

# Real Good Food plc

Cake Decoration • Food Ingredients • Premium Bakery

## STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

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### Introduction

This statement provides an update on progress of Real Good Food plc (the “Group”) during the financial year ending 31<sup>st</sup> March 2019.

The Board of Real Good Food plc fully understands and endorses the importance of ensuring our businesses continue to monitor, minimise and eliminate 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 the abhorrent practices of 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 the parent company to three operating companies in two distinct sectors of the food industry, as we classify them, Cake Decoration and Food Ingredients.

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

We have procurement teams in each of our businesses, each of which are responsible for ensuring that they are compliant with our Group policies and that raw materials and packaging are ethically sourced from the UK, USA, Europe, Africa and the Middle East.

### Policies and Responsibility

The Group annually reviews and updates its employment policies and procedures, the leadership teams within each of the businesses are responsible for the implementation of these within their businesses. There are a number of Group policies that are relevant and appropriate to modern slavery, these are:

- **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. This includes any circumstances that may give rise to a risk of slavery or human trafficking.

- **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.

We are Sedex members, we have been assessed against the new SMETA criteria and continue to perform well in ethical audits during the year.

Our procurement and supply chain teams have undertaken training and development which has enabled them to progress the development of a risk assessment process for suppliers and hauliers, which are based upon the requirements of the Base Code. We currently work with our high-risk suppliers to ensure that they have action plans in place that will allow them to continue to confirm and meet with our Ethical Code of Practice.

Any partners or suppliers who fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, will be subject to sanctions which include termination of the business relationship.

- **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 identify 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 we continue to ensure that any agency providers with which we work adopt this approach.

- **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 worthwhile local 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 businesses have developed their own training and development plans which encompass all aspects of the Modern Slavery Act and its impact on us as individuals and corporately. This training will continue to be reviewed and refreshed annually 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.

**Hugh C L Cawley**  
**Chief Executive**

**June 2019**