



## Jigsaw Foods

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

#### Introduction

This statement sets out Jigsaw Food's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and its supply chains.

This statement relates to actions and activities during the financial year 1 June 2017 to 31 May 2018.

As part of the food manufacturing industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

#### Organisational structure and supply chains

This statement covers the activities of Jigsaw Foods Ltd:

- We are dedicated to creating a memorable eating experience with our foodservice and food manufacturing customers, through the innovation and manufacture of sauces, mayonnaise, marinades, dressings and cryogenically frozen pellets (flavoured butters, melts, sweet and savoury sauces). The nature of the products we manufacture means we source raw materials globally.

#### Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Functional Senior Managers are responsible for putting in place and reviewing relevant policies for their areas, in consultation with the wider management team and ultimately approved by the relevant Director.
- **Risk assessments:** HR meet regularly with the 2 suppliers of temporary labour and conduct a formal audit every 6 months. Technical assess new suppliers against their compliance to the Ethical Trade Initiative (ETI) Base Code as a minimum. This is then reviewed as a minimum every 3 years with the supplier approval review.
- **Investigations/due diligence:** HR and/or Technical Manager are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. If a concern is identified or raised, a full and formal investigation will take place and appropriate actions recommended to Directors.
- **Training:** Representatives have undergone 'Stronger Together' Modern Slavery training with further training planned. This will be summarised into a Modern Slavery Awareness Presentation to our team members.

## Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** Jigsaw Foods 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. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report them to a Manager, Director or confidentially via the secure HR Mail boxes.
- **Employee code of conduct and Anti-Corruption & Bribery Policy** Jigsaw Foods' code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Social Accountability/Ethical Trading Policy & Supplier Approval Procedure** Jigsaw Foods is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the ETI Base code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Temporary Agency Workers Policy** Jigsaw Foods uses only specified, reputable employment agencies to source temporary labour and always verifies the practices of any new agency it is using before accepting workers from that agency. We have conducted full audits of the two temporary labour agencies that supply our factory with temporary labour. To ensure compliance with UK law and company policy, the agencies used are required to be members of the GLAA and abide by the ETI base code. The audits include a review of contract agreements between the agencies and their employees, a review of their right to work documentation, training records, policies and specific attention to the implantation of their own Modern Slavery statement. We also independently interview a sample of the agency workers seconded to us, to verify compliance.

## Due diligence

Jigsaw Foods undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;

- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular.
- Using SEDEX, where suppliers can be monitored for their labour standards, compliance in general, and modern slavery/ human trafficking in particular; and

- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### **Performance indicators**

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring Managers and Supervisors to have completed training on modern slavery by June 2019;
- Continues to develop a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains whereby the organisation evaluates all existing suppliers.

### **Training & Awareness-Raising**

Jigsaw Foods requires Technical Managers/HR professionals within the organisation to complete training on modern slavery and will deliver in-house training to Managers and Directors.

As well as training staff, Jigsaw Foods has raised awareness of modern slavery issues by putting up posters across our premises/circulating a series of emails to staff.

### **Board Approval**

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Jigsaw Foods Ltd slavery and human trafficking statement for the financial year ending 31<sup>st</sup> May 2018.

Approved by the Board of Directors.

Director's signature: 

Director's Name: CHRISTINE MOIR

Date: 29/03/19

