

Real Good Food plc

Cake Decoration • Food Ingredients • Premium Bakery

STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

Introduction

This statement provides an update on progress of Real Good Food plc (the “Group”) during the financial year ending 31st March 2018.

The Board of Real Good Food plc fully understands and endorses the importance of ensuring our businesses continue to make progress in minimising and eliminating all potential modern slavery risks, and this statement outlines our progress to date.

As part of the food industry, we recognise our responsibility to take a robust stance on slavery and human trafficking.

We remain absolutely committed to preventing slavery and human trafficking in all corporate activities and to ensuring that our supply chains are free from such injustices.

Organisational Structure and Supply Chains

Real Good Food plc is a parent company to six operating companies operating in three distinct sectors of the food industry: Cake Decoration, Ingredients and Premium Bakery.

We manufacture ingredients and finished products and supply to all channels of the food industry in the UK, Europe, USA and Australia.

We have procurement teams in each of our businesses, which are co-ordinated through a central Group resource, and we source raw materials and packaging from the UK, USA, Europe, Africa and the Middle East.

Policies and Responsibility

During the year, the Group updated all of its employment policies and procedures and issued a new Company Handbook to all colleagues. The Handbook contained all relevant and appropriate policies and in particular the following are highlighted:

- **Whistleblowing**
The Group continues to encourage its employees to report in confidence any concerns relating to the activities of the organisation and the way in which business is conducted. An updated policy was issued as part of the Company Handbook to all staff.
- **Employee Codes of Conduct**

Our Leadership Framework and core values continue to be embedded into our ways of working in all businesses. The Framework directly addresses the need for ethical, competent and compliant relationships with our customers and suppliers.

This framework is integral to our ways of working as we continue to strive to maintain the highest standards of employee conduct and ethical behaviour in all business activities. This is particularly important as our business interacts with territories culturally different from our traditional markets and our supply chains operate on a global platform.

- **Ethical Trading**

The Group supports and adopts the Base Code of the Ethical Trading Initiative, along with our customers and suppliers.

All sites have performed well in ethical audits during the year and have been assessed against the new SMETA criteria.

Our procurement and supply chain teams have undertaken training and development which has enabled them to progress the development of risk assessment processes for suppliers and hauliers, which are based upon the requirements of the Base Code. Such audits and assessments will be conducted on an annual basis.

- **Anti-Bribery**

The Group complies with the requirements of the Anti-Bribery Act 2010 and has developed a policy which outlines our commitment to operating to the highest standards of conduct and integrity. The Group does not tolerate any form of bribery by or of its employees, agents or consultants, or any person acting on our behalf.

Our policy has been reviewed and updated and has been re-issued to all staff during the year.

- **Recruitment**

We carefully select our recruitment partners to ensure they source new employees in a manner which is ethical and legally compliant. We retain a list of approved partners which is adopted throughout the Group and reviewed on a continuing basis. Those approved partners are actively encouraged to undertake appropriate training.

“Stronger Together” training has now been embedded into induction and recruitment processes throughout the Group and our agency providers have similarly adopted this approach.

Our businesses continue to liaise closely on supplier approvals in all aspects and any business partners who deemed to be unsuitable or do not meet our requirements are not used across the Group.

- **Corporate Social Responsibility**

Each business continued to develop plans in line with the Group’s CSR framework. Work with local communities and educational establishments continues and many of our teams have active fund-raising and social committees to support local, worthy causes.

Diversity and inclusion training for managers has been conducted throughout the organisation during the past year and will continue to receive appropriate focus and attention.

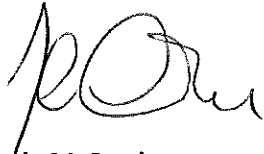
Responsibility for the policies outlined above is shared by the Main Board and the local Boards of Directors. The policies have all undergone recent review and will be reviewed on an annual basis.

Continuing Actions:

The Group is developing an in-house training and development plan which will encompass all aspects of the Modern Slavery Act and its impact on us as individuals and corporately. This training can then be rolled out across all businesses on a regular basis to ensure this remains at the forefront of our ways of operating.

From a procurement and supply chain point of view, we will continue to build on the good work being developed by the local teams as we seek to ensure an ethical supply chain across the Group.

This statement has been approved the board of Real Good Food plc, who will review and update it annually.

A handwritten signature in black ink, appearing to read 'H Cawley', written over a thin horizontal line.

Hugh C L Cawley
Executive Director

29th June 2018