

## **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 1<sup>st</sup> March 2022 – 28<sup>th</sup> February 2023

### **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 925 employees based at our sites in Hendon, St Albans, Manchester and Bath

GAIL’s Bakeries has 80 sites across London and the Home Counties and currently has 1600 employees

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 the online E-learning platform along with the relevant training to all managers. These include

- Whistleblowing policy
- Recruitment and selection policy
- Equality Policy
- Anti Bribery and Corruption
- Anti – Slavery and Human Trafficking

Across TBF there are a number of internal policies to ensure we operate in an ethical manner. These are cascaded to all new team members and trained into our managers. These include:

- Equal Opportunities and Dignity at Work
- Recruitment and Selection Policies
- Whistleblowing
- Anti Bribery and Corruption
- Anti Slavery and Human Trafficking
- Ethical Trading Code of Practice

We are in the process of developing a Human Right Policy and reviewing the above listed policies to ensure they continue to be relevant and fit for purpose.

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 continue working to understanding our supply chain and ensure we continue to develop policies and procedures to prevent Modern Slavery and Human Trafficking. These include the supplier self-assessment questionnaires to monitor compliance.

As a result we are working to ensure 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**

Now recovering from the impacts of Covid 19 on the business which had resulted in limited activity in 2021 our focus for the coming financial year at TBF will be;

- Ensuring every employee is aware of and supports the prevention of Modern Slavery through or training and induction programs
- Re- starting and reinvigorating our Shaping Leaders Program for our managers which includes training and information on Modern Slavery and is delivered to approx. 40 managers.
- Training and supporting the Procurement and Technical teams to identify potential risks within the supply chain.
- Training the group People Teams including the Recruitment Partners to be able to identify the signs and the prevention of Modern Slavery.
- Auditing of all suppliers who provide workers to support the organisation to ensure their compliance with the prevention of Modern 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
- That our suppliers and partners themselves clearly state their own adherence to the standards that we at BHL have outlined here
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This statement is a combined statement for BHL and its UK subsidiary companies and was approved by the Board of BHL.



Mathieu Le Bras  
Managing Director  
The Bread Factory

March 2022