



Modern Slavery Statement 2023



This statement is being published in accordance with the Modern Slavery Act 2015.

It sets out the steps taken by Westbridge Food Group Ltd during the year ending 31st December 2023 to prevent modern slavery and human trafficking in their business and supply chains.

This is the 8th Modern Slavery statement for the combined UK business that covers Westbridge Foods Ltd, CP Foods UK Ltd and all their subsidiaries.

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INTRODUCTION

Westbridge Food Group, and our subsidiaries, are committed to preventing Modern Slavery, Forced Labour and Human Trafficking in our business and our supply chains.

This statement is made in pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that we have taken during the year ending 31 December 2023, and continue to take, to prevent modern slavery and human trafficking in its business and supply chain.

2023 saw new global challenges with a new war in Europe, crisis in the Middle East and the effects of climate change were being felt more than ever. These global issues created new opportunities for illegal operators to take advantage of vulnerable people who have been displaced due to conflict, political unrest and with the severe weather patterns that are becoming more regular. The opportunity of a better and more stable life is what the illegal operators are promising and as we are aware, this is not always the case and often people are getting trapped in forced and bonded labour.

During 2023, we enhanced our programme of awareness within our own operations and shared the tools for our employees to spot the signs within their own communities. We continued to enhance our policies and practices to protect vulnerable workers within our supply chains, including working with our key suppliers on embedding a Responsible Recruitment programme to work towards a recruitment journey where no fees are paid by the worker to obtain work.

We remained reliant on our collaboration with industry groups, to enable us to continue to raise awareness of Modern Slavery through a common approach identifying, addressing, and managing the risks of Human Rights abuses of workers in our businesses and our global supply chains.

This statement has been approved by the Board of Directors of Westbridge Foods Group Ltd and will be reviewed annually.



Nick Shaw, Managing Director,
Westbridge Food Group Ltd – July 2024

OUR BUSINESS

Westbridge Food Group is a global business, supplying products to the leading retailers, brands, manufacturers, and the foodservice sector. We are an importer, manufacturer, and supplier of chilled and frozen food products to businesses in the UK and the EU with an export division supplying companies in Asia and Australia with products from the UK, EU, Asia and South America.

With an annual turnover of £669 Million we employ approximately 260 people, both directly employed and agency workers, across our global operations. Our head office is based in Worcestershire, UK, with a manufacturing operation in Suffolk, UK, with 3 global teams based in offices in Thailand, Poland and China.

Our product range consists of cooked and raw poultry, seafood, party food, ready to eat composite and plant based products which are imported from Asia, South America, and the EU.



Westbridge Foods Group Ltd is a wholly owned subsidiary of Charoen Pokphand Foods Public Company Limited (“CPF”) one of the world’s leading listed agro-industrial and food conglomerates, which operates a completely vertically integrated business and employs more than 135,000 people globally. With net annual sales of 585,844 million Thai Baht in 2023, CPF operates in both the livestock and aquaculture businesses and incorporates animal feed, animal breeding and farming, food manufacturing and processing, food retailing and restaurant businesses with operations in 17 countries and exporting to more than 50 countries across 5 continents.



<https://www.cpfworldwide.com/en/home>

POLICY & PRACTICE

As a business we will not tolerate the abuse of human rights within any part of our business, or our supply chains and we take any allegations that human rights have not been properly respected very seriously.

We actively recognise the importance of our participation in combatting modern slavery in our business and supply chains and have specific policies setting out our requirements for our suppliers and operations to adhere to.

PREVENTING HIDDEN LABOUR EXPLOITATION POLICY

Our global sourcing principles on modern slavery have been strengthened by adding this policy, prohibiting the payment of direct or indirect illegal recruitment fees to secure a job. This policy outlines our commitment as a business to limit the risks of modern slavery.

ANTI-MODERN SLAVERY & ETHICAL TRADE INITIATIVE (ETI) POLICY

Based on the Ethical Trading Initiative (ETI) Base code which states that employment must be freely chosen, with no forced, bonded, or involuntary labour. All suppliers and subcontractors who are not already bound by ETI requirements through ETI or SEDEX Membership are required to adhere to this policy.

POLICIES PROTECTING OUR EMPLOYEES:

- Recruitment and Selection Policy
- Grievance Policy and Procedure
- Whistleblowing Policy
- Equal Opportunities Policy
- Dignity at work Policy

The company whistleblowing line has been in operation for 6 years, aimed primarily for our workers in the UK to raise concerns for themselves and other colleagues, in 2023 this was rolled out to all our employees in our global offices.

BUSINESS ETHICS

- Gifts & Hospitality Policy
- Anti-bribery Policy

We appreciate that this area is complex and as our global supply chains increase, our continuous efforts will ensure that our policies are adapted to include all new high risk and medium risk suppliers. We work closely with our procurement and buying teams to raise awareness of our policies to ensure that suppliers are fully compliant.

Our commitment is to ensure that our policies are available to all employees at all sites through the most appropriate communication platforms and training is given to ensure awareness of the policies both internally and within our supply chains.

The policies are reviewed annually to ensure that they remain relevant to effectively highlight and address the challenges we face.

All our policies are available on request to ESG@westbridgefoods.com

TRAINING & CAPACITY BUILDING

Our employees play an important role in helping us to ensure modern slavery abuses do not take place in our business or our supply chain. We inform and train our employees to ensure they can spot the signs of modern day slavery and share with them the tools available and actively encourage them to report such abuses.

Following the introduction of Modern Slavery Champions in the previous year, during 2023, they were involved in organising many events and campaigns, across the business.

This included themed events to gain staff engagement, such as Friendship Day and Grocery Aid Day. During the events, Champions are able to share with employees updates and information on modern slavery awareness, as well as how to access support and guidance.

TRAINING

- Director, Executive Team, Procurement, Commercial and Buyer Training delivered by FNET
- Stronger2gether training on tackling Modern Slavery in UK Business and Global Supply Chains training undertaken by Responsible Sourcing Team.
- Responsible Sourcing Manager completed ETI Human Rights Due Diligence training in 2018 and completed Social Compliance Lead Auditor Qualification in January 2019.
- Factory Managers and Supervisors undertook specific awareness training carried out by an external expert into how to spot the signs and support potential victims.
- All new employees, including agency workers, go through Modern Slavery awareness training which includes material and videos produced by Stronger2gether during their initial induction
- All new “at risk” employees based at our manufacturing site have received awareness training.
- All current employees have received Modern Slavery Awareness training and how to report suspected abuses.
- Stronger2gether training on tackling Modern Slavery in UK Business and Global Supply Chains training undertaken by Responsible Sourcing Team.
- Regular participation in Human Rights, Modern Slavery, and industry specific training by the Responsible Sourcing Team.

AWARENESS

- How to spot the signs of modern slavery included in all new employee inductions
- Poster campaign, refreshed annually, displayed across all sites in the UK on how to spot the signs of potential victims.
- Whistleblowing posters across all sites.
- Regular participation in specific ethical conferences including SEDEX, Stronger2gether, Seafish, FNET
- Quarterly Modern Slavery awareness e-newsletter to all employees.

MODERN SLAVERY CHAMPION EVENTS

- **Grocery Aid Day;** creating awareness that all employees working in the FMCG sector have access to great advice and assistance with the Grocery Aid charity. We incorporated into the day information about the companies Modern Slavery Statement and shared a reminder of the Spotting the Signs awareness.
- **UK Friendship Day;** theme to honour the importance of friendship, looking out for our colleagues and helping our local community. Staff came together to enjoy ice-creams and chat to each other, discussing the importance of friendship and looking out for those around you who are vulnerable. During the session we shared MS awareness information and support networks for mental health.
- **Anti-Modern Slavery Day;** shared details of what our company does and how we address modern slavery in our business and our supply chains, to ensure we have sustainable ethical supply chains.

RISK ASSESSMENT

Our supply chains are global and often complex and during 2023, we continued to work with our suppliers to gain better visibility of the end-to-end supply chain. Our risk assessment process involves an annual assessment of all our suppliers and supply chains. Our approach to has been developed and evolved over a number of years as the complexity of our supply chains as become more and more visible.

To understand the modern slavery and human trafficking risks associated with the country our supply chains operate in, we use several tools to ensure that the highest risks and impacts to the business are identified and an appropriate due diligence is put in place that can bring the most benefit.

The tools we use include the Food Network for Ethical Trade (FNET) risk assessment which combines published reports such as the Global Slavery Index, the US Trafficking in Persons (TIP) Report, the ITUC Global Rights Index, publicly available media reports and with input from retailers, suppliers and human rights experts, to give an overall risk rating by country. We also utilise data from the SEDEX system; the country risk metrics, the RADAR Risk Assessment tool, along with the individual supplier's data from the SEDEX SAQ and SMETA audit results.

Using all this data together we are able to focus our attention onto those supply chains, industries or countries of operation where the risk is highest.

DUE DILIGENCE

Having carried out a risk assessment and identifying our priority risks, it is important this is followed by adequate due diligence to identify issues that may indicate modern slavery. We have extensive supply chains in high-risk countries, and this is where our efforts have been focussed.

We require all our food and packaging raw material suppliers to be SEDEX members and complete the SEDEX SAQ at least annually, and for those suppliers in high-risk countries to have a Semi-announced SMETA audit either bi-annually or annually as a minimum.

Where our upstream supply chains (e.g., Farms, Hatcheries, Feed Mills), have been identified as high-risk, we will work with those supply chains to encourage them to join the SEDEX system and where required to complete SMETA audits. Where those supply chains are vast, we will ask for SMETA audits to be completed on a sample basis.



We recognise the importance of audits in providing a snapshot of working conditions in our supply chains but also understand their limitations. Therefore, as we continue to use these audits, we strengthen their function by ensuring the audit data is reviewed alongside the outcomes from worker interviews (carried out anonymously by a random selection of site personnel). Working closely with NGO's they can offer additional worker interviews off site and in the community setting, away from the workplace.

Where we see rising risks or new risks evolving in a particular market or industry, or if we believe certain risks might not be identified through audit, we would consider working with a third-party independent company to carry out further in-depth human rights due diligence review of that supply chain.

Our anti-modern slavery and ethical trading policy requires suppliers to have an effective grievance mechanism in addition to a Whistleblowing or Labour hotline. Any issues highlighted are reported in our KPI's. In severe cases there is a framework in place to remedy vulnerable or at-risk workers, whether that be in the UK through local charities or GLAA, or in Asia through on the ground NGO's such as Labor Rights Promotions Network (LPN).

We recognise that there will be risks and vulnerabilities in our supply chains and our efforts to identify, act and remedy will ensure we have sustainable ethical supply chains.

PRIORITY RISKS

Following the completion of our risk assessment in 2023, we identified a number of priority areas within our business and supply chains where we wanted to focus our attention for the year. Identifying these risks has not detracted from the work we have already committed to previously but has ensured that we look for ways to manage and address the risks.

XINJIANG SOURCING

- Continued to ban sourcing raw materials from the Xinjiang Autonomous region due to the risks of forced labour in the region
- Increased due diligence on all products sourced from China due to the potential risk of forced labour through state imposed labour transfer programmes.
- Actively participated in a number of collaborative meetings with key stakeholders and NGO groups to address the challenges and media speculation
- Joined the Seafood Ethics Alliance to participate in collaboration with our UK fish & seafood businesses

RECRUITMENT FEES

- Continued to work with our suppliers in Thailand to understand the companies recruitment programmes and to map the recruitment journey for migrant workers
 - Carried out detailed review of our suppliers in our high-risk sourcing countries to understand their recruitment policies
 - Mapped out the recruitment fees paid by migrant workers from source countries
- Worked with key suppliers to enhance recruitment programmes to cover the costs of passport fees for migrant labour (on top of all fees paid from job offer); suppliers agreed to implemented from 1st January 2024.

UK AGENCY WORKERS

- Improved the right to work checks on all employees including agency workers.
- Rolled out additional modern slavery awareness training to all own employees and agency workers
- Updated the modern slavery awareness posters across the sites

UK LABOUR AGENCIES











- Continued to enhance the due diligence carried out on our UK labour agencies
- Annual assessment led to one approved agency being delisted

GOODS NOT FOR RESALE (GNFR): UK TRANSPORT & DISTRIBUTION

- Mapped out the transport & distribution companies used in our supply chains
- Started engaging with our T&D suppliers
- Worked collaboratively with the FNET subgroup on Service Providers/ GNFR
- Encouraged T&D suppliers to become members of SEDEX and complete the SAQ

PARTNERSHIP & COLLABORATIONS

Whilst we continued to work in collaboration with our longstanding partners, in 2023 we joined the Seafood Ethics Action Alliance (SEA Alliance), to gain a better understanding of the human rights challenges in the global seafood industry.

	<p>The Seafood Ethics Action Alliance (SEA Alliance) is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain and ensure respect for human rights.</p> <p>https://seaa.org/</p>
	<p>The Food Network for Ethical Trade (FNET) was established in 2016 by several major UK food companies to improve human rights in global food supply chains through a common approach to managing ethical trade. We aim to support members to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and to build a forum for sharing issues and best practice.</p> <p>https://foodnetworkforethicaltrade.com</p>
	<p>The Seafood Task Force is a unique collaboration for the seafood industry tackling critical sustainability and ethical issues in the Thailand seafood industry sector. Building practical tools, resources, and a network of like-minded organisations across the seafood supply chain, to help solve these critical issues together. https://www.seafoodtaskforce.global</p>
	<p>Social responsibility is paramount to Seafish and to the entire seafood industry. For us social responsibility encompasses concerns about labour and human rights issues. This includes human trafficking, labour abuses, child labour, debt bondage, forced labour, migrant workers, and slavery, across the whole supply chain.</p> <p>https://www.seafish.org/article/ethics-in-seafood</p>
	<p>Stronger Together is a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking, and other hidden third-party exploitation of workers. We provide guidance, training, resources and a network for employers, labour providers, workers, and their representatives to work together to reduce exploitation.</p> <p>https://www.stronger2gether.org</p>
	<p>Sedex is a global membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. Our collaborative approach helps buyers and suppliers to share and exchange data, helping to better manage social and environmental risks within their supply chain, and positively impact responsible sourcing.</p> <p>https://www.sedexglobal.com</p>
	<p>The Labour Protection Network* was formed to improve the lives of migrant labourers in Thailand by addressing the injustice brought on by discrimination and inequality. Only LPN has the courage to orchestrate life-saving rescues in the near term and the strategic focus to inoculate communities against human rights abuse in the long term.</p> <p>https://www.lpnfoundation.org</p>
	<p>Established in 2004 at the instigation of the UK government, ALP is a specialist trade association promoting responsible recruitment and good practice for organisations that supply the workforce to the food processing, agricultural and wider consumer goods supply chain. The ALP influences government and regulatory policy and provides a range of very useful information and services to its members. The ALP's mission is for "UK labour provision to be recognised as a model of global good practice" achieved through six policy focus areas:</p> <p>https://labourproviders.org.uk/</p>
	<p>The Responsible Recruitment Toolkit (RRT) is a not-for-profit, global programme whose mission is to drive ethical and professional recruitment and labour supply that's good workers, recruiters, and clients. They offer an unparalleled toolkit to help businesses achieve and be recognised for responsible recruitment.</p> <p>https://responsiblerecruitmenttoolkit.org/</p>
	<p>Whistleblowing hotline solutions for organizations of all sizes</p> <p>NAVEX's whistleblowing hotline services provide employees, customers, and suppliers with a safe place to speak up about workplace concerns. Whether for simple or complex organization structures, our reporting system provides the ethics and compliance data you need to inform your program, helping you to spot trends and take corrective action before minor issues become critical.</p> <p>https://www.navex.com/en-us/products/navex-ethics-compliance/hotline-reporting-and-intake/</p>

TRACKING PROGRESS

To demonstrate our progress in addressing modern slavery risks, we use key performance indicators (KPIs) to measure our performance and to set progress goals for our next statement.

Measures	Progress
100% of own UK based employees undertake Modern Slavery awareness	100%
100% UK based Labour Agencies assessed annually	100%
100% high risk suppliers visible on SEDEX	100%
100% high risk suppliers receive social compliance audit (annually, where required)	100%
Number of calls to whistleblowing line	0
Number of Modern Slavery Incidents Reported	0
Number of Modern Slavery Incidents Investigated	0
Number of Modern Slavery Incidents Conformed	0

LOOKING AHEAD TO 2024

We understand that the issue of Modern Slavery and Human Trafficking is a global issue and that we will not be able to tackle this without being open and transparent about the challenges we find in our business and our supply chains.

We will continue to evolve our awareness programme and to continually review our policy and processes to ensure they remain fit for purpose in this ever changing landscape. The perpetrators of these heinous crimes are always changing and looking for new ways to continue exploitation and whilst we have to react to those changes, we must remain vigilant and try and mitigate the risks before they happen.

As in previous years, we will continue to report on the work that we do through the publication of the annual modern slavery statement.

Some key plans for 2024 -

- **Carry out an independent 3rd party assessment of our human rights and modern slavery strategy**
- **Increase visibility across all our high risk supply chains beyond tier 1**
- **Roll out SEDEX across key high risk supply chains beyond tier 1**
- **Engage with our key high risk GNFR suppliers on this topic**
- **Continue to engage with our collaborative partners on new and emerging risks**



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