

## Slavery & Human Trafficking Statement (Modern Slavery Act 2015)

S&B Herba Foods Ltd are a supplier of food ingredients to Manufacturers and finished goods to the Retail market.

We operate from 3 sites within the UK, two of which are manufacturing facilities. We are part of a bigger worldwide group, ultimately reporting to our Parent Company, Ebro Foods who are based in Spain.

We have just over 100 employees all based in the UK.

### Supply Chains

As a supplier and processor of Food Ingredients, we source raw materials from around the world, which along with Transport and Packaging are key elements in our Supply Chain.

The goods and services sourced to meet the needs of our business and those of our Customers extend to the following –

- Plant and Maintenance – (equipment and services at our 2 manufacturing facilities)
- Corporate Goods and Services, ie consultants, advisors, legal, communications, consumables

### Policies

As an Organisation we are committed to meeting Ethical standards through our policies and internal systems to ensure (to the best of our ability and systems) human trafficking is not present in our supply chains. We are confident that the integrity of our systems, procedures and behaviours of our employees reflect our Employment policies, which are regularly reviewed and updated in order to meet the ETI code and UK/EU Legislation. This is demonstrated by the following:

- Our Company Staff handbook includes a section on anti-slavery and human trafficking. This has been incorporated as a specific element of the Induction process.
- We have a clear Whistleblowing Policy, which was updated in 2019.
- We have a separate Business Conduct & Ethics Policy which refers to Child and Forced Labour. This is made available on site or via email to Suppliers; Customers; Temporary Employees; Contractors; Consultants and Auditors. This was updated in 2021.
- We have issued a new policy on Human Rights.
- Our Parent Company has a Code of Conduct applicable to all employees within the Group and has specific reference to its commitment to Human Rights. It also specifies that selection of Suppliers will also be on the basis they abolish all forms of child labour; eliminate all forms of forced and compulsory labour; avoid discrimination; respect maximum working hours and minimum wages established by the national laws of that country and that their employees work according to occupational safety and hygiene standards.

## Due Diligence Processes

We take compliance issues very seriously and carry out the following to identify and assess potential risk areas in our supply chain as well as document compliance. Our current processes include the following:

- Physical Factory Audits.
- Completion of questionnaires from our suppliers (food chain).
- Formation of a Committee with our Parent and Sister Companies to develop a joint database for recording and obtaining audit/compliance data on all our suppliers. This is work in progress.
- Our Operations Team agreeing risk indicators of our suppliers that fall outside of the “food supply chain”.
- Annual reporting to our Parent Company (Spain) on Corporate Social Responsibility activities as this is a requirement to satisfy their listing on the IBEX (Spanish stock market). Our responses and data are subject to Group Internal auditing and is an opportunity to identify any improvement in our policies.
- Both our Terms and Conditions of Purchase and Sale have been updated to reflect our stance and practice on Modern Slavery.

Both our manufacturing facilities are BRC accredited and are audited once a year.

We have had both our production facilities audited under the Sedex 4 Pillar Ethical Standard and members of Sedex can access these audit reports. These audits are valid for 2 years.

## Risk Assessments

Our Food Technical Team already has an established system for auditing our suppliers (food supply chain), either via physical audits or issuing Group Questionnaires. This is continually reviewed and updated.

In conjunction with our Parent Company and its subsidiaries, the Ethical & Sustainability Manager is working with the Technical Group Committee to gather information in a central location/database of all our food chain suppliers. The aim will be to identify suppliers that are a potential risk in addition to the suppliers that do not abide by the Ebro Foods Code of Conduct.

As a Company we understand the importance of having clear and concise information on our products, not only from a Traceability perspective but how they are produced and the labour practices involved in providing these goods and services. We hope a central database will give us the transparency to recognise good practices as well as identify any suppliers that fall short of UK Regulations and the standards required by the Ebro Foods Group.

For Suppliers of goods and services outside of the Food Chain, our database includes a section for monitoring questionnaires which is planned for development in 2022.

External Ethical Audits look at our policies and labour practices and provide valid guidance and feedback. To make this process more robust and to identify potential improvements, we will look at carrying out internal audits of our policies in 2022.

The monitoring and compliance of the Modern Slavery Act 2015 will be overseen by our Technical Manager and Human Resources Manager.



### Key Performance Indicators

We will continue to look at ways to improve our systems and policies and will use the following indicators to measure the effectiveness of our procedures.

- Compliance Results from Ethical Audits
- Customer feedback from SMETA audits

### Training

All employees have signed a copy of their Staff Handbook as well as the Business Conduct and Ethics Policy. This demonstrates that they have read and understood its contents which includes sections relating to Modern Slavery and Whistleblowing.

Managers have been briefed on the legislation so as to help answer queries or concerns.

Our Induction process now includes a section on Human Trafficking/Modern Slavery and an opportunity to ensure there is specific understanding in this area.

External courses have been attended by those overseeing the Monitoring and Compliance of this legislation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes S&B Herba Foods Ltd slavery and human trafficking statement for the financial year ending 31 December 2020.



Peter Cattaneo  
MANAGING DIRECTOR  
For S&B Herba Foods Ltd

Date: 15/06/2021

