



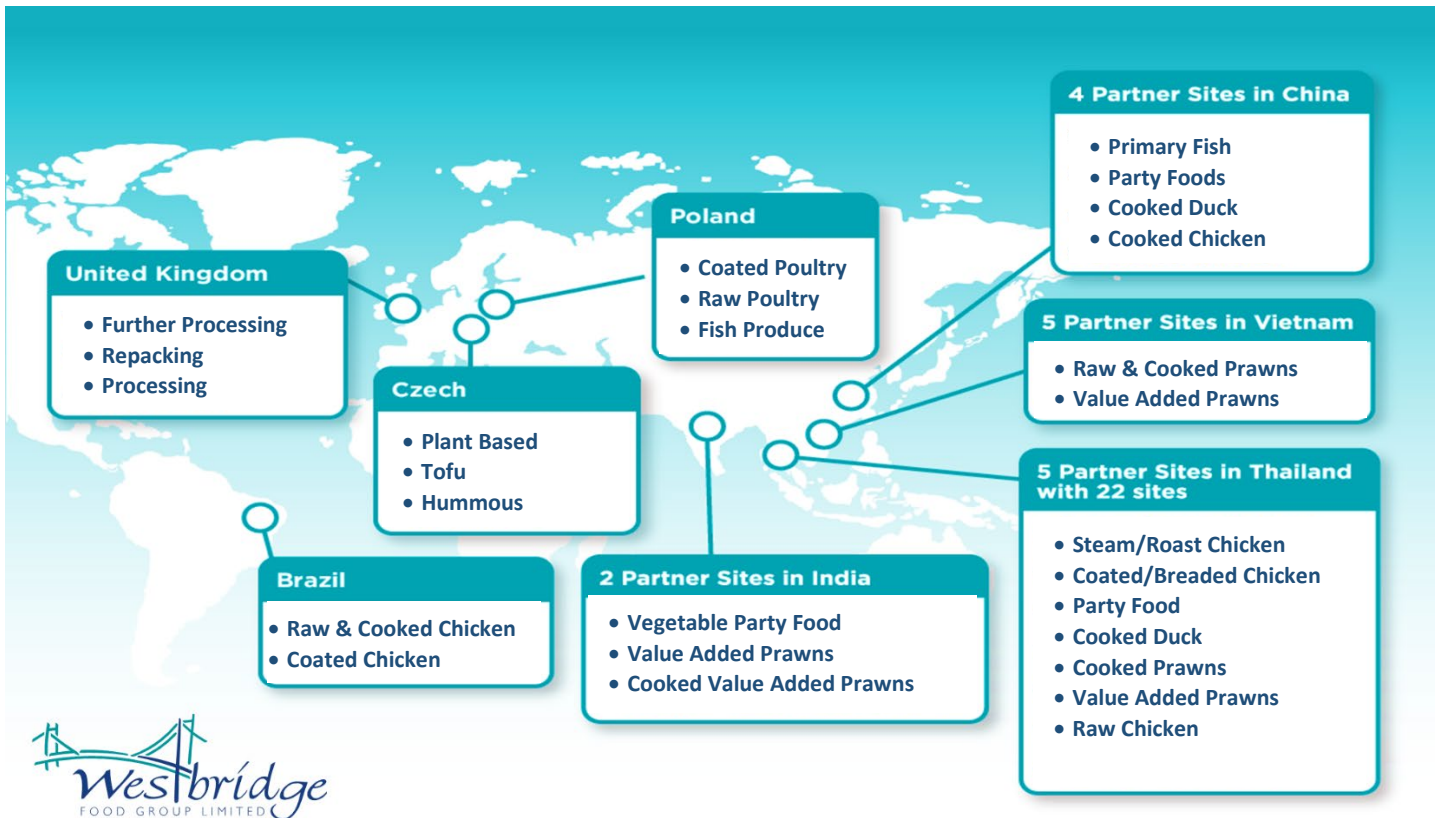
Modern Slavery Statement 2022



This statement is being published in accordance with the Modern Slavery Act 2015.
Financial year ending 31/12/2022

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INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps that Westbridge Food Group Ltd and its subsidiaries and CP Foods UK Ltd have taken during the year ending 31 December 2022, and continue to take, to prevent modern slavery and human trafficking in its business and supply chain.

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 £550 Million we employ approximately 240 people, both directly employed and agency workers, based across 2 sites: 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 130,000 people globally. With net annual sales of 614,197 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, 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

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 work 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 are reviewed annually to ensure that they remain relevant to affectively highlight and address the challenges we face.

All our policies are available on request to ESG@westbridgefoods.com

OWN OPERATIONS

Our employees play an important role in helping us to ensure modern slavery abuses do not take place in our business or our supply chain. We inform and train our employees to ensure they can spot the signs of modern day slavery and share with them the tools available and actively encourage them to report such abuses.

We have an extensive awareness training programme across our sites, tailored to the relevant roles within our business, from induction to annual refresher training we also have an ongoing awareness campaign and in-person activities throughout the year to keep our programme at the forefront of our employees minds.

During 2022, we introduced Modern Slavery Champions across our business to enhance our awareness programme and to ensure that all workers have access to support and guidance across all sites, in addition to the champions we rolled out a companywide intranet site which includes access to latest news, awareness videos and reporting tools.

TRAINING, AWARENESS & CAPACITY BUILDING

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.
- Factory Managers and Supervisors undertook specific awareness training carried out by an external expert into how to spot the signs and support potential victims.
- All new employees, including agency workers, go through Modern Slavery awareness training which includes material and videos produced by Stronger2gether during their initial induction
- 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.
- 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.
- Quarterly Modern Slavery awareness e-newsletter to all 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.
- Increase the number of Modern Slavery Champions

OUR SUPPLY CHAINS

As an importer, manufacturer, and supplier of chilled and frozen food products to businesses in the UK and the EU our supply chains are global covering Asia, South America and Europe. We understand that the main risk within our business is in our supply chains.

We undertake an ongoing risk assessment to identify the high-risk areas of the supply chain and apply varying levels of due diligence.

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

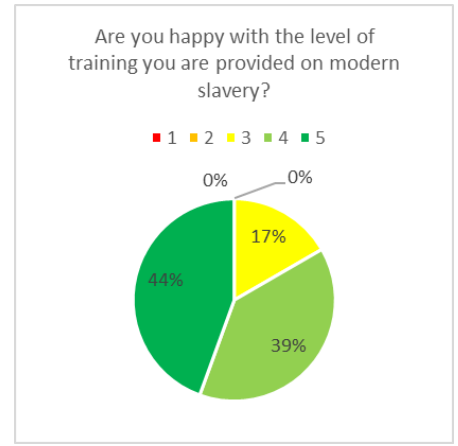
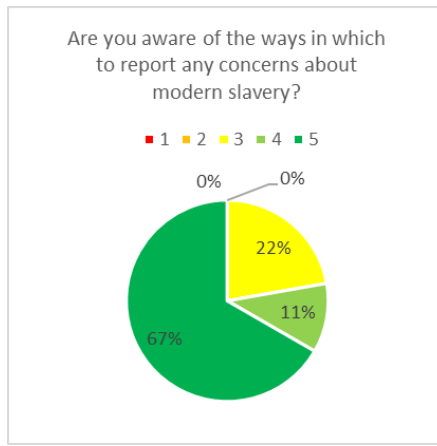
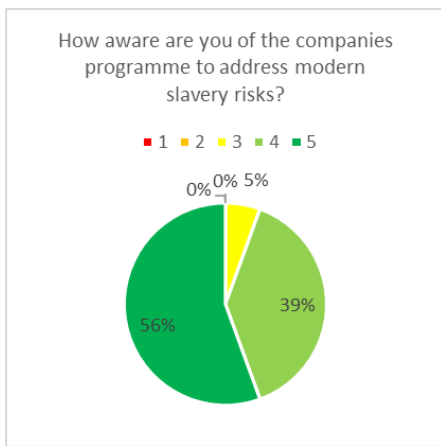


KEY PERFORMANCE INDICATORS (KPI)

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)	100%
Number of calls to whistleblowing line	0
Number of Modern Slavery Incidents Reported	0
Number of Modern Slavery Incidents Investigated	0











To assess how our programme is received by our employees we have carried out a survey across the business to assess what we are doing right and where we can improve and the findings were favourable but showed we still have work to do in certain areas: -



Scoring was 1 – 5 with 5 being the highest.

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 2023

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.

2022 remained a challenging year for business; as the world reopened following the restrictions imposed during the COVID-19 pandemic and the challenges continued for the UK labour market following Brexit. The introduction of Modern Slavery champions across our sites enabled us to deliver our programme and target our approach to those most at risk.

We remained reliant on our collaboration with industry groups, to enable 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.

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. We will look to join new collaborations to address the ongoing challenges, understanding that collectively businesses have a stronger voice to make the changes to protect the most vulnerable people in society.

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 2023



WESTBRIDGE FOODS LTD

Polonia House
Enigma Commercial Centre
Sandys Road
Malvern
Worcestershire
WR14 1JJ

Tel +44 (0) 1684 581800

CP FOODS (UK) LTD

Fordham Road
Newmarket
Suffolk
CB8 7NR

Tel +44 (0) 1638 722888

