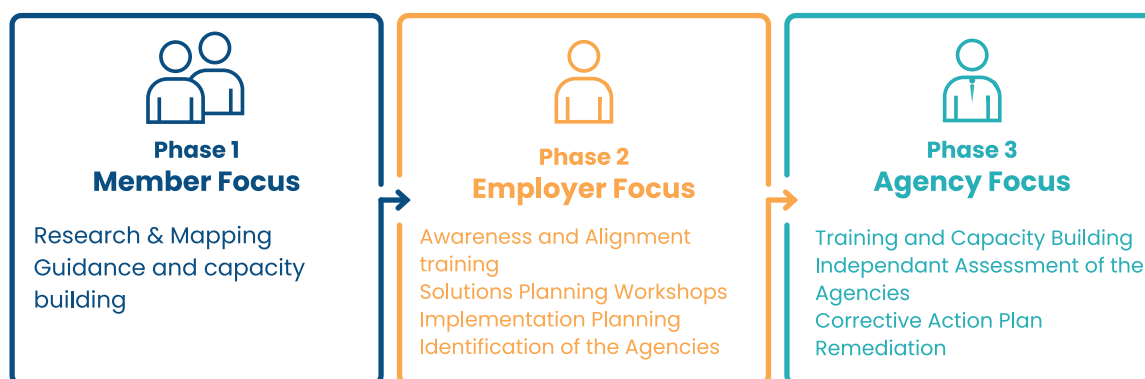
Responsible Recruitment

Thailand's economy has seen the country become a key destination for migrant workers in South East Asia particularly from Myanmar, Laos, and Cambodia to seek employment, with many employment opportunities across all manufacturing industries along the entire supply chain. These opportunities include our CPF supply chains in the poultry and seafood industries.

The majority of these workers are employed through recruitment agencies in the sending countries to perform low skilled work and with often complex and opaque labour supply chains, there is a high risk of migrant workers human rights being abused in particularly that of forced labour and debt bondage.

As members of the Seafood Task Force (STF) and working across the seafood industry, initially, a program was developed with three phases that aims to increase awareness of recruitment related issues, share standards and best practice, increase transparency and implementation of responsible recruitment practices.

In 2020, this programme was finalised across all CPF operations.



The first task was to understand and map the complex labour supply chain and identify the risks and costs that arise at each stage of the process in each of the different sending countries. The learnings from this enabled us to improve the recruitment process for workers, the employer and the agencies involved whilst operating within the bilateral Memorandum of Understanding (MOU) between the Thailand Government and its neighbouring countries.

Whilst mapping the process the decision was made to remove Thailand based recruitment agencies from our foreign labour recruitment programme.

The Responsible Recruitment Programme

The STF program was attended by 38 processors from Thailand across several CP Group subsidiaries including CPF and CPRAM. Phase 3 was implemented between August 2019 and August 2020 by 7 Recruitment Agencies nominated by the members. Working together acted as an enabler for change and secured active engagement in several agencies in both Myanmar and Cambodia. With the specialist advice of external Human Rights Expert operating at Group level advising on matters and further improvements in the program were identified and implemented which are then independently verified through 3rd party NGO lead worker interviews provided by Labour Protection Network (LPN)¹.

Insights leading to our Responsible Recruitment Program Improvements

- Agency Selection Criteria
- Labour Agency and Sun Agency Service Agreements
- Agency and Sub Agency Training
- Foreign Worker Recruitment Policy for Thailand
- Assessment Arrangements
- Guidelines to consider remedies for Foreign Workers
- Source country pre-departure Guidance Booklet
- Source country pre-departure training
- Worker Interviews post arrival to collect data on process

Measuring Impact



1/4 Agency Delisted



Worker interviews show the system working.



12 SMETA Audits completed – no recruitment fee



Evaluating the outcomes of the program is a key element in its robustness. Monitoring is carried out through worker interview carried out by independent 3rd party NGO and 3rd party SMETA audits which include a triangulation assessment through written, observation and verbal assessments.

Firstly, in terms of the Agency performance as a result of the 2nd party audits carried out, one agency was delisted from the Approval list. Three agencies which are equally split between Myanmar and Cambodia are approved.

Worker interviews post arrival carried out by LPN have reported that workers recruited using the approved agency have not been subject to additional fees or costs that were not approved during 2020.

There were 12 SMETA audits carried out during this period across 7 of CPF and CPRAM processing and slaughter plants throughout 2020 all of which reported compliance with the policy on Recruitment Fees.

Westbridge Foods & CPF will continue to support the implementation with further improvements planned with additional pre-departure training carried out by LPN in sending country this is delayed due to COVID-19 restrictions and CP moving towards all fees being paid directly to the agencies by CP rather than reimbursement to reduce risk further.

TRAINING, AWARENESS & CAPACITY BUILDING

Our employees and suppliers play an important role in helping us to ensure modern slavery abuses do not take place in our business or our supply chain. We educate our employees to ensure they can spot the signs of modern slavery and share with them the tools that are available for reporting such abuses.

Training

- All new employees at induction go through Modern Slavery awareness training which includes material and videos produced by Stronger2gether.
- All new “at risk” employees based at our manufacturing site have received awareness training.
- All current employees have received Modern Slavery Awareness training and how to report suspected abuses.
- Stronger2gether training on tackling Modern Slavery in UK Business and Global Supply Chains training undertaken by Responsible Sourcing Team.
- Responsible Sourcing Manager completed ETI Human Rights Due Diligence training in 2018 and completed Social Compliance Lead Auditor Qualification in January 2019.
- Regular participation in Human Rights, Modern Slavery and industry specific training by the Responsible Sourcing Team.

Awareness

- Regular participation in specific ethical conferences including SEDEX, Stronger2gether, Seafish Ethics Common Language Group and FNET by Responsible Sourcing Team.
- Poster campaign displayed across all sites in the UK raising awareness of how to spot the signs of potential victims.
- Whistleblowing posters across all sites.

Future Training & Awareness Raising

- Director, Executive Team, Procurement, Commercial and Buyer Training delivered by FNET – February 2021.
- All current employees to undertake refresher awareness training – June 2021.
- Overseas teams to be trained on whistleblowing hotline.
- Stronger2gether Training for site specific Modern Slavery Champions.
- Develop further communication channels for raising awareness.

Our Supply Chain

- We have rolled out 3rd party Labour Voices Hotline ran by the LPN in Thailand to all Tier 1 and Tier 2 CPF Owned Suppliers.
- Workers in CPF owned supply chains have been trained on their rights as employees.











KEY PERFORMANCE INDICATORS (KPI)

	2020	Plan for 2021
Staff Modern Slavery Training	-	100%
RED RAG Rated supplier SEDEX Membership	16/23 - 70%	23/23 - 100%
RED RAG Rated supply chain mapping	6/23 - 26%	12/23 - 52%
RED RAG Rated Suppliers with 3rd party grievance Mechanisms	2/23 - 8%	6/23 -26%
Human Rights Due Diligence Assessments	-	Carry out HRDD Risk Assessment



PARTNERSHIP & COLLABORATIONS

We understand that the issue of Modern Slavery is a global issue and that we will not be able to tackle it alone and that collaborations are fundamental to addressing and managing the risks.

	<p>The Food Network for Ethical Trade (FNET) was established in 2016 by several major UK food companies to improve human rights in global food supply chains through a common approach to managing ethical trade. We aim to support members to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and to build a forum for sharing issues and best practice.</p> <p>https://foodnetworkforethicaltrade.com</p>
	<p>The Seafood Task Force is a unique collaboration for the seafood industry tackling critical sustainability and ethical issues in the Thailand seafood industry sector. Building practical tools, resources and a network of like-minded organisations across the seafood supply chain, to help solve these critical issues together.</p> <p>https://www.seafoodtaskforce.global</p>
	<p>Social responsibility is paramount to Seafish and to the entire seafood industry. For us social responsibility encompasses concerns about labour and human rights issues. This includes human trafficking, labour abuses, child labour, debt bondage, forced labour, migrant workers, and slavery, across the whole supply chain.</p> <p>https://www.seafish.org/article/ethics-in-seafood</p>
	<p>Stronger Together is a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking, and other hidden third-party exploitation of workers. We provide guidance, training, resources and a network for employers, labour providers, workers, and their representatives to work together to reduce exploitation.</p> <p>https://www.stronger2gether.org</p>
	<p>Sedex is a global membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. Our collaborative approach helps buyers and suppliers to share and exchange data, helping to better manage social and environmental risks within their supply chain, and positively impact responsible sourcing.</p> <p>https://www.sedexglobal.com</p>
	<p>Impactt is an award-winning ethical trade consultancy with a vision to improve workers' livelihoods in a way that benefits businesses and workers. We specialise in improving labour conditions and raising productivity in global supply chains in a way that benefits brands, sites and workers alike. We "bridge the gap" between diverse stakeholders to develop robust, long-term, holistic solutions. And we offer rapid, pragmatic support in the event of a crisis.</p> <p>https://impacttlimited.com</p>
	<p>The Labour Protection Network* was formed to improve the lives of migrant labourers in Thailand by addressing the injustice brought on by discrimination and inequality. Only LPN has the courage to orchestrate life-saving rescues in the near term and the strategic focus to inoculate communities against human rights abuse in the long term.</p> <p>https://www.lpnfoundation.org</p>
	<p>Established in 2004 at the instigation of the UK government, ALP is a specialist trade association promoting responsible recruitment and good practice for organisations that supply the workforce to the food processing, agricultural and wider consumer goods supply chain. The ALP influences government and regulatory policy and provides a range of very useful information and services to its members. The ALP's mission is for "UK labour provision to be recognised as a model of global good practice" achieved through six policy focus areas:</p> <p>https://labourproviders.org.uk/</p>

LOOKING AHEAD 2021

As detailed in this statement, we have sought to adopt a thorough and robust approach to tackle modern slavery in our business and our supply chains.

Priority



Plans to improve training and capacity building in our business and supply chains will continue as well as investing in industry collaborations which will enable and facilitate further improvements and impact. This is a dynamic area for many businesses, and we continue to work with external stakeholders to ensure we reflect this changing environment in our planning.

The Company will continue to enhance our policies and practices to protect workers including encouraging further implementation of worker voice mechanisms throughout more of our supply chains. This will aid protection of worker rights and develop identification and remediation protocols.

This statement has been approved by the Board of Directors of Westbridge Foods Group Ltd and will be reviewed annually.

Nick Shaw,
Managing Director,
Westbridge Foods Group Ltd - May 2021



GET IN TOUCH

Westbridge Food Group
Polonia House
Enigma Commercial Centre
Sandys Road
Malvern
WR14 1JJ

Tel +44 (0) 1684 581800

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