



Modern Slavery Statement 2021

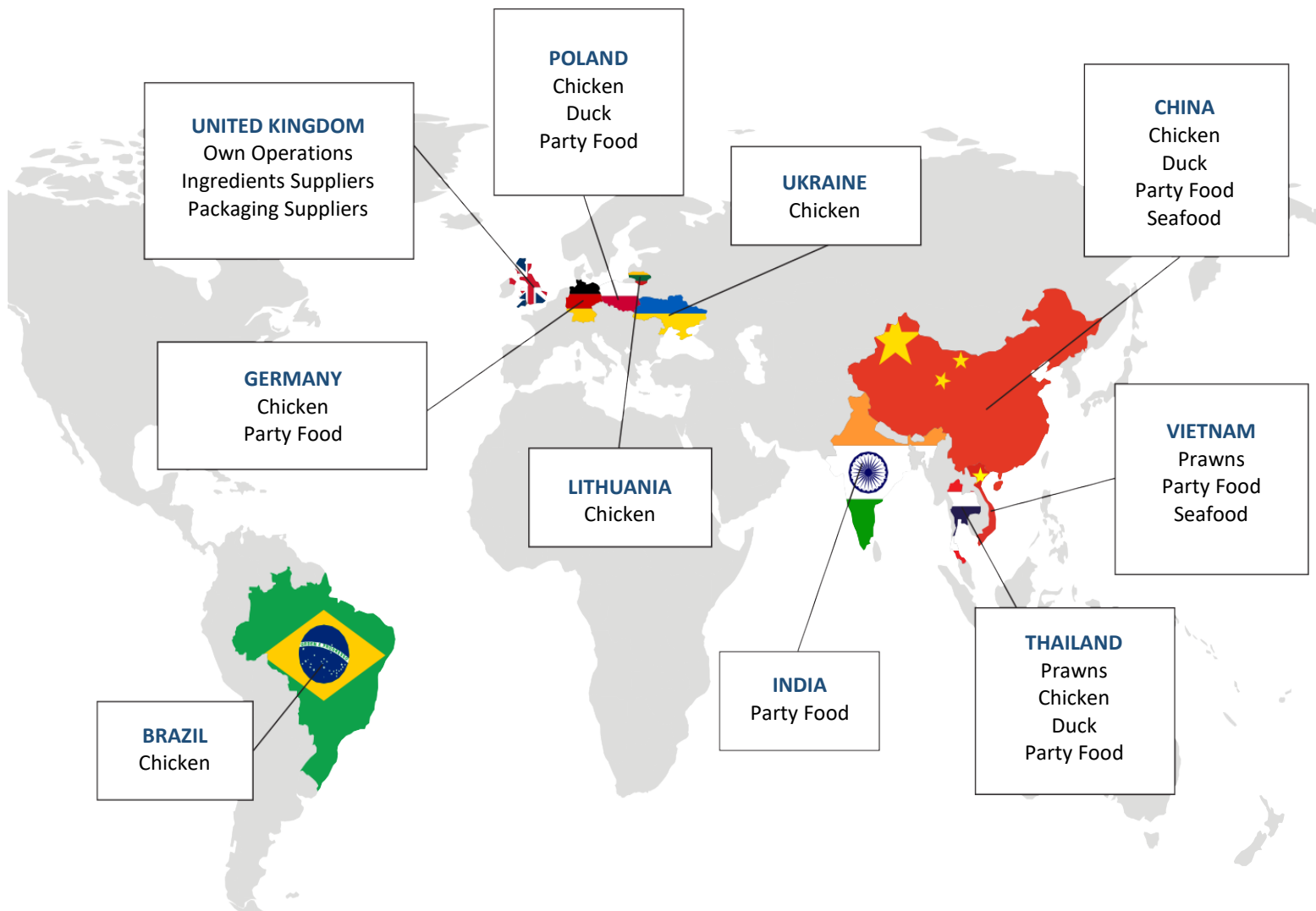
This statement is being published in accordance with the Modern Slavery Act 2015.

It sets out the steps taken by Westbridge Food Group Ltd during the year ending 31st December 2021 to prevent modern slavery and human trafficking in their business and supply chains.

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Westbridge Food Group Ltd Global Supply Chain



INTRODUCTION

At Westbridge Food Group, we are fully committed to playing our part in addressing and eradicating modern slavery and human trafficking risks within our businesses and our supply chains.

2021 was a challenging year for all businesses with the ongoing impact of COVID-19 being felt and bringing new challenges and risks to our business and our global supply chains. Lockdowns and travel restrictions limited our ability to conduct on site physical assessments within our supply chains and often we had to find new ways to continue our due diligence with the use of virtual assessments, virtual training, and virtual capacity building. These new challenges further highlighted the importance of transparency and collaboration within our supply base and the necessity of obtaining good accurate data from our supply chains to mitigate the risks of modern slavery and human trafficking.

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 BUSINESS & SUPPLY CHAINS

Westbridge Food Group 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.

With an annual turnover of £470 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 512,704 million Thai Baht, 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 OUR EMPLOYEES:

- 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 5 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

IN DEVELOPMENT

- Human Rights Policy, including Human Rights Due Diligence Assessment
- Supplier Code of Conduct

We appreciate that this area is complex and as our global supply chains increase, our continuous efforts will ensure that our policies are adapted to include all new high risk and medium risk suppliers. We remain working closely with our 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 platforms 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 Tier 1 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.



FNET Country Risk	HIGH	(India, Bangladesh, China etc)	3	3	6	9	12
	MEDIUM	(UK, Australia, Poland)	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			

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 “RADAR” to understand the industry specific inherent risks for the country of operation.

Using the SEDEX inherent risk rating combined with our initial rating our suppliers 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, 1 to 1 Support, 3rd Party Support

NEW SUPPLIERS

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

DUE DILIGENCE

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, and this is where our efforts have been focussed.

We require all our Tier 1, Red rated (high risk) suppliers to be SEDEX members and complete the SEDEX SAQ at least annually, and to have a Semi-announced SMETA audit either bi-annually or annually as a minimum.



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, as we continue to use these audits, we strengthen their function by ensuring the audit data is reviewed alongside the output from worker interviews (carried out anonymously by a random selection of site personnel). Working closely with NGO's they are able to offer additional worker interviews 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 see rising risks or new risks evolving in a particular market or industry, or if we believe certain risks might not be identified through audit, we would consider working with a third-party independent company to carry out further in-depth human rights due diligence review of that supply chain.

Where our upstream supply chains (e.g., Farms, Hatcheries, Feed Mills), have been identified as high-risk, we encourage additional third-party accreditation from reputable global certification scheme which cover the ethical treatment of staff and risks of 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 the majority of our poultry products from supply chains certified to Lloyds Register Farm F1rst Welfare scheme which has a social compliance module.

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).



Gangmasters &
Labour Abuse Authority



DUE DILIGENCE – CASE STUDIES



VIETNAMESE SHRIMP SUPPLY CHAIN HUMAN RIGHTS IMPACT ASSESSMENT

Westbridge Food Group, in collaboration with key supply chain stakeholders, commissioned an independent Human Rights Impact Assessment (HRIA) of our Vietnamese Shrimp Supply Chain to identify and assess the human rights impacts our business activities were having on workers in the Vietnamese shrimp industry.

The assessment covered the supply chain from finished product at the retailer back to processor, farm, hatchery, feed mill and fish meal processor. The assessment also covered recruitment processes, terms of employment and working conditions against 164 indicators reflecting benchmarks set by international human rights organisations through document review, interviews with site management and a total of 157 worker interviews.

The findings were mostly positive including all wages being above legal minimums, regular and not excessive working hours, and secure livelihoods for over 2,500 workers employed across the supply chain. The negative impacts identified were classified as minor with the recommendations being from the limitations of the assessment itself or the lack of documented policies and procedures which allowed for (though no evidence of) potential breaches in workers' rights.

Following the publication of the final report an action plan was produced to address the recommendations and we have continued to support the outcomes and work with our supply chain to implement changes to better mitigate any risks of any human rights breaches.

[A copy of the assessment report is available upon request](#)

SEAFOOD TASK FORCE



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 2021, Our supply chains in Vietnam have made good progress during the year supporting the Country Expansion objectives of the STF with the aim of developing a single standard for shrimp supply in the Southeast Asia regions.

Our supply chains have supported pilot schemes throughout 2021 sharing current practices and trialling the STF tools to help build a benchmark and highlight any gaps in the verification process. 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 will continue in 2022 with more physical assessment and projects being undertaken by the team.

Seafood Task Force

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

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

- Director, Executive Team, Procurement, Commercial and Buyer Training delivered by FNET
- 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.
- 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 RAISING

- How to spot the signs of modern slavery included in all new employee inductions
- Poster campaign, refreshed annually, displayed across all sites in the UK on how to spot the signs of potential victims.
- Whistleblowing posters across all sites.
- Regular participation in specific ethical conferences including SEDEX, Stronger2gether, Seafish Ethics Common Language Group and FNET by Responsible Sourcing Team.

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.

FUTURE TRAINING & AWARENESS RAISING

- All current employees to undertake refresher awareness training annually
- Our own international teams to be trained on whistleblowing hotline.
- Stronger2gether Training for site specific Modern Slavery Champions.
- Roll out companywide intranet with a dedicated Modern Slavery page
- Quarterly Modern Slavery awareness e-newsletter to all employees.










KEY PERFORMANCE INDICATORS (KPI)

To demonstrate our progress in addressing modern slavery risks, we use key performance indicators (KPIs) to measure our performance and to set progress goals for our next statement.

Measures	Progress
100% of own UK based employees undertake Modern Slavery awareness	100%
100% UK based Labour Agencies assessed annually	100%
100% high risk suppliers visible on SEDEX	100%
100% high risk suppliers receive social compliance audit (annually, where required)	83%
Carry out Human Rights Due Diligence of key strategic supply chains	1
Number of calls to whistleblowing line	0
Number of Modern Slavery Incidents Reported	0
Number of Modern Slavery Incidents Investigated	0

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 partnerships & 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.</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>
	<p>The Responsible Recruitment Toolkit (RRT) is a not-for-profit, global programme whose mission is to drive ethical and professional recruitment and labour supply that's good workers, recruiters, and clients. They offer an unparalleled toolkit to help businesses achieve and be recognised for responsible recruitment.</p> <p>https://responsiblerecruitmenttoolkit.org/</p>
	<p>Whistleblowing hotline solutions for organizations of all sizes</p> <p>NAVEX's whistleblowing hotline services provide employees, customers, and suppliers with a safe place to speak up about workplace concerns. Whether for simple or complex organization structures, our reporting system provides the ethics and compliance data you need to inform your program, helping you to spot trends and take corrective action before minor issues become critical.</p> <p>https://www.navex.com/en-us/products/navex-ethics-compliance/hotline-reporting-and-intake/</p>

LOOKING AHEAD 2022

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.

As the world emerges from the pandemic and we understand the full impact of Brexit on labour availability in the UK; we need to ensure that we continue to develop and evolve the training and capacity building in our business and supply chains, 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.

Appreciating that the challenges of 2021 are expected to continue into 2022, our intention is to start the physical audit programmes of our suppliers when safe to do so with a plan to carry out more in-depth human rights impact assessments of our high-risk supply chains where we have less visibility.

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

A handwritten signature in black ink, appearing to read 'Nick Shaw', with a stylized flourish above the name.

Nick Shaw, Managing Director,
Westbridge Food Group Ltd – July 2022



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