ANTI-SLAVERY STATEMENT

Introduction

Südzucker UK Ltd are committed to ensuring that there is no modern slavery or human trafficking within our corporate activities. All potential modern slavery risks related to our business have been evaluated and steps put in place to enforce an effective transparent system.

Organizational structure and supply chains

Südzucker UK Ltd are market-leading distributors of sugar-based Speciality products primarily for the bakery, confectionery and dessert manufacturing industries, supplying to major manufacturers and wholesalers and also the sale and distribution of sugar throughout the UK & IE.

Our supply chains are predominantly based in Europe, we require all of our suppliers and partners to comply in full with the Modern Slavery Act 2015 and meet our values.

Policies, standards and practices

We operate the following policies that detail our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Training** – Staff will be made aware of the requirements of the Modern Slavery Act 2015 through the site induction programme. Supply chain management, site management and HR personnel to complete training on modern –anti-slavery.

- **Awareness Programme – All 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 parties within the organisation; and what external help is available

- **Employee code of conduct** – Our code of conduct policy will be updated to make it clear to employees the actions and behavior expected of them when representing the business; the highest standards of employee conduct and ethical behavior including the management of the supply chain is of paramount importance.

- **Recruitment/Agency workers policy** – Südzucker UK Ltd uses only specified, reputable employment agencies to source labour and always verifies and approves their practices.

- **Supplier/Procurement Code of Conduct** – We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code. Serious violations of Südzucker UK Ltd Supplier Code of Conduct and non-
compliance with the Modern Slavery Act 2015 will lead to the termination of the business relationship.

- **Reporting Concerns** – We encourage all our 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.

**Due Diligence**

Südzucker UK Ltd recognizes that the principal exposure to Modern Slavery is within the supply chain, we undertake due diligence when considering new suppliers, and review our existing suppliers.

Reviews include:

- Assessing and reviewing the supply chain to consider their particular product and or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments through questionnaires, which will incorporate compliance with the Modern Slavery Act 2015
- Investigating the ethical supplier database where suppliers can be checked for their labour standards and compliance in general, or check any current or new suppliers who have published their Statement on the following website [https://business-humanrights.org/en/uk-modern-slavery-act-registry](https://business-humanrights.org/en/uk-modern-slavery-act-registry)

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes Südzucker UK Ltd Slavery and Human Trafficking Statement for the foreseeable future.

**Approval**

This statement has been approved by the Managing Director, who will review and update as required.

Ross Ferguson  
Managing Director  
Südzucker UK Ltd  
Date 25/4/19

Douglas McCabe  
Director of Sales & Customer Service  
Südzucker UK Ltd  
Date 25/4/19