



Modern Slavery Policy Statement - 2018

Policy Statement

This statement sets out Dovecote Park's continued action which is aimed at ensuring that there is no slavery or human trafficking within its own business and its supply chain. In this statement we have reinforced our commitment to help eliminate the opportunities for modern slavery to exist. This statement will be updated annually to reiterate our commitment and any action we have taken.

Organisation Structure and Supply Chains

Dovecote Park is a dedicated and privately owned meat processing plant supplying beef, veal and venison to Waitrose Supermarkets. The supply chain extends from the farmer rearing the cattle to ingredients and packaging. The organisation currently operates solely within the United Kingdom (UK), although some of its suppliers are not based in the UK.

High-risk Activities

The company still believes that none of its activities or those of its suppliers are considered to be at a high risk of slavery or human trafficking, although we do continue to monitor these.

Responsibility

Responsibility for the organisation's anti-slavery initiatives are as follows: -

- Policies – The Board of Directors are responsible for the drafting and reviewing of the company's policy on an annual basis.
- Risk Assessments - The Purchasing Manager in conjunction with the Technical Manager will be responsible for ensuring compliance of all suppliers with the exception of Livestock which will be the Responsibility of the Cattle Procurement Manager in conjunction with the HR Manager. They will jointly undertake any investigations and due diligence required to ensure compliance or where there is a suspicion of any breaches under the Modern Slavery Act.
- Training - All senior managers, and the Purchasing Manager have attended training in the Modern Slavery Act. The HR team delivers in-house training and communication to all employees who have any direct / indirect relationship with suppliers. Producers receive training based on the Stronger Together workshops at Producer open days.



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DOVECOTE PARK LIMITED

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REGISTERED IN ENGLAND REGISTERED NO. 3167280



Relevant Policies

Dovecote Park operate strict adherence to the Ethical Trading Initiative Base Code (ETI Base Code). This is founded on the conventions of the International Labour Organisation and is an internationally recognised code of labour practice. The company is also a member of Sedex, the Supplier Ethical Data Exchange which is a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains and monitors adherence of all members against the principles of the ETI Base Code. Dovecote Park require all suppliers (with the exception of Livestock) to be Sedex registered.

The organisation uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency before accepting workers, and continues to carry out periodic audits to ensure continual compliance.

Due Diligence

The organisation will conduct risk assessments on all Livestock Producers to the business. In addition, the Responsible Sourcing Policy (issued to all existing and potential producers) will be amended to incorporate questions relating to the identification of any practices, that might indicate breaches of the Modern Slavery Act.

Further developments

Whilst we understand that it is sometimes difficult to establish where individuals are being subject to modern slavery, the early warning mechanisms now in place to try and assist us in identifying possible abuses include;

- Salaries – Payments being diverted from individuals and paid to a third party using cash or cheque or being paid via the same bank account
- Accommodation - Multiple occupancy at the same address
- Statutory rights – lack of understanding of their basic statutory rights such as entitlement to sick pay, holiday pay and other benefits;
- Fees and Rates – Very low agency rates;
- Physical signs - individuals showing signs of physical or psychological abuse; including unusual behaviours

Training

The organization commenced its awareness programme in 2016 and continues to -

- Displaying Posters in noticeboards at both sites drawing attention to Modern Slavery
- Arrange for all new cattle producers to be issued with information produced by Closer Together to be displayed on farms.
- Working in conjunction with Waitrose suppliers (HR team) to implement measures to raise awareness amongst producers.
- Livestock Field staff have attended the Stronger Together Workshops.

- Induction for all new employees contains reference to Modern Slavery and shows the 10-minute video, Tackling Modern Slavery.

Further developments

- All farm producers have been issued with a worker code of practice against which they will be audited annually.
- The audits commenced in August 2017 and the results risk assessed as low, medium or high.
- All ingredient and packaging suppliers are Sedex registered.
- Labour providers to the factory are audited twice a year, and must all be registered with the GLAA.
- HR Department checks that the labour providers are registered using the GLAA on-line checking facility.

Signed by:

A handwritten signature in black ink, appearing to read 'Andrew McAllister', with a long horizontal stroke extending to the right.

Andrew McAllister

Managing Director

On behalf of the Board of Directors