



MODERN SLAVERY COMPLIANCE STATEMENT

Introduction

This statement applies to all permanent and temporary employees of Genius Foods Ltd. It also applies to any individual/group associated with Genius or anyone who performs functions in relation to, or for and on behalf of, Genius, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, third-party representatives and business partners.

Purpose and scope of Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We expect the same high standards from all of our contractors, suppliers and other business partners and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude whether adults or children and we expect our suppliers to hold their own suppliers to the same high standards.

Structure and Supply Chains

Genius Foods Ltd is a market leading bakery brand. The company is based in Edinburgh, Scotland with two bakeries in the UK and supported by sales teams around the world.

The company has over 250 permanent employees and is supported by temporary employees and agency usage.

Our supply chain has a global reach and we will mitigate risk in our supply chains by vetting our supply chain policies, contracts and contractors.

Policies on Modern Slavery

The Company is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Genius itself has defined structures and scopes within each department which take on responsibility of assessing the risk of modern slavery within their area. The People Department has an employee handbook supported by policies and procedures to ensure that we comply with all legal requirements. All new employees to Genius Foods Ltd have to prove their right to work in the country in which they are employed and their salaries are paid into a nominated bank account.

We have a Whistleblowing Policy in place and a Confidential Reporting Hotline.

In addition to the People policies and procedures we also have an Ethical Trading Policy which ensures there is no exploitation and that working conditions are acceptable.

All suppliers are checked to see if they are members of Sedex or Qadex. If a supplier is not a

member of Sedex, then an Ethical Trading policy is requested and reviewed.

Due Diligence Processes

Genius use Sedex to assess our own business and those who are in our supply chain to minimise any risk that may arise in relation to Modern Slavery. This is done on an ongoing basis and affects all those departments within Genius who work with our supply chains.

Risk Assessment and Measuring Effectiveness

We have considered the risk of modern slavery in our own business and we have concluded that, on the basis that we are a UK employer subject to UK employment protections and practices and already have well developed checks and balances within our business, we have a low risk of modern slavery occurring in our own operations.

Furthermore, we have in place a policy to protect whistle-blowers who highlight to us any risk of slavery or human trafficking within our business.

The above allows us to continually monitor the effectiveness of our compliance with Modern Slavery requirements as while the risk of this is low; it is audited and all employees have access to a service available 24 hours a day, 7 days a week via a Freephone number to raise any modern slavery concerns.

We will monitor and categorise concerns reported to us either via our Confidential Reporting Hotline or any other channel. Since inception in 2019, no concerns have been reported in relation to modern slavery and/or human trafficking.

We complete at least one audit of labour providers per calendar year while checking the Gangmasters & Labour Abuse Authority public register quarterly. The audits ensure that labour providers follow the same policies as Genius in regards to paying minimum wage and proof of right to work.

Our labour providers themselves have a Modern Slavery Policy and training is completed by their employees to ensure compliance in relation to the Modern Slavery Act 2015.

We have considered the risk of modern slavery occurring in our use of external labour. Labour providers and direct suppliers are audited through Sedex, Qadex and Gangmasters and Labour Abuse Authority. Given the organisations with whom we work have a zero-tolerance approach to modern slavery and the existing checks we apply in these areas, we have concluded that the risks of modern slavery are low.

Employee Training

We are currently reviewing all training opportunities for employees who are impacted by Modern Slavery compliance and in particular those working within the People Department.

The People Department has planned training for the workshop on, "Tackling Modern Slavery in UK Businesses". The training is delivered by "Stronger Together".

Our Modern Slavery Compliance statement is available at all sites and on the company internet. This ensures that all employees/customers/suppliers can easily familiarise themselves with Genius Foods Ltd proactive approach to complying with Modern Slavery requirements.

Monitoring and Review

This policy will be reviewed every two years or when a change in legislation occurs.
The company reserves the right to review, revise, amend or replace the content of this policy at any time to reflect the changing needs of the business or a legislative change.

This statement has been approved by the Genius Foods Ltd Executive team and signed on behalf of the executive team by Heather Crawford, People Manager.

Heather Crawford

Heather Crawford
21st April 2021