

ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to s4 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that Bread Holdings Limited (BHL) and its relevant UK subsidiaries and group companies have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

The relevant UK subsidiaries are The Bread Factory (TBF) and GAIL’s bakeries.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Bread Holdings Ltd is committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or supply chain.

This statement relates to actions and activities during the financial year 1st March 2019 – 29th February 2020.

The publication of this Statement as a result of COVID-19 pressures due to a reduction in staff capacity and availability to collate the information.

OUR BUSINESS

Bread Holdings Limited is a manufacturer and retailer in the food industry. Our registered office is Unit 12 Garrick Road Industrial Estate, Irving Way, London NW9 6AQ. At this address TBF produces and bakes bread, cakes and pastries for wholesale customers. We have 654 employees based at our sites in Hendon and St Albans.

GAIL’s Bakeries has 65 sites across London, Oxford, Brighton, Hove, Wokingham, Farnham, Guildford and Windsor.

As such, BHL has an extensive supply chain and we procure goods and services in excess of £20 million per year. We work with a wide range of different suppliers, subcontractors and partners each of which will have their own subcontractors, affiliates and associate entities. Bread Holdings Limited therefore is connected to multiple entities across Europe (though mainly the UK) through numerous contractual relationships.

OUR POLICIES

At GAIL’s bakery we operate several internal policies to ensure that we conduct business in an ethical and transparent manner. These policies are available to our teams via our online E-learning platform and include:

- Whistleblowing policy
- Recruitment and selection policy

- Equality policy
- Anti-Slavery and human trafficking policy
- Anti-Bribery and Corruption

At TBF we rolled out the following policies to our teams:

- Anti Bribery and Corruption
- Recruitment & Selection policy
- Whistleblowing
- Equal Opportunities & Dignity at Work
- Ethical Trading Code of Practice

Across BHL we have controls in place to ensure that all employees are assessed for their right to work and our wages and benefits comply with the relevant government legislation.

OUR SUPPLIERS

TBF operates a supplier policy and maintains a preferred supplier list. We are working towards understanding our supply chain and developing the appropriate policies.

This will include ensuring that a supplier has not been convicted of an offence relating to modern slavery, is taking steps to comply with the Modern Slavery Act 2015 and that they hold their own suppliers to account over modern slavery.

TRAINING AND AWARENESS

During the year (March 2019 – February 2020) at TBF we have:

- Re trained our management team to recognise the signs of modern slavery
- Ensured that the relevant people in our HR team attended either the Stronger Together workshop or the Stronger Together Responsible Sourcing training
- Added a specific section to our Welcome Day (New starter induction) to raise awareness of Modern Slavery
- Displayed posters across the Hendon site with support information to raise awareness to our employees

Our focus for the next year will be to ensure:


- All members of the Procurement Team will be trained in order to identify risks or potential risks within our supply chain
- That our new supplier self assessment questionnaire will include a section on Modern Day Slavery

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified. However where they are reported we will engage with the appropriate agencies to ensure the matter is investigated.
- That our suppliers and partners themselves clearly state their own adherence to the standards that we at BHL have outlined here

This statement is a combined statement for BHL and its UK subsidiary companies and was approved by the Board of BHL.

Dean Arbel 
Group MD
December 2020