



**TULIP**



# **Modern Slavery Act**

**2019/20 STATEMENT AND  
INFORMATION  
DOCUMENT**



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## Modern Slavery Act Statement

This statement sets out Tulip Ltd.'s actions to understand all potential modern slavery risks related to its business and supply chain, the steps it puts in place to ensure there is no slavery or human trafficking. This statement relates to actions and activities during the financial year 1st October 2018 to 31st December 2019. This reflects the company change in end of year reporting.





## Organisational Structure and supply chains

This statement covers the activities of Tulip Ltd ([www.tulipltd.co.uk](http://www.tulipltd.co.uk)), which is now part of the global Pilgrims Pride Corporation. (<https://www.pilgrims.com/>) Pilgrims has headquarters in USA and also owns Moy Park, which is also based in the UK.

Tulip provides a wide range of quality, cost effective and innovative products to retail, wholesale and food service sectors across the UK. We are the country's number one producer of higher welfare pigs. Our shared vision with Pilgrims Pride Corporation is to become the best and most respected company in the industry, which creates opportunity for a better future for our team members. It's strategic pillars are based on becoming a more valued partner with key customers, relentlessly pursuing operational excellence, safe people, safe products and healthy attitudes and to develop a unique portfolio of diverse, complementary business models. Tulips foundations and strength lie in its core values of Determination, Simplicity, Availability, Humility, Sincerity, Discipline and Ownership.

We operate across 15 sites in the UK with 5,889 permanent employees with up to an additional 2,100 additional agency workers at peak periods.

We fully support the United Nations Guiding Principles on Human Rights and during this year will seek to become members of UN Global Compact. ([www.unglobalcompact.org](http://www.unglobalcompact.org)) Through our Responsible Sourcing Policy and working with other suppliers and customers, we aim to implement these principles within our business and wider supply chain. We are founding members of FNET (Food Network for Ethical Trade) (<https://foodnetworkforethicaltrade.com/>) which helps us to achieve impact within our and the wider food supply chain. We also map all our sites and our supplier sites in Sedex (<https://www.sedexglobal.com/>) and all of our sites are subject to an 3rd party independent ethical audit at least every 2 years.





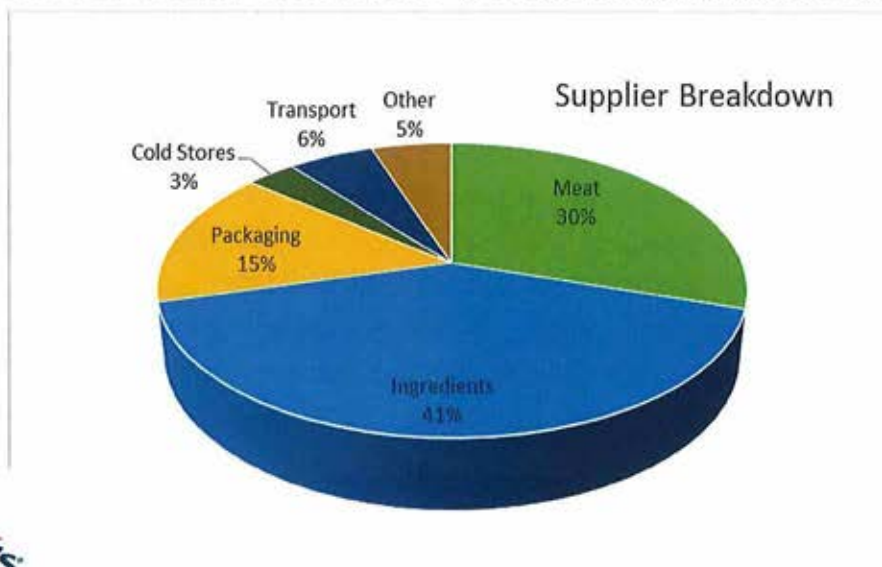
We receive pigs from:

420 RSPCA Assured finishing farms supplied by 91 Outdoor Breeding Farms and 380 Standard Red Tractor finishing farms.

The RSCPA farms are assured to Freedom Food (<https://www.rspcaassured.org.uk/>) and Red Tractor Standards (<https://assurance.redtractor.org.uk/>). The standard Red Tractor Farms would be assured to Red Tractor Standards only.

Our lambs are supplied from 400 farms across Wales and the West Country. Of these 72 farms are certified organic. All our farms are assured to Red Tractor Standards (<https://assurance.redtractor.org.uk/>). We also implement our own Lamb Production Protocol which is above Red Tractor Standard and is independently audited.

We currently deal with 785 suppliers across the group. 69% of these are based within the UK. Our Top 30 non meat suppliers account for 77.6% of our total spend and these are key for us to work in partnership with and also help them build their own capacity in this area.







## 2 High Risk Activities

The following activities are considered to be at high risk of modern slavery or human trafficking

- Typically, as a food manufacturer we do use agency labour on all our sites to cope with peaks in demand.
- The farms that supply pigs to our network of abattoirs.
- Suppliers within our supply chain where we do not have direct management control. These are suppliers who either supply us ingredients which make up the products that we sell or packaging for these products.
- Transport and logistics companies used to transport raw materials and finished goods.



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## Risk Assessment and Due Diligence

The risk of modern slavery and human trafficking within our organisation we believe is mitigated as a result of the policies and procedures we have in place and also the knowledge and skills of our employees.

Good practices that are embedded within all Tulip Ltd sites are

**GLAA (Gangmasters and Labour Abuse Authority)** (<http://www.gla.gov.uk/>)

- We have strong working links with the GLAA. They are responsible for the licensing of labour providers within the food and agricultural sectors in the UK. They also work with the police and other agencies to investigate and prosecute cases of modern slavery and exploitation.
- Our Responsible Sourcing Manager sits on the Labour Providers and Users Advisory Board which works to implement best practice and learnings within the industry.

**Stronger Together** (<https://www.stronger2gether.org/>)

- Stronger Together awareness raised at all inductions
- Stronger Together deeper training carried out by all site HR staff
- Additional training completed by all Supervisors and Line Managers
- Posters displayed on all sites in multiple languages
- Independent 3<sup>rd</sup> party whistle blowing hotline available in multiple languages
- Checks carried out on addresses and bank accounts by payroll staff at start of contract

We are active associate members of the ALP

(Association of Labour Providers - <http://labourproviders.org.uk/>) and have hosted training events and seminars on our sites and staff across the group have attended.





## Employment Agencies

- Annual agency internal audit by our HR Team which includes interviews of random workers
- Annual 3<sup>rd</sup> party agency audit which includes interviews of random workers and check on both the site and Head Office operations of agencies we use
- Primarily one agency across most of our sites with a strict Service Level Agreement in place with a commitment to Modern Slavery Prevention
- Annual agency worker surveys which include Stronger Together related questions
- Strong compliance culture within the agencies and a close working relationship with the GLAA.
- Working together to solve issues on a practical basis and remediate where required

## SEDEX - (<https://www.sedexglobal.com/>)

- SMETA ethical audits on all our sites every 2 years. A number of our sites have additional ethical audits in place in line with their customers specific requirements.
- Pro-active response internally to address issues before an audit
- Members of the Sedex Stakeholders Forum which works to improve standards and provide clarity in interpreting the standards.
- Requirement of all suppliers to Tulip Ltd with over 30 employees to be linked with us on SEDEX and share results of SAQ's and audits





## Employees

- We have Trade Unions present on some sites and Works Councils on all sites and actively promote and support employee engagement
- Dignity at Work – All employees are expected to work with integrity and respect for each other. All employees receive Dignity at Work training as part of their induction and are free to raise any issues with the management team on site or to utilise the whistleblowing line.
- Re-launch of our whistle blowing line using the same provider as Pilgrims Pride. This will be opened up for all stakeholders of the business to use to report any issues affecting them.
- Bi-annual surveys of employees and action plans developed to implement any required changes as a result of these

The processes and procedures on the previous page are under the responsibility of the VP HR, Site HR Managers and the Responsible Sourcing Manager.

As part of the risk assessment process we have now implemented a Modern Slavery Policy included in the appendix.

Listed on the flowing pages are the issues we have uncovered during the year and the work we have done to mitigate the risks across our business and supply chain.





## Report on work undertaken in

### Modern Slavery Victims At Linton Site

As a result of a supervisor raising concerns with the site HR Manager, we promptly launched our remediation/investigation procedure in Modern Slavery. Whilst the potential victims were removed to a place of safety over the weekend, our Responsible Sourcing Manager together with the Head of Compliance for Staffline arrived at the site to interview the 2 potential victims. As a result of this interview we concluded that this was likely to be a case of Modern Slavery./forced labour. We reported this to the GLAA who attended site to further interview the 2 workers. As a result of this an arrest was made of a suspected gang master. The victims did not want to be referred into the National Referral Mechanism and decided that they would move location to a different area . We supported them by employing them on full time contracts and helped them to settle into their new address.

As a result of this we decided to widen the investigation to ensure that all workers on our site we also not victims potentially hidden. Our Responsible Sourcing Manger spoke to over 150 workers in their own native language. As a result we discovered another potential victim. We made the decision to remove him from the site and place him into temporary hotel accommodation. Working with Cambridgeshire Police and the Salvation Army the victim decided he did want to go into the Nation Referral Network which we supported him to do.

The suspects involved are part of a wider ongoing criminal investigation.

No further issues were uncovered at the site during this process.





2 weeks later our Responsible Sourcing Manager returned 2 weeks later to carry out a further 80 interviews of workers across all shift patterns following concerns that were raised as part of an exit interview. However no evidence was discovered of any issues during this process.

Due to close proximity of the site to our Bury St Edmunds site our Responsible Sourcing Manager also attended and interviewed 35 workers to ensure that there was no similar issues raised. There were no items of concern raised during this process.

### **Unannounced audits**

We have continued this year with 4 unannounced welfare audits at our sites. This is a joint operation with Staffline Compliance Team. We interviewed random samples of workers to check on ethical standards and to ensure Modern Slavery policies and procedures were being correctly followed and were understood by our colleagues. Also as an additional check on their welfare. No further issues were uncovered during this. We will continue this through the next year to cover all our sites on a bi-annual basis.

### **Bright Futures**

We are proud business partners of the Bright Futures scheme (<http://brightfuturesuk.org/>)

This enables victims of Modern Slavery to return to work via a paid 4 week placement and if desired a non competitive interview for a role once satisfactorily completed. This year we have placed 8 people at across Ashton, Corsham and Tipton sites, 4 of these went on to secure permanent employment and have become valuable members of our teams. During the year our Responsible Sourcing Manager has been part of a working group with other business and charity partners to establish Bright Futures as a stand alone organisation specialising in the rehabilitation of Modern Slavery victims into work. We have a number of people waiting to start placements and will continue to provide this opportunity through the coming year.





### **Stronger Together Organisational Performance Assessment**

We have updated this assessment this year as part of our continual improvement. We have increased our percentage score by over 23% as a result of implementing the actions from last years assessment. This assessment is designed to evaluate our business both at business and site level and supply chains approach to dealing with Modern Slavery and to help direct our priorities going forward. This includes worker interviews, commitment to tackle Modern Slavery, assessing and acting to reduce the risk of Modern Slavery, providing remedy and monitoring of progress and communicating our progress. It found we have strong processes and procedures in place and we have effective systems in place to reduce the risk of Modern Slavery. The actions undertaken as mentioned previously at our Linton site have provided us the opportunity to test and refine our processes and procedures.

### **Supply Chain**

We are proud to be founding members of FNET (Food Network for Ethical Trade) (<https://foodnetworkforethicaltrade.com/>). This is a supplier led initiative with over 40 suppliers and 10 retailers as members which focusses on improving human rights within supply chains. We use the risk assessment tool to assess human rights risk within our business and work as part of collaborative working groups to tackle issues within our supply chains. Our Responsible Sourcing Manager is a member of the Strategic Advisory Group which is part of the board structure.

The main areas of focus for work in supply chains is Transport and Logistics, Risk Assessment Group and Worker/Supplier Engagement. We are leads within the engagement group. This year we have created director and buyer training on human rights and our focus for this year is worker information

As part of the Transport & Logistics Group we have re assessed our impact and are holding in early 2020 a joint event with Stronger Together to raise awareness and hopefully begin some joint work in this area across all our transport and cold stores providers.



### Temporary Labour Agencies

We have had a full programme of audits at all agencies who supply us with labour throughout the year. No major issues were discovered during this and any minor action points will be checked by our HR Teams when they undertake a follow up audit within 6 months.

### Farms

We have continued to work with our farmers on their processes and procedures around Modern Slavery and to improve visibility of the topic. Our whistle blowing line is now available to all our farmers and interested stakeholders to report any issues. Our field team have continued their risk assessment and support work with our Outdoor Bred farmers which has included work with them on site in areas of policy and procedures. We will continue to support this ongoing programme through the year, especially as labour shortages are seen to be increasing as a result of Brexit.





## Last Years Targets





5.0

## Targets for current year

Undertake a Human Rights Impact Assessment on our supply chain

Use to set priorities of working and develop to publish and report on progress

By end October 2020

All suppliers with over 30 employees to be linked on SEDEX and have a valid audit

Target of 85% linked and 40% with a valid audit

End of September 2020

Increase the number of Modern Slavery victims supported by Bright Futures programme

Increase 50% on last years placements and also number converted to full time employment

By end December 2020





## Board Member Approval

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year.

CEO Signature

CEO Name

ANDREW CRACKNELL

DATE

02/03/2020



# TULIP



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Tulip Ltd shall periodically review our Policies in order to ensure its continued adequacy and relevance for our business. The most recent version will always apply.