

# Wrights



## MODERN SLAVERY STATEMENT

2020





## Modern Slavery Statement 2020

The UK Modern Slavery Act 2015 requires businesses to report on what actions have been taken to prevent modern slavery in our manufacturing operations and supply chain.

### Introduction

Wrights Food Group is a family owned business, specialising in the manufacture of a wide range of savoury products, sweet bakery and ready meals to many of the UK's Retail and Foodservice trade channels. We employ over 600 staff throughout our retail and manufacturing operations. All staff are directly employed by Wrights and no external agencies are used. We have our own fleet of delivery vehicles, as well as onsite ambient and frozen supply chain facilities.

Wrights have always remained committed to our founding principles of quality, innovation and integrity and believe these values reflect the commitment to ending modern slavery.

### Policies

We are continually committed to reviewing and improving our practices to combat slavery and human trafficking. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships.

We adopt a zero tolerance approach and want to ensure all reasonably practicable steps are taken so that slavery and human trafficking is not present in either our operations or supply chains

### Due Diligence and Risk Assessment

The business has an extensive and complex supply chain and procures a variety of raw materials from the UK and overseas. Although we have long-standing relationships with many of our suppliers, we recognise the role we have in uncovering and eradicating modern slavery and human trafficking for the purpose of labour exploitation. Procurement and technical traceability systems ensure that our products are responsibly sourced from suppliers whose values are aligned with our own.

We aim to purchase ingredients certified to meet the recognised environmental and ethical standards, such as palm oil from producers that meet the Roundtable for Sustainable Palm Oil (RSPO) criteria.

During our supplier approval and review process, Wrights requests that all suppliers are, or become members of SEDEX (Supplier Ethical Data Exchange). Where suppliers are not members of SEDEX, a Supplier Approval Questionnaire is to be completed, which is then assessed, and any risks identified and managed. We have a zero tolerance to non-compliance, and this would result in the supplier being delisted from our approval system. The responsibility of maintaining the supplier approval and review process is held by the Technical Director.

From a supply chain risk point of view, we request that a Supply Chain Vulnerability Questionnaire is completed, which recognises the importance of tracing the raw materials back to a reliable source. This considers type of commodity, seasonality, and country of origin and in turn scored in terms of risk.

## Performance Measures

To assess the impact of the steps we have taken, performance measures will be reviewed regularly for their effectiveness and reported on in future statements.

Last year we reported on the number of suppliers that were registered with SEDEX and aimed to increase this number throughout the year, so their ethical data was visible to us.

Our current data shows this has risen from 79% to 83.5%

We will continue to monitor the number of issues identified and resolved through the risk assessment process and analyse the findings from the Supply Chain Vulnerability Questionnaire to ensure any high risk results are reviewed annually.

We operate a confidential whistleblowing hotline, with the details documented in the Company handbook, printed on individual payslips, as well as notice boards around all sites. We can report that no valid calls have been logged since this was set up.

During the last year we have undertaken an independent 3 day Pillar 2 SMETA audit. The results of this audit are available via our stakeholder relationships on the SEDEX platform. This has enabled the Company to further focus on encouraging staff, customers, and other stakeholders to report any concerns relating to ethical issues within our business.

Further to this we have introduced a Works Committee, with meetings held monthly, to give staff further access and encouragement to report any concerns.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our operations, our Anti-slavery Policy forms part of our induction process for new employees. This policy is displayed at all our manufacturing sites.

Our Technical Director has attended the Stronger Together workshops, with the data shared internally, highlighting the issues around modern slavery.

As part of the SMETA audit the company has been recognised to be following the 9 clauses of the Ethical Trading Initiative Codes of Practice, of which forms the ETI Base Code.

For the coming year, the business has made a financial investment to increase training, which includes the training of personnel in the business on the awareness of modern slavery. The aim is to maintain and improve the outcome of the SMETA audit, as this will be a regular audit requirement for the business.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 4th January 2021.

This statement was approved by the board on 29th June 2021.

Wrights Pies (Shelton) Limited  
Second Avenue  
Weston Road  
Crewe  
Cheshire  
CW1 6XQ

Approved by	Peter Wright
Position	Chairman & CEO
Date	June 2021