



Edible Oils Limited

Modern Slavery Statement 2021

What is modern slavery?

Modern Slavery is a crime and a violation of fundamental human rights. Modern slavery can take many forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which results in common deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We recognise that modern slavery is a global issue and is linked to the rise in global migration. Slavery exists in every region of the world and in most types of economies, whether industrialised, developing or transitional. No industry or sector can be complacent or be considered immune.

Edible Oils Limited is committed to respecting, protecting and championing the human rights of all those who come into contact with our operations.

This statement has been published in accordance with the UK's Modern Slavery Act (2015) and provides an update on our activities and commitments to prevent modern slavery in our operations and supply chains, and sets out the steps we have taken during the financial year 2020/2021 which ended on 31st March 2021.

About Edible Oils Limited ('EOL')

EOL is a manufacturer and distributor of edible oils and white fats to the retail and food service sectors. It is a joint venture between Princes Limited and Pura Foods Limited, whose ultimate parent companies are Mitsubishi Corporation and Archer Daniels Midland Company respectively.

EOL has over 150 employees with production sites in Erith and Belvedere in Kent, England.

Relevant Policies and Contractual Controls

EOL is committed to upholding human rights and fully supports the UN Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

The EOL Code of Conduct, which is subject to regular review, provides guidance to employees on local laws and global standards such as the Universal Declaration of Human Rights. All employees must use the Code of Conduct as a guide in daily operations, to be aware of their responsibilities including as to slavery and human trafficking, to review the relevant laws and internal company rules and to conduct themselves with integrity.

Our Ethical Trade & Human Rights Policy was established in 2013 and is reviewed on an annual basis. It requires adherence to all international norms and codes regarding human rights, including the Universal Declaration on Human Rights (www.un.org) and the core labour standards of the International Labour Organisation (ILO) (www.ilo.org). It is a requirement for EOL's suppliers to comply with (i) all applicable local and international laws, which would include those relating to labour used in the supply of finished goods and raw materials, and (ii), contractually, to the principles of the EOL Code of Conduct, which incorporates respect for human rights and the EOL Ethical Trade & Human Rights Policy.

Our supply chains

We take a partnership approach with suppliers, seeking to foster long term supply agreements in order to provide security and integrity, including respecting human rights and combatting slavery and human trafficking that we, our customers and consumers' demand.

Our suppliers provide both finished goods and raw materials for manufacturing across all of our core product areas, which are edible oils and fats.

Risk Assessment and Due Diligence

Risks of modern slavery are dynamic and can quickly evolve. As a result we regularly assess and respond to risks in our business and wider supply chain.

All EOL owned sites are registered on SEDEX (Supplier Ethical Data Exchange), a not-for-profit organisation dedicated to driving improvement in responsible and ethical business practices in global supply chains.

SEDEX provides us with an initial risk assessment for suppliers and supply chains with country and product category specific intelligence. This allows us to monitor and mitigate the risk of slavery and human trafficking by providing insight into any high-risk areas. In addition, our own knowledge and experience from cross functional teams, allows us to make informed risk assessments for specific raw materials, sectors and countries.

We use SEDEX to help us assess risk and manage compliance across our manufacturing sites and direct suppliers.

Our risk assessment shapes our future purchasing strategy, audit schedule and any remediation action necessary with the supplier or, using our influence, to instigate positive change in the wider supply chain or industry.

All employees receive the EOL Code of Conduct and are given regular training which is monitored by our Compliance Committee.

We actively support employee engagement, representation, and the ability of an employee to raise concerns. Freedom of association and the right to collective bargaining are core labour standards that we respect, as guided by the ILO. We apply our employment practices to ensure they meet, as a minimum, legislative requirements.

Both of our UK production sites are also SEDEX registered and undergo regular audits.

All temporary agency labour currently used in our UK operations is provided through Association of Labour Providers member companies who are registered Stronger Together Business Partners. They all have a documented Hidden Labour Exploitation Policy and have demonstrated a commitment to raising awareness of hidden labour exploitation through their processes and through communicating key indicators to operational staff. We are also enhancing our audit process considering the Stronger Together Checklist, annual assessments and action plans.

A number of companies provide services to our production sites such as cleaning, security and staff restaurants. In 2020/21 we continued to proactively engage with all third-party companies that provide services to our operations. We consider the greatest risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and direct managerial oversight are out of our direct control.

Monitoring and Auditing

Via our Ethical Trade & Human Rights Policy, we communicate to all our suppliers that EOL may conduct risk assessments and onsite evaluations of suppliers including requiring independent ethical trade audits to be undertaken at appropriate intervals.

If we identify cases of non-compliance to our Policy or any relevant legislation, we communicate our remediation requirements and provide support for redressing specific issues. If the supplier is unable to satisfactorily address these issues, we reserve the right to terminate business with immediate effect. This is a provision in our Standard Conditions of Purchase.

In the event of evidence of a labour violation in our upstream supply chain we will address the issue with our supplier but also seek to work with relevant stakeholders such as government, appropriate trade bodies and Non-Governmental Organisations in order to resolve issues. If it is possible to identify individual cases of unethical working practices, we will eliminate the individual supplier from our supply chain if remediation action is unsatisfactory.

Key Performance Indicators

EOL is committed to measuring and monitoring our ethical trading performance to maximise focus within our business and supply chain.

Following on from our commitment in our 2020 statement to measure and report against a number of indicators, we can confirm:

- There were zero incidences of modern slavery identified at our EOL UK sites during the year.
- For the Belvedere site (Sedex site reference: ZS1066095) the most recent third-party ethical audit was undertaken on 10th November 2020, with a follow-up audit undertaken on 10th June 2021. The next audit is scheduled before 10th November 2022.
- For the Erith site (Sedex site reference: ZS1066108) the most recent third-party ethical audit was undertaken on 12th November 2020, with a follow-up audit undertaken on 14th June 2021. The next audit is scheduled before 12th November 2022.

Business Critical and Critical Non-Conformances

EOL uses the Sedex Members Ethical Trade Audit Non-Compliance Guidance to assess the significance of a criticality of an audit non-conformance.

A Business Critical Non-Conformance (NC) represents a critical breach of an ETI base code item or local law resulting in an issue which presents a critical or imminent risk to worker's safety / critical risk to life and limb or which constitutes a critical breach of workers' human rights. This may put either new business or ongoing business at risk and will therefore require immediate correction or improvement.

A Critical NC is a severe breach which represents a danger to workers / those on site, or which constitutes a severe breach of workers' human rights; a severe material breach of an ETI base code requirement / law; a systematic and deliberate breaking of a code requirement / law; an attempt to pervert the course of the audit through fraud, coercion, deception, interference or deliberate damage to brand reputation; or a major non-compliance that has not been addressed over time, or for which no significant improvement has been made.

We are pleased to report that there were zero overdue and outstanding Business Critical or Critical Non-Conformances within our EOL UK sites.

Partnering to address root cause issues

EOL recognises the benefit in collaborating with third parties to drive meaningful change and address some of the root cause issues of large and complex modern slavery incidences.

Our collaborative partners include:



Ethical Trading Initiative (ETI)

ETI is a leading alliance of companies, trade unions and non-governmental organisations that promotes respect for workers' rights around the globe. The ETI was founded in 1998 in response to growing concerns about the poor pay and conditions of workers in many international supply chains.



Food Network for Ethical Trade (FNET)

FNET is a network of UK food companies collaborating to improve working conditions in supply chains.

The activities of FNET consist of supplier support, tools including risk assessment and guidance, collaborative working and joint learning to form a framework for identifying, managing and responding to global food supply chain ethical trade risks.



Indirect Procurement Human Rights Forum (IPHR)

Princes are part of a ground-breaking initiative which, through industry-wide collaboration, is looking to improve the human rights of workers in indirect procurement (also known as Goods and Services Not for Resale) supply chains.



Supplier Ethical Data Exchange (Sedex)

Sedex is one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains, used by more than 60,000 members in over 180 countries. Sedex is one of the ethical trade organisations that we require our suppliers to be members of, as part of our Ways of Working requirements. The platform can be used by buyers, suppliers and auditors to quickly identify and share indicators of forced labour and modern slavery.

Training & Awareness Raising

We understand the importance of building compliance capability across our business, and we are continuing to work hard to embed our approach and engage our employees.

We continue to use the Modern Slavery Act (2015) as an opportunity to embed greater understanding of human rights within our supply chains, and to extend this awareness as far down our supply chain as possible.

Our Code of Conduct training – our way of ensuring that all employees fully understand what is expected of them – is delivered both online and in-person for our colleagues at manufacturing sites.

This training is mandatory and covers all areas of our Code, with specific emphasis on key topics reinforced by scenario-based examples. Our Code of Conduct training is refreshed annually to ensure all materials reflect the latest insights and expectations.

Since 2019 we have promoted the Chartered Institute of Procurement and Supply's (CIPS) Ethics Mark, a certification which requires companies to adopt CIPS Code of Ethics, make a public commitment to sourcing ethically and to train and test all staff responsible for sourcing and management of suppliers.

We were delighted to retain our recognition via the internationally published listing on the CIPS Corporate Ethics Register. In order to achieve this recognition, procurement colleagues have demonstrated their respect and awareness of international standards against criminal conduct, including bribery, corruption, fraud and human rights abuse, protecting Princes from potential supply chain malpractice.

The behaviours learnt from the training can be combined with our supplier management approach to increase the number of purchasing and sourcing decisions which take into account ethical trading and human rights.



Stronger Together Business Partners

Following extensive work undertaken by colleagues at our manufacturing sites, we have retained Stronger Together Business Partner status.

Stronger Together is a multi-stakeholder, business-led initiative aimed at reducing modern slavery, particularly hidden forced labour, labour trafficking and other third-party exploitation of workers.

Stronger Together focus on creating advice that is practical, pragmatic and easy for any business, of any size to understand and use.

All manufacturing sites (as well as our Princes Group Head Office) were formally registered as Stronger Together Business Partners – recognising our commitment to tackling hidden labour exploitation and modern slavery.



Priorities for the coming year

Within the context of our broader human rights commitments, we recognise the importance of maintaining constant vigilance to identify and address any activities associated with slavery and human trafficking throughout our global operations and supply chains.

In recognition of the importance of these issues, we are committed to continuing to enhance our capacity to identify, prevent and mitigate any actual or potential activities in this field.

In the coming financial year we will continue to increase awareness of ethical trading and modern slavery with all relevant and internal stakeholders as well as with our direct suppliers. We will also use one of our shareholding companies, Princes Limited's, membership of the ETI to help us further understand human rights issues in our supply chain.

Approval

I, Mark Church, hereby certify that the information contained in the above statement is factual and has been approved by Edible Oils Limited's Board of Directors.

A handwritten signature in black ink, appearing to read "Mark Church".

Mark Church
Managing Director (Edible Oils Limited)
September 2021