



## **Modern Slavery and Human Trafficking Statement**

### **For the Financial Year Ended 28<sup>th</sup> April 2018**

**This statement is made in accordance with Section 54, Part 6 of the Modern Slavery Act 2015. It constitutes our modern slavery and human trafficking statement for the financial year ended 28 April 2018.**

#### **Structure**

Abel & Cole Limited is a subsidiary of William Jackson Food Group a sixth-generation family business. We are an ecommerce business supplying a range of Organic groceries direct to customers within England and Wales.

The company is head-quartered in Wimbledon, London and has production and distribution sites across England.

#### **Our Values**

Our values underpin every aspect of our business, and consist of believing in organic food, being bold, and caring about each other, the environment, our farmers and suppliers and our customers. We strive to be a business to be proud of and feel that a community should be a better place for having our business in it.

#### **Policy Statement**

We are committed to eradicating all instances of modern slavery or human trafficking taking place in our business, or the suppliers we deal with. This statement reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure no slavery or human trafficking exists anywhere in our supply chains.

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Abel & Cole Board has overall responsibility for ensuring this policy and its implementation comply with our legal, moral and ethical obligations. Leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

#### **Training and Awareness**

We are working with the Stronger2gether programme to ensure all relevant colleagues receive the appropriate level of training to raise awareness of modern slavery and human trafficking, and the knowledge to address any related issues which may arise.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Through our training programme and procedures, colleagues will be reminded of the Group Whistle-blowing Policy as the primary method of reporting any suspicions or evidence of slavery or human trafficking.

We will accept and take seriously concerns communicated anonymously.

The Company encourages members of the public or people not employed by us to write, in confidence, to the Managing Director or the Head of People to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

### **Prevention Within Our Business and Supply Chain**

We will take action to address any evidence of slavery or human trafficking. We will undertake the following activity in order to assess and manage such risks within our business and supply chain:

- Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- Engage with our suppliers both to convey to them our stance on modern slavery and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
- Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- Our supplier approval process requires our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- We are active members of the Supplier Ethical Data Exchange (Sedex) and encourage all of our suppliers to engage with organisations such as Sedex or the Ethical Trade Initiative (ETI) that promote the core conventions of the UN's International Labour Organisation.

This statement has been reviewed and approved by the Board on 23<sup>rd</sup> October 2018.

Signed



Hannah Shipton

Managing Director

23<sup>rd</sup> October 2018



## **Modern Slavery and Human Trafficking Statement**

**For the Financial Year Ended 29<sup>th</sup> April 2017**

### **Structure**

Abel & Cole is a subsidiary company of the William Jackson Food Group which is a sixth generation family business. We are an ecommerce business supplying a range of Organic products direct to customers within England and Wales.

The company is headquartered in Wimbledon, London and has production and distribution sites across England. The company turnover is £70m.

### **Our Values**

Our values underpin every aspect of our business, and consist of consideration, people, integrity, boldness, openness and commitment. We strive to be a business to be proud of and feel that a community should be a better place for having our business in it.

### **Policy Statement**

In line with our values, we are committed to ensuring that there is no modern slavery or human trafficking taking place in any part of our company, or the suppliers we deal with. This policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure no slavery or human trafficking exists anywhere in our supply chains.

### **Training and Awareness**

We will work with the Stronger2gether programme, the Gangmasters Licensing Authority and Association of Labour Providers to ensure all colleagues receive the appropriate level of training to raise awareness of modern slavery and human trafficking, and the knowledge to address any related issues which may arise.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Colleagues will be reminded of the Group Whistleblowing Policy as the primary method of reporting any suspicions or evidence of slavery or human trafficking.

Abel & Cole will accept and take seriously concerns communicated anonymously.

Abel & Cole encourages members of the public or people not employed by us to write, in confidence, to the Managing Director or the Head of People to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

## **Supply Chain Management**

We will take action to address any evidence of slavery or human trafficking in any of our supply chains. In order to affect this we will:

- conduct auditable risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
- where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

We are active members of the Supplier Ethical Data Exchange (Sedex) and encourage all of our suppliers to engage with organisations such as Sedex or the Ethical Trade Initiative (ETI) that promote the core conventions of the UN's International Labour Organisation.

## **Responsibility for the Policy**

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Abel & Cole board has overall responsibility for ensuring this policy and its implementation comply with our legal, moral and ethical obligations.

Leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

## **Compliance and Review**

This policy has had compliance input from the following departments and external sources; Legal, Sustainability, Communications, Human Resources, Procurement.

Following its initial adoption this policy will be kept under regular review by the Abel & Cole Board and may be amended from time to time. This policy will be used to inform our Statement on Modern Slavery and Human Trafficking which will be published no later than the publication of our 2016 financial results.