



Bright Brilliant Fabulous

Modern Slavery Act Transparency Statement 2018

This statement applies to Bright Blue Foods Limited; and any subsidiary of BBF (Holdings) Limited as defined in section 1159 of the Companies Act 2006 (Group Company), which includes but is not limited to BBF (Hull) Limited within the UK, covering all business areas and departments therein. Accordingly, any reference to "BBF", "BBF's", "the Company", "Company", "we", "us" or "our" is a reference to Bright Blue Foods Limited and/or a Group Company.

BBF is committed to preventing slavery and human trafficking in its corporate activities and to working collaboratively with its supply chains to eradicate modern slavery and human trafficking. The statement outlines BBF's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 July 2017 to 30 June 2018.

Organisational Structure and Supply Chains

BBF is one of the UK's leading ambient cake and chilled dessert manufacturers of retailer own label, licensed and branded cakes, supplying recognisable retailers across the UK and European market. BBF has five bakeries based in the UK and Poland, employing over 1500 people. We source over 500 ingredients from around the world, our suppliers, in turn, work with thousands of their own suppliers globally.

The most prevalent high-risk area identified in relation to slavery and human trafficking within BBF is the usage of seasonal, temporary workers across the BBF bakeries. We have a robust and well established audit in place to manage this risk that is continually reviewed and updated accordingly, in accordance with guidance from Stronger Together and the GLAA.

Since our supply chain is global and multi-tiered, from 19 July 2017 we made it a requirement for all suppliers to be members of Sedex to enable us to identify high risk suppliers.

The directors of BBF are responsible for the organisation's anti-slavery initiatives, for ensuring effective modern slavery risk assessment and due diligence activities are in place and for ensuring effective training is in place across the organisation to ensure employees understand and can respond to the identified slavery and human trafficking risks.

During induction, all BBF employees undertake a training session that covers;

- What modern slavery, forced labour and hidden labour exploitation is
- Understanding the potential impacts of modern slavery
- Knowing how to recognise the signs that someone may be being exploited and who to tell
- Employees are also made aware of the whistleblowing procedure

The training is thereafter delivered annually, utilising best practice resources, such as from the Stronger Together tool kit.



Organisational Policies

BBF has the following policies in place that relate to modern slavery;

- **Whistleblowing**
BBF encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures.

This policy / process is communicated during induction and then re-communicated during refresher inductions each year. Posters are displayed around our sites and information regarding this is available for all employees to access.

- **Recruitment policy**
BBF only uses specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency.

BBF does not currently have a specific policy on modern slavery, the objective is to develop and implement this across the organisation during the next financial year.

Due Diligence

At BBF we undertake due diligence when considering taking on new suppliers and we regularly review our existing suppliers. Our due diligence includes;

- Establishing and maintaining a risk profile of each supplier.
- Mandatory membership of SEDEX for all suppliers.

Performance Indicators

For the financial year 1 July 2017 to 30 June 2018, BBF set KPIs to focus on building capability and awareness across the business;

- requiring all factory based employees to have completed training on modern slavery by June 2018
- for temporary labour provider audits to be conducted twice a year, including interviewing at least 20% of the total number of agency workers

Training

Training and raising awareness were key focuses for BBF from 2017-2018, working to build capability of key employees and site management teams, whilst raising awareness business wide.

BBF requires all HR professionals within the business to attend a modern slavery training session, delivered by Stronger Together. Modern slavery training is delivered as part of the induction for all employees, on all sites and this is then refreshed every 12 months. This training takes place in the form of workshops and utilises videos from Stronger Together and the GLAA.



As well as training employees, BBF has raised awareness of modern slavery issues by putting posters up across the sites and circulating leaflets. These materials explain the employees;

- the basic principles of the Modern Slavery Act 2015
- how employers can identify and prevent slavery and human trafficking
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the modern slavery helpline

The statement was approved by BBF's board of directors who review and update it annually.

****This is a revised statement, further to the statement published, dated 29 June 2018****

Jonathan Lill
CEO

15 May 2019

