

Dunbia Modern Slavery and Human Trafficking Statement 2021

1.0 Introduction

1. This statement is made by Dunbia (UK), a division of Dawn Meats Group, in accordance with section 54 of the Modern Slavery Act 2015 and sets out the actions Dunbia (UK) has undertaken to manage the risk of slavery and human trafficking from occurring in the Dunbia (UK) business or any part of its supply chain.
2. Dunbia (UK) recognises that the risks of such abhorrent and abusive practices are real and are perpetrated in a way that make them difficult to detect. Persistent and ongoing vigilance is required so that people working within Dunbia (UK) and its supply chains are safeguarded and protected from the potential of such abuse.
3. The challenges faced by our industry in 2020 due to the COVID Pandemic and Brexit were unprecedented and were again present throughout the duration of 2021. During 2021 the Health, Safety and Wellbeing of all colleagues has been of paramount importance to Dunbia (UK), the robust governance protocols aimed at protecting colleagues and the business created in 2020 were built upon and expanded in 2021 as we faced the ongoing challenges of the COVID Pandemic. We are extremely proud of our role as part of the national infrastructure and of the contribution made by all in feeding the nation during a time of crisis.
4. This report sets out the progress Dunbia (UK) has made in the reporting period 1st January 2021 through to 31st December 2021 and the actions proposed for the coming period.

2.0 About Dunbia (UK) – Company Structure

5. Dunbia (UK) is one of the leading red meat processors in the UK and has been operating as a family business since 1976. In 2017 Dunbia merged with Dawn Meats Group (“Dawn”), another large and highly reputable family business that has been in operation since 1980. Dawn, like Dunbia (UK), prides itself on its strong, board-driven focus on effective Corporate Social Responsibility and sustainable business practises, the governance of which is overseen by the Group Sustainability Executive and led by its CEO.
6. Dunbia (UK) continues to meet the expectations of its customers, suppliers and employees, to deliver high standards of ethical trading in its operations and supply chains. The 12 factory sites and the legal entity are listed here:

Legal Entity	Dunbia (UK)
Sites	Dunbia Sawley, Dunbia Preston, Dunbia Llanybydder, Dunbia Dungannon, Dunbia Carnaby, Highland Meats, Dunbia Cumbria, Dunbia Crosshands, Dunbia Cardington, Dunbia West Devon, Dunbia Treburley, Dunbia Halesowen

Dunbia (UK)’s values highlighted and illustrated below will support the goal of eliminating the risk of modern slavery from its supply chains.



Dunbia (UK) customers want a supply chain which supports brand protection and protects their reputation as a socially responsible business. Having a sustainable supply base means a commitment to nurturing relationships, finding solutions to common challenges and improving standards. Respecting, empowering and engaging people means developing a culture where poor behaviour and bad practices have nowhere to hide. Seeking continuous improvement means always wanting to get better, challenging one another and recognising work well done. Acting responsibly can only be achieved by treating all stakeholders with respect and demanding this respect in return from the supply chain.

3.0 Supply Chain Structure

7. The Dunbia (UK) supply chain is rooted in UK agriculture through its sourcing of livestock from over 15,000 Red Tractor assured farms across Great Britain and Northern Ireland. Unlike other agricultural sectors, this element of the UK farming sector has a low bought-in labour demand and consists largely of family owned and managed farms.
8. Dunbia (UK) buys the majority of its retail packaging and production consumables from key suppliers based in the UK and Europe. Dunbia (UK) has identified production consumables as having a diverse supply chain. In 2021 Dunbia (UK) continued its review of the supply chain mapping process to allow enhanced monitoring and management of risk which will be ongoing in 2022.
9. A growing part of the Dunbia (UK) business is the production of added value, ready to cook and meal solutions, which introduces a much more complex global supply chain through the sourcing of other food ingredients. The Ingredients Category is managed by a number of Cross Functional Departments including New Product Development, Food Safety and Quality, Site Ingredients Purchasers, whilst being overseen by the Group Strategic Procurement Team. We have a small select ingredient supply base with chosen partner suppliers.
10. Sourcing labour for Dunbia (UK) operations is a key part of the supply chain. In 2021, Dunbia (UK) became a Licensed Sponsor under the New Points Based Skilled Immigration System, this is a privilege which brings with it a number of key responsibilities and obligations. Employing colleagues either directly, or through agency-based labour providers, Dunbia (UK) is extremely proud of its workforce and the role they play in making Dunbia (UK) the success it is today.

4.0 Policies and Practices

11. Dunbia (UK) operates its supply chain in compliance with its ethical trade policy, supplier code of conduct, business code of conduct, sustainable procurement policy, supply chain risk management model and a suite of supplier screening and tendering process documents. All policies are reviewed and updated as appropriate.
12. Dunbia (UK) is an AB registered member of SEDEX and uses this platform to support the management of its supply chain relationships with customers and suppliers.
13. The Dunbia (UK) standard group purchasing agreement places a contractual obligation on all qualifying new group suppliers to register and link via SEDEX and conduct Self-Assessments Questionnaires.
14. Dunbia (UK) has established a Group Ethical Trading Committee, which is responsible for developing the Dunbia (UK) ethical trading strategy, setting annual ethical trading objectives and reviewing the Ethical Trade Strategy and related Policies. The Group Ethical Trade Committee reports to the Sustainability Executive.
15. The company has an established independent confidential and multilingual whistle blowing hotline which can be accessed by all colleagues either by telephone or by website. Access is available 24 hours per day, 7 days per week, 365 days per year. Posters are located at key points across all UK sites promoting the need to report wrongdoing at work. It is our ambition and commitment to tackle hidden labour exploitation and abuse. We have multilingual posters located at key points across all sites with a shared telephone number linked to our multilingual hotline. If any contact is made to this number in relation to human trafficking, labour exploitation or abuse, it is immediately escalated to a trusted manager. Our ethos is prevention, protection and remedy.
16. Dunbia (UK) has an established HR team with a bespoke background and knowledge of the agri-food processing sector, which creates a robust internal governance structure comprising of; a HR Director, a Group HR Manager, a Group HR Projects Manager, a Group Ethical Compliance Manager and site-based HR Managers and teams. Indeed 2021 saw an expansion of this team with the recruitment of a UK Group Recruitment Manager with supporting team members creating a central support function to all UK sites.

5.0 Risk Assessment and Due Diligence

17. The Company considers its supply chain in four key constituent elements of agriculture, material suppliers, ingredients, and labour provision. Dunbia (UK) has risk assessed each element of its supply chain and has initiated strategies that it considers proportionate. Dunbia procures through short, direct and transparent supply chains. In 2021 the Group Ethical Trading Committee reassessed the key supply chain risks.

5.1 Livestock and Agriculture

18. Within the company supply chain, the Director of Livestock Procurement is responsible for modern slavery ethics.
19. Dunbia (UK) has deemed this supply chain to be low risk regarding modern slavery, as it primarily consists of SME's / family-owned farms mainly employing family members.
20. Dunbia (UK) are working with industry organisations, such as the Red Tractor Assurance Scheme, to monitor and manage the risk of modern slavery and to take action if and where appropriate.
21. The Dunbia (UK) Livestock Procurement team regularly visit farms, building strong relationships with local farming communities.

5.2 Material supplies

22. A cross functional team, comprised of group Strategic Procurement and Auditory compliance, is responsible for assessing and mitigating the risks of modern slavery in the procurement of non-livestock products.
23. Material supplies represent a significant proportion of annual spend at Dunbia (UK) and several key suppliers play a critical role in supplying packaging products that carry product to customers, to retail shelves, and ultimately to the end consumer. The company has assessed these key suppliers as being of critical importance to the Dunbia (UK) supply chain and brand, and in 2017 the company engaged its supply base in a new ethical trading agenda.
24. To accelerate change, Dunbia (UK) has taken an approach to risk assess its entire supply chain. All high-risk suppliers identified are prequalified and complete a technical based Self-Assessment Questionnaire (SAQ). New high risk and reassessed existing suppliers to the Group undergo a prequalification process and the request will be made for suppliers to become registered members of Sedex, thus linking with Dunbia (UK).
25. Dunbia (UK) has identified that having longer term supply contracts increases supplier trust and transparency.
26. The majority of paper packaging is certified to FSC or PEFC which include supply chain audits.

5.3 Ingredients

27. The Dunbia (UK) use of food ingredients is very small as a percentage of products manufactured. The supply base consists of UK and Ireland based ingredient manufacturers. However, the company recognises that given the nature of the supply chain in the upstream sourcing of commodity ingredient components that this supply chain is both complex and truly global, involving countries where modern day slavery is a higher risk than it is in the UK. Dunbia (UK) is a

member of FNET and key members of the Strategic Procurement team have been engaged in understanding the extensive nature of the supply chain and became members of the FNET spices and ingredients workstream to increase their knowledge and engagement in this area.

5.4 Labour provision

28. Responsibility for managing the risk of modern slavery in the labour supply chain is led by the HR Director, supported by the Group HR Manager, cascaded to site HR and supported by the Group Ethical Compliance Manager.
29. Dunbia (UK) is a member of the Home Office ECHO Group. The objective is to develop a positive working relationship between the Home Office and employers and to assist with a better understanding of how to prevent illegal working, enforcement issues, the support services available to employers and to exchange information about current trends and future activities.
30. Dunbia (UK) currently has over 5,000 colleagues, and like many food businesses in the UK is required to respond to significant seasonal changes in production demand which calls for a flexible and responsive labour supply chain. Dunbia (UK) recognises this is a critical area to manage and during 2021 continued utilising electronic identity checking of employees in addition to expanding the training of HR staff in response to new right to work regulations, processes and required evidence. Identity fraud is common in human trafficking and introducing these control mechanisms are designed to both detect and safeguard against the risk of human trafficking. A reliable automated solution for authenticating the integrity of passports, ID cards, visas and residence permits is in place as an extra safeguard. This facility which is aligned to meeting each new colleague entering the business, allows us to inspect and scan all national and international passports and ID documents currently in circulation. Support is available from our partner expert helpdesk.
31. During 2021 all UK sites have continued to tirelessly support and assist EU colleagues with their application to the EU Settlement Scheme (EUSS). The HR teams have worked in conjunction with external voluntary and non-governmental organisations such as Migrant Support NI, MIND and the Polish British Integration Centre. Key support from the marketing team was provided to support the application message through the provision of bespoke advertising material. This exercise has created greater workforce engagement. It is our ambition and commitment to ensure that all colleagues who wish to reside in the United Kingdom post June 2021 are assisted during this endeavour.
32. During 2021 Labour Provider auditing, monitoring and information programmes were undertaken. Engagement programmes were undertaken with labour providers which included the EUSS settlement scheme, COVID governance and awareness. These programmes were delivered in languages understood by all colleagues.
33. Since 2017, Dunbia (UK) progressively rationalised the number of agency labour providers it uses and has established a group register of approved labour providers as part of its improved governance process. Labour providers are assessed across a range of criteria including the financial standing of the company as a key indicator of the health and stability of the business. In

2018, the company further developed its engagement of agency labour providers through the rollout of standardised Service Level Agreements.

34. The strategy of Dunbia (UK) in 2021 was to reduce agency colleague numbers, 2021 saw a decline in both the number of labour providers and agency colleague numbers.
35. On the weekly HR call the Group Ethical Compliance Manager updates the regional and site HR managers on appropriate issues arising.

6.0 Training and capability

36. In 2017 the company developed a suite of training materials on Modern Day Slavery and Human Trafficking as part of its internal awareness raising to combat potential abuse and exploitation of workers, which was rolled out to its managers in 2018. All Dunbia (UK) HR managers have received training with the materials in addition to undertaking Stronger Together training. In 2021 the Dunbia (UK) Compliance and Learning Management Team in conjunction with Stronger Together added a Training Module on to the Learning Management System aimed primarily at our Management and Supply Chain teams. The key objective being to expand existing training on the risks of potential labour exploitation and abuse to key stakeholders. Training rollout commenced in 2021 via the Dunbia Learning Management System and continues in 2022.
37. All colleagues entering the business receive training on the risks and threats posed by labour abuse and exploitation as part of the on boarding process.
38. Dunbia (UK) supports the principle of Responsible Recruitment. Service Level Agreements clearly set out that suppliers shall not charge a worker any 'finder's fee' or charge any obligatory fee for providing work. Additionally, suppliers must be members of an appropriate trade body and are committed to raising the standard of UK labour provision.
39. The Strategic Procurement Team numbers were expanded in 2021 and they undertook bespoke training in Ethical Trade and Sustainable Procurement best practices. There is ongoing monitoring and review of best practice with team updates as appropriate.
40. 2021 provided heightened opportunities for possible labour exploitation and abuse due to a combination of the COVID Pandemic and the Brexit position post June, which increased the potential threats. Our trained HR practitioners and site management teams are acutely aware of potential risk situations and have again been vigilant during this period; 2022 will offer similar challenges.

7.0 Measuring effectiveness

41. Dunbia (UK) measures the effectiveness of its ethical trading initiative through KPIs relating to incident reporting through its whistleblowing hotlines, and the incident management escalation process via the ethical trading committee. The company will continue to develop and refine its success measures in line with the Group CSR strategy and remains committed to ensuring modern day slavery issues do not occur within the business and its supply chain. This will continue to be a key focus for the business in 2022.

In order to monitor the effectiveness of the steps taken to prevent slavery and trafficking taking place in our business and supply chain, it is intended to use the following performance indicators:

- Detailed monitoring /recording of all complaints received via our whistleblowing lines.
- Tracking of ongoing training of existing and new people to ensure a full understanding of the commitments of the Modern Slavery Act and ethical trading initiatives and delivery of in house and external ethical training awareness.
- Expansion of the Ethical Compliance Team in 2022.
- An annual audit of all Labour providers.
- An annual review of key supply chain risk assessments.
- Increased registration of suppliers on SEDEX platform.
- Commitment to continuous improvement and annual review of our recruitment and induction practices.
- Translation of current protocols into the most commonly spoken languages where appropriate.
- Tracking the number of longer-term supply contracts.

8.0 Statement Approval

42. This statement has been formally approved by the Dunbia (UK) Executive and its shareholders on 30th June 2022

Signed:



Niall Browne, CEO