



# **Modern Slavery Act**

## **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. It puts in place steps to ensure there is no slavery or human trafficking. This statement relates to actions and activities during the financial year 1st October 2016 to 30th September 2017





## **Organisational Structure and supply chains**

This statement covers the activities of Tulip Ltd ([www.tulipltd.co.uk](http://www.tulipltd.co.uk)), part of the Danish Crown family ([www.danishcrown.com](http://www.danishcrown.com)), which is a leading meat manufacturing company covering farm to fork. Primarily a pork based business with farms, abattoirs and processing factories, we supply all the major UK retailers and food service customers. Our fully integrated business is spilt into four distinct divisions:

Tulip Agriculture – UK number one pig farmer and leader in higher welfare standards

Tulip Fresh – UK number one pig processor and the operator of abattoirs

Tulip Food Company – Further processing of meat from Tulip Fresh into high quality food products

Dalehead Foods – 100% dedicated to supplying Waitrose with pork and lamb products

We operate in 18 sites across the UK with 5,723 permanent employees and approximately 1,250 additional agency workers at peak production time.

### [Tulip Sites](#)

We are signatories to United Nations Global Compact ([www.unglobalcompact.org](http://www.unglobalcompact.org)) and fully support the United Nations Guiding Principles on Human Rights. 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 working with our parent company Danish Crown to further align our work to the Sustainable Development Goals.

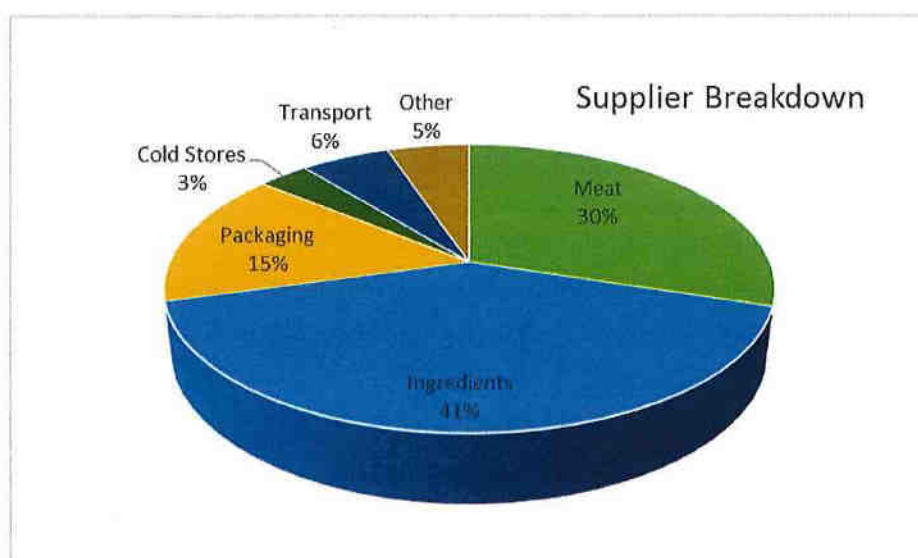


We receive pigs from:

420 RSPCA Assured finishing farms supplied by 113 Outdoor Breeding Farms and 580 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.

We currently deal with 742 suppliers across the group. 67% of these are based within the UK. Our Top 30 non meat suppliers account for 78% 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.





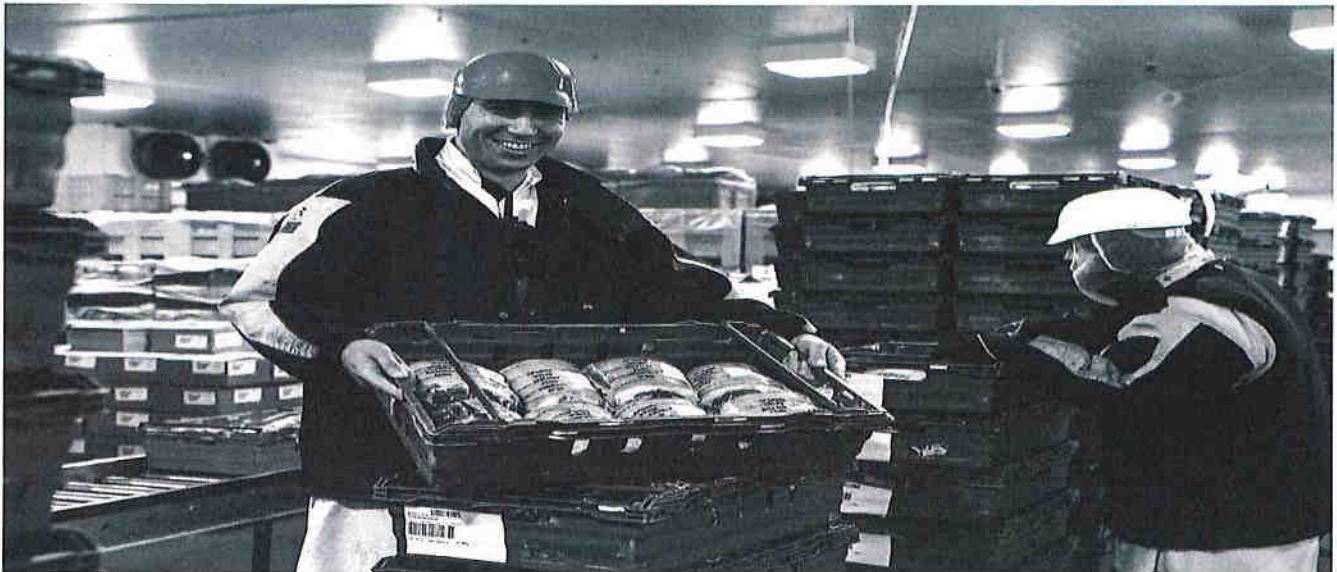


## High Risk Activities

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 abattoir.
- Suppliers within our supply chain where we do not have direct management control.
- Transport and logistics companies used to transport raw materials and finished goods.

Highlighted further in the report are the actions we have undertaken as due diligence and risk mitigation in these and other areas



## Risk Assessment and Due Diligence

The risk of modern slavery and human trafficking within our organisation we believe is heavily 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

- Stronger Together awareness raised at all inductions
- Stronger Together deeper training carried out by all site HR staff
- Additional Supervisor/Line Manager training completed by 793 staff
- 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

Active members of the ALP (Association of Labour Providers - <http://labourproviders.org.uk/>) and have hosted training events and seminars on our sites





### **Agency**

- Annual agency internal audit which includes interviews of random workers
- Annual 3<sup>rd</sup> party agency audit which includes interviews of random workers
- Primarily one agency across all 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
- Compliance culture within the agency and a close working relationship with the GLAA.

### **SEDEX**

- 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 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.
- Bi-annual surveys of employees and action plans developed to implement any required changes as a result of these



## Community

- Together with the Co-Op we are working to support victims of Modern Slavery through the Bright Futures programme. This is a programme to support victims of Modern Slavery into paid employment by offering paid supported work experience and if suitable a permanent job. This programme will assist victims in rebuilding their lives in a positive way.

The processes and procedures on the previous page are under the responsibility of the VP of HR, Senior Team of HR Business Partners and the Responsible Sourcing Manager.

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

As identified earlier in this report our high risk areas are as follows and the extra due diligence work we have done on this is listed below.





### **Farms that supply pigs to abattoir**

During the year we developed a risk assessment tool that was rolled out across a high proportion of our farms, including both pig and sheep farmers. This has enabled us to get a clear view of our supply chain and identify and address any potential ethical issues. We now have a better understanding of the top issues within our farming supply chain and will tailor our future support to tackle those key areas. Our action plan following the risk assessments will target:-

- Responsible Recruitment – Educate further on responsible recruitment highlighting documentation proving Right to Work and the use of agencies for temporary labour
- Health and Safety - Further development of Health and Safety Awareness Training
- Whistle Blowing Line available to all workers – We maintain a line that can be used for both employees and a proportion of our farming community. During the year we will send out new communication around this to raise awareness again and extend this initiative with our farming community.

This has been sent out to 616 farm businesses. After the initial result the % of farms that were either high or medium risk was 9.5 % after follow up and action plans were put in place, high risk was eliminated and medium risk was 0.4%.



### **Temporary Labour Agencies**

We have reduced the number of agencies that we use across our sites and have a clear SLA with the remaining businesses. Our HR team carry out regular audits of their processes and procedures to ensure that they are carrying out their requirements under the Modern Slavery Act.

We are also in the process of rolling out a new clause in our GNFR (Goods Not for Retail Suppliers) such as laundry services and security, where they are carried out by 3<sup>rd</sup> parties and not under our direct control. We have developed an audit tool to be used to check their processes and procedures and if they are based on site we expect them to fully comply with any SMETA audits we may be subject to or other customer's audits as required. We will continue to amend our supplier agreements as contracts are due for renewal to ensure we cover all areas of our spending outside of ingredients and packaging. We are also working with other suppliers and retailers to develop specific relevant guidance within the SEDEX system.

### **Transport & Logistics**

As one of our high risk areas we have worked to develop a transport and logistics specific SAQ which we will roll out across all our suppliers early this year. We will use the results of this to prioritise the areas of work for the remainder of the year.

We are also working through the SEDEX Stakeholders Forum to develop guidance for GNFR (Goods Not for Resale) areas with a view to embedding SEDEX within these areas.





### **Suppliers within our supply chain**

During the year we have now fully mapped our supply chain where possible to tier 2 and 3. We have also strengthened our new supplier on boarding with a more robust risk assessment process prior to any business being undertaken.

We are also proud to be working with 26 suppliers and 6 retail customers as part of the Food Industry Network for Ethical Trade. This is a supplier led initiative to drive up standards in human rights in supply chains that are acceptable for all customers. This allows us to pool and concentrate our resources so we can use our combined leverage within supply chains for a positive outcome. The group has further developed a risk assessment tool which we are using alongside our existing risk assessment methodology to give a deeper assessment with a human rights priority.

As part of this group there are 3 work streams and a number of working groups concentrating on the highest risk areas. The 3 work streams are:

- Risk Assessment – Development and review of the risk assessment tool.
- Collaboration working groups – Modern Slavery, Seasonal Labour Recruitment, Labour Agency Management, Transport and Logistics, Spices Working Group, Thailand Working Group and Horizon Scanning Group
- Supplier Engagement Within Supply Chains

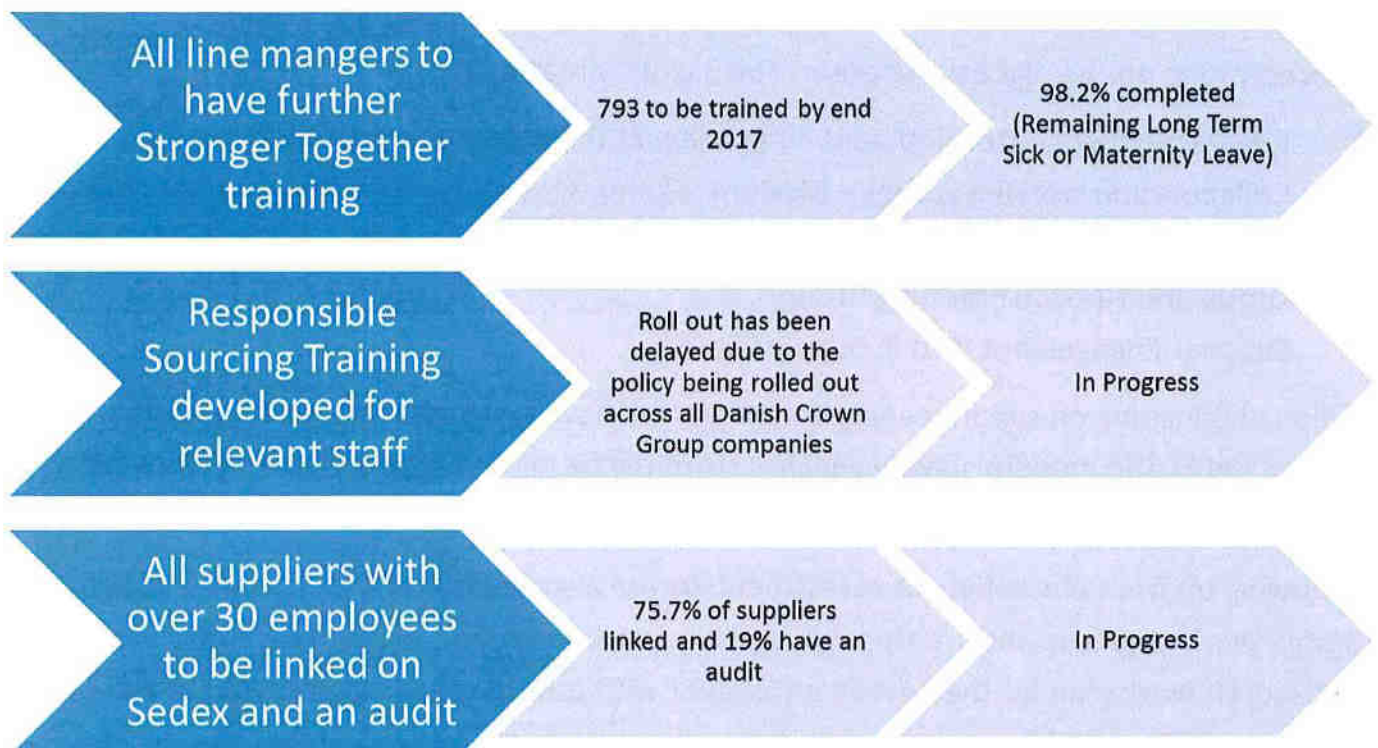
Tulip Ltd is leading on supplier engagement and we have developed an initial introduction to human rights and modern slavery which is currently be piloted with suppliers before being rolled out by all members.

Following on from our initial risk assessment we are also working in the Modern Slavery, Spices Working Group and Transport & Logistics working groups. These have developed an initial draft work plan for the next year together with priorities and agreed ways of working.

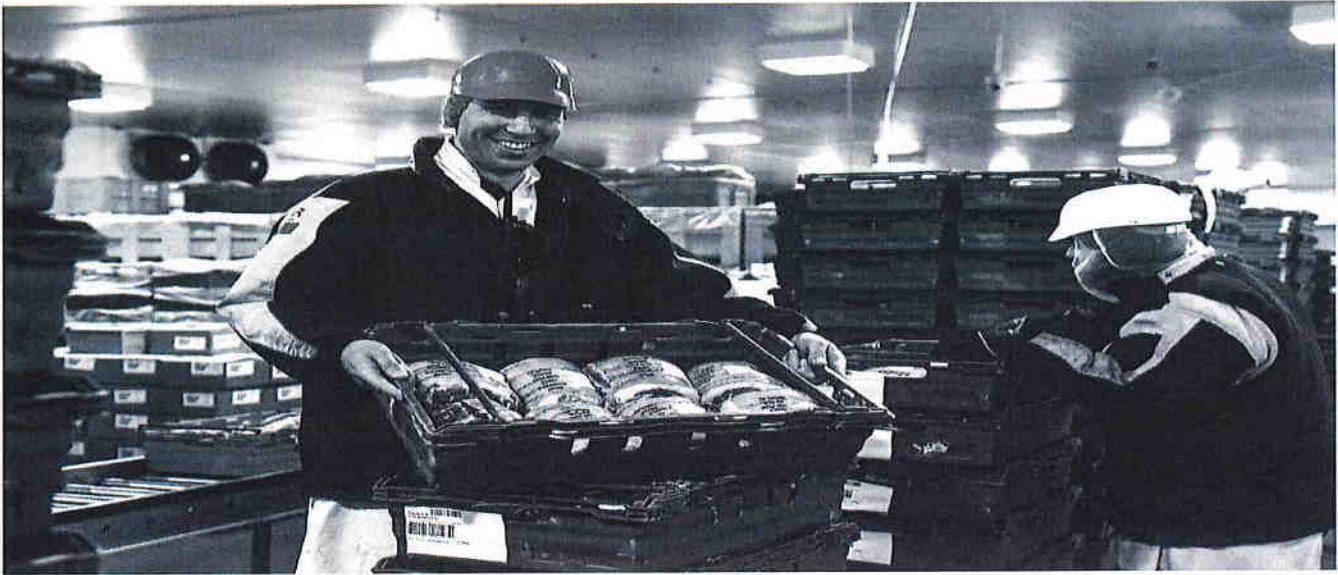
We are also in the process of launching our Responsible Sourcing Policy across the Danish Crown Group, this will enable us to work with consistency across all our suppliers and incorporate this as part of our standard supplier agreements. We will support the other companies within the Danish Crown Group in this roll out so our policies and goals are aligned.



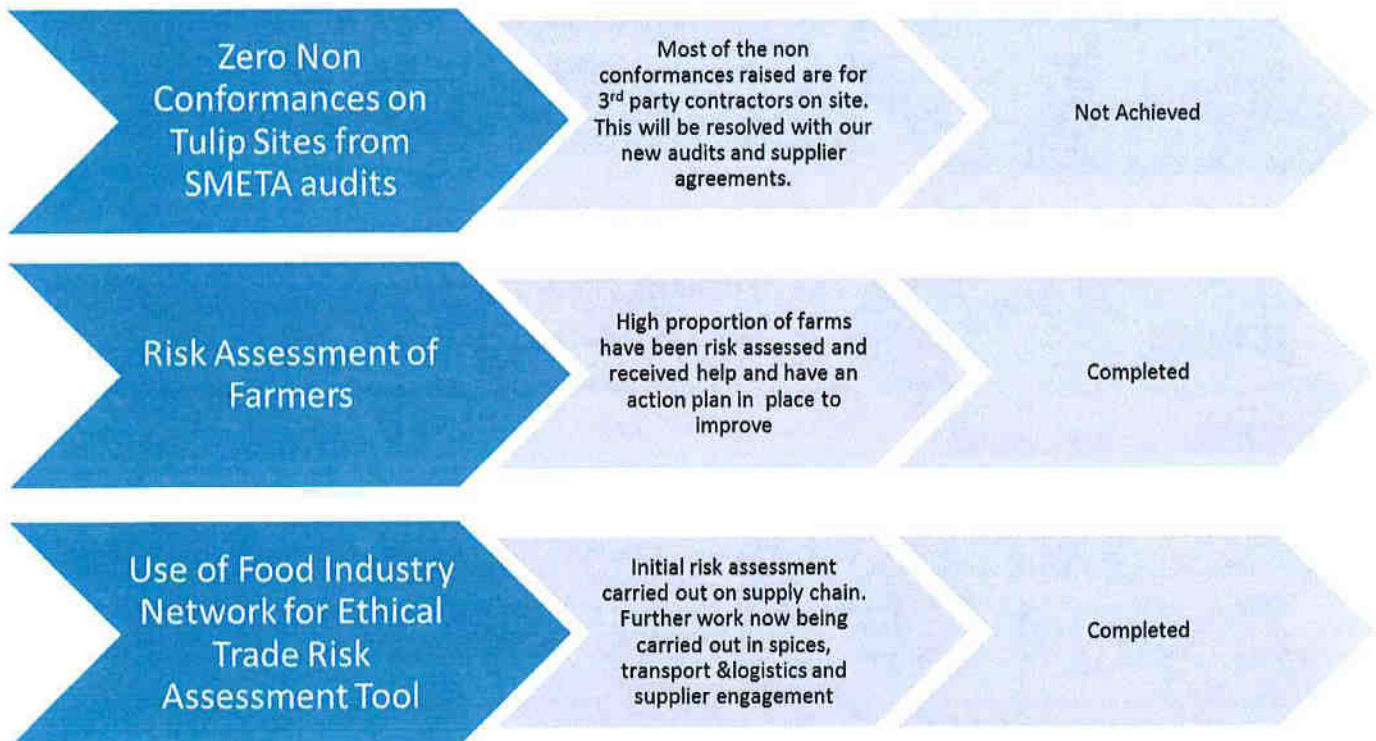
## Progress from last years statement





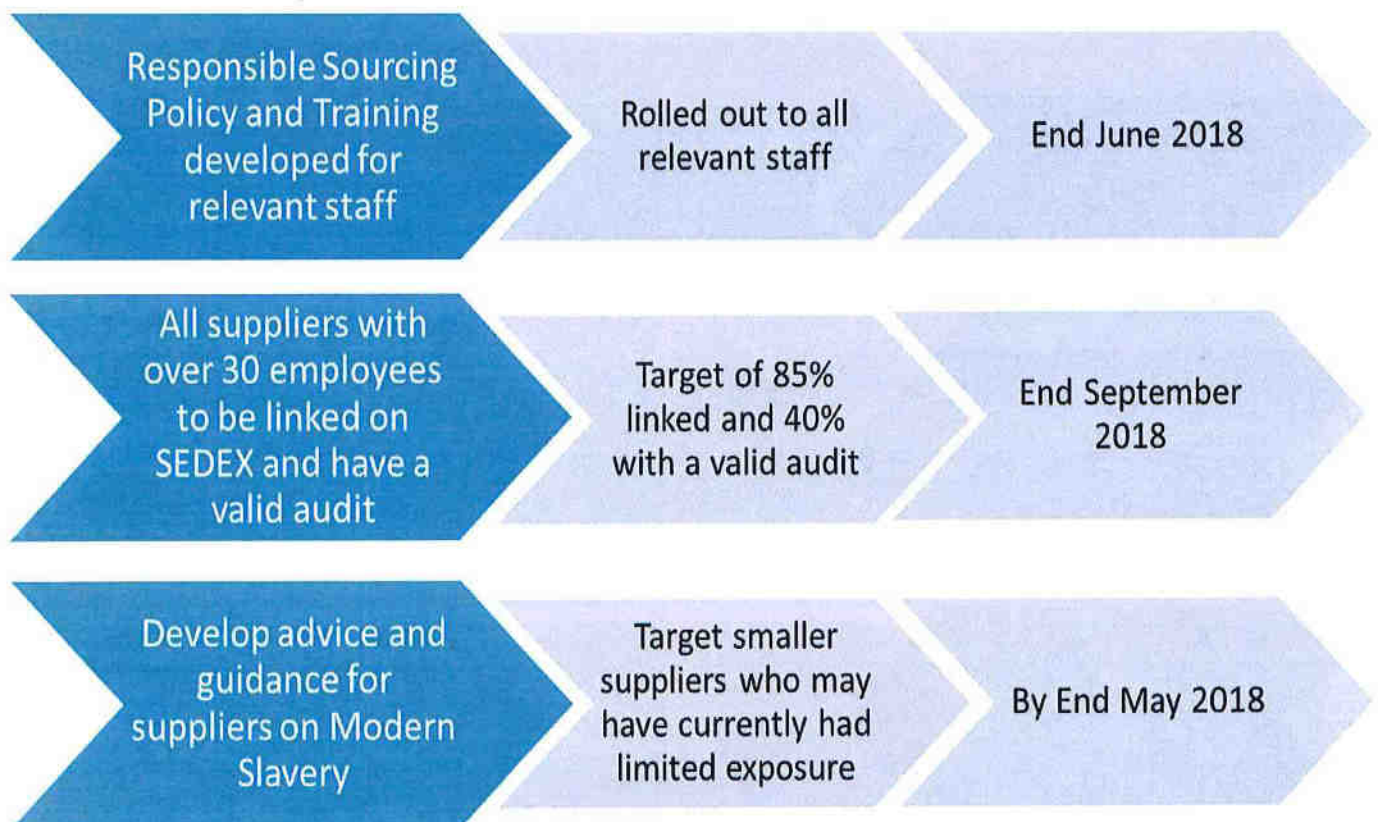


## Progress from last years statement





## Targets for current year







## Targets for current year

3<sup>rd</sup> Party  
Supplier audits  
carried out on  
all sites

Standards developed and  
action plans agreed where  
required

By End April 2018

Farm  
improvements

Further awareness raising  
and training provided to our  
farmers on Responsible  
Recruitment, Health & Safety  
and relaunch of Whistle  
Blowing Line

By End Sept 2018



## Board Member Approval

This statement has been approved by the CEO of Tulip Ltd on behalf of the Board of Directors and will be subject to review annually.

**CEO Signature**

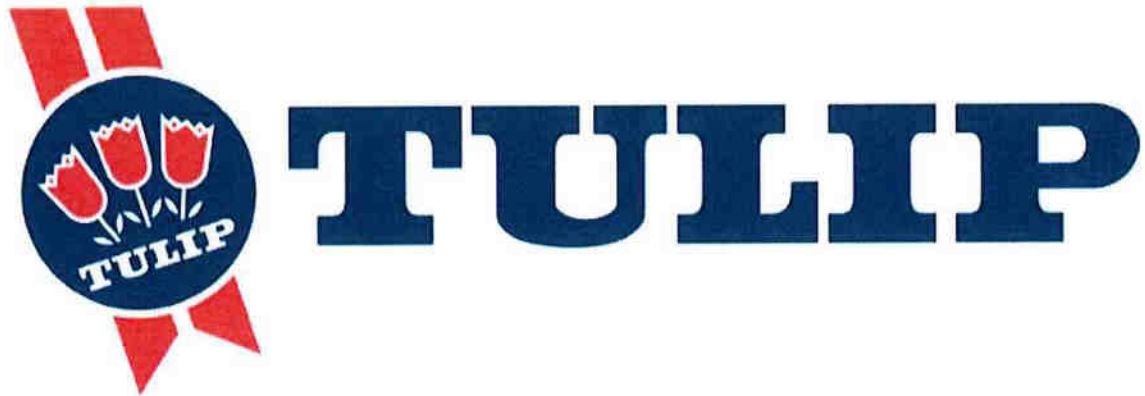
**CEO Name**

STEVE FRANCIS

**DATE**

28/2/2018





Valid for: Tulip Ltd and subsidiaries

Owner: Andy York, Responsible Sourcing Manager

Approved: Group HR VP

Document type: Modern Slavery Statement

Reference: Modern Slavery Act 2015

Approval date: January 2018

Controlled: Uncontrolled If Printed, Confidential for the use of Tulip Ltd and Tulip Ltd suppliers only

Version: 2.00

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.





## Mandate – Modern Slavery Statement and Information Document

Name of document	<ul style="list-style-type: none"> <li>Modern Slavery Statement and Information Document</li> </ul>
Why is the document required?	<ul style="list-style-type: none"> <li>Legal requirement for an annual update on progress in the area of Modern Slavery under the Modern Slavery Act 2015</li> <li>Also required to illustrate to all stakeholders the work we are doing in this area.</li> <li>Required to prove due diligence for SEDEX/SMETA audits and customers audits as required</li> </ul>
Why is an update required?	<ul style="list-style-type: none"> <li>Annual requirement under the terms of the Modern Slavery Act 2015</li> </ul>
What changes have been made to the previous version?	<ul style="list-style-type: none"> <li>Updated with information and work undertaking in the last year and setting of targets for the following year.</li> </ul>
Are we in full compliance with the policy statement?	<ul style="list-style-type: none"> <li>The statement will ensure we are compliant with the terms of the Modern Slavery Act 2015.</li> <li>The policy will also help to ensure we are clear and transparent with our business and also to customers and wider supply chain.</li> </ul>
Where will this document be published?	<ul style="list-style-type: none"> <li>This statement will be displayed on our corporate website as the current one, linked from the bottom of the homepage</li> <li>This statement will be sent to all site HR Teams to display on site</li> <li>This statement will be sent to key customers</li> </ul>

Prepared by:	Andy York
Approved by:	Andy Wright, Scythia Cross and Rachel Baldwin and divisional MD's





## Delivering on responsible sourcing across Tulip

Tulip's Modern Slavery Statement covering 1<sup>st</sup> October 2016 to 30<sup>th</sup> September 2017 is now available for viewing on Tulip's internet.

The report shows that progress has been made in a number of areas:

- A risk assessment tool has now been rolled out across a number of our farms, including pig and sheep farms. This has enabled us to better identify any potential ethical issues and to have a better understanding of the main issues within our farming supply chain. Our action plan now includes responsible recruitment, further developments in the health and safety area and an extended whistle blowing facility;
- The number of employment agencies that we use across our sites has been reduced;
- We are in the process of rolling out a new clause in our GNFR (Goods Not For Retail) suppliers, e.g. laundry services and security, which are carried out by third parties. This will involve an audit tool to be used to check their processes and procedures;
- A transport and logistics specific SAQ will be rolled out across all our suppliers this year;
- We have now fully mapped our supply chain where possible to Tier 2 and 3. We have also strengthened our new supplier 'on boarding' with a more robust risk assessment process prior to any business being undertaken;
- We are in the process of launching our Responsible Sourcing Policy across the Danish Crown Group to enable us to work consistently across our suppliers and incorporate this as part of our standard supplier agreements.

There are five main targets for 2018:

- A responsible sourcing policy and training will be developed for all relevant staff – to be completed by the end of June 2018
- All suppliers with over 30 employees will be linked on SEDEX and have a valid audit. We aim to have 85% linked and 40% with a valid audit. This will be completed by the end of September 2018
- Development of advice and guidance on Modern Slavery for suppliers. In this respect, we are targeting smaller suppliers who have only have had limited exposure. This will be completed by the end of May 2018.
- Third party supplier audits to be carried out at all sites – by end April 2018.
- Farm improvements (as listed above) to be fully implemented by the end of September 2018.

"Over the past year, we have made significant progress on our supplier engagement. Moreover, our risk assessment procedures are becoming increasingly robust," says Andy York, Responsible Sourcing Manager. "One exciting initiative we are currently working on with the Co-op is the Bright Futures programme, which helps victims of Modern Slavery into paid employment, which supports victims in rebuilding their lives."

*By law, any company that does more than £36 million business per year is obliged to report on what actions they are taking to prevent slavery and human trafficking. As a major food manufacturer, Tulip has a strong reliance on temporary agency labour – as have other organisations within our supply chain – and we have a responsibility to ensure that we and our suppliers comply with the regulations of the Modern Slavery Act of 2015.*

