



Modern Slavery and Human Trafficking Statement

For the Financial Year Ended 28 April 2019

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 2019.

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. The turnover is around £60m.

Our Values

Abel & Cole is a value and purpose led business and always has been. Our values underpin every single aspect of our business. We care, we believe in organic, we have fun and we are bold. We also believe that a community should be a better place for having our business in it.

Policy Statement

We source more than 1,000 different organic ingredients, packaging and indirect goods and services, working to strict organic sourcing policies with around 300 suppliers in the UK and overseas. From day one Abel & Cole has tried to do things the right way. Over the years, this commitment to the ethics and standards of organic has remained fundamental to Abel & Cole. It's an all-encompassing ethos and way of working that resonates with every employee, supplier and partner. It's shown in the way Abel & Cole works with suppliers, often helping farmers on their journey to organic certification. We're now B Corp Certified.

We are committed to eradicating all instances of modern slavery or human trafficking taking place in our business, or at any point in our supply chain. We are committed to acting ethically and with integrity in all our business relationships. We are committed to implementing and enforcing effective systems and controls to make sure no slavery or human trafficking exists anywhere in the sometimes far reaching world of Abel & Cole.

Ultimate responsibility for upholding our commitment to the prevention of modern slavery rests with the Abel & Cole Board. They have overall responsibility for ensuring this policy and its implementation comply with our legal, moral and ethical obligations. Saying this, leaders at all levels at Abel & Cole are responsible for checking that those reporting to them understand and comply with this policy, and are given adequate and regular training on the issue of modern slavery and how to identify it.

Training and Awareness

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

With all of this our aim is to encourage openness so that we can support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are determined that no-one should suffer 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.

As part of our training programme and procedures, Abel & Colers will be reminded of the William Jackson Food Group's Whistle-blowing Policy as the primary method of reporting any suspicions or evidence of slavery or human trafficking.

We accept and take seriously concerns communicated anonymously.

We encourage members of the public or anyone not employed by us to write, in confidence, to the Managing Director or the Head of People to raise any concerns, issues or suspicions of modern slavery in any part of our business or supply chain.

Prevention Within Our Business and Supply Chain

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

- Conduct risk assessments to see which parts of our business or suppliers are at risk of modern slavery so we can focus our efforts on those areas.
- Engage with our suppliers, both to share our stance on modern slavery and to gain an understanding of the measures they are taking to ensure modern slavery is not occurring in their businesses.
- Where appropriate, as informed by our risk assessment, we 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 also commit 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.

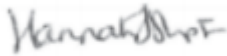
Our priorities for the coming year are:

- To work closely with any supplier that is deemed to be at high risk of modern slavery or human trafficking either within their own operations or in external supply chains. We'll highlight awareness of the issues then understand what control measures they have in place, and work with them on any improvements we identify.
- To re-publicise our whistle-blowing policy so all our people understand how to safely raise any concerns about possible instances of modern slavery or human trafficking within our own operations or our supply chains.
- Extend supplier risk assessments to cover any possible touchpoints our suppliers may have that could be exposed to, or vulnerable to, modern slavery or human trafficking.
- Record and report on Sedex (or equivalent) membership of our ingredients and packaging suppliers.
- Extend internal Stronger2gether training to all of our buying, HR, technical and operations teams.
- Extend risk assessments down the supply chain into 'hot-spot' areas.
- Place modern slavery and human trafficking as a regular agenda item in all relevant meetings.

- We will signpost smaller suppliers to the Home Office supported consultancy service to assist them in identifying, addressing and managing their exposure to modern slavery and human trafficking.
- Introduce our own Responsible Supplier Programme to vet existing and new suppliers' ethical practices.
- We will ensure that GLAA-compliant audits are conducted on all of our labour providers.

This statement has been reviewed and approved by the Board on 16th October 2019.

Signed



Hannah Shipton

Managing Director

23rd October 2019