



Modern Slavery and Human Trafficking Statement for the Financial Year Ended April 2021

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 April 2021.

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 £113m.

Policy Statement

We source more than 2,000 different organic products, 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've been B Corp Certified since 2018.

We are committed to eradicating all instances of modern slavery or human trafficking taking place in any part of our group, 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 Group Management 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 Stronger Together 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 have conducted Stronger Together training for key members of the People, Operations, Technical and Procurement functions and have also added training to part of our induction process for all colleagues. Some colleagues on development programmes are also being given the training.

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 because 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, Abel & Colers have been reminded of William Jackson Food Group's whistle-blowing Policy as the primary method of reporting any suspicions or evidence of slavery or human trafficking. We have also re-publicised the WJFG whistle-blowing policy in our internal comms to ensure that all our people understand how to safely raise any concerns they may have about possible instances of modern slavery or human trafficking within our own operations or our supply chains.

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. During the past year we have undertaken the following key activities to assess and manage such risks within our business and supply chain:

- Co-ordinated activities across the William Jackson Food Group
- We are using checks during recruitment to spot any areas of concerns and auditing recruitment agencies to ensure compliance. In addition to this, we now carry out random data checks at regular intervals, looking for things like multiple colleagues living at the same addresses and colleagues with the same bank accounts.
- Placed modern slavery and human trafficking as a regular agenda item on all relevant synergy group meetings.
- Distributed Stronger Together materials for display at all our sites.
- Conducted risk assessments across all suppliers of products and packaging 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.
- Engaged 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.
- During the contract review process, we have aimed to engage directly with all suppliers assessed as being at high-risk of modern slavery or human trafficking within their own operations or external supply chains to highlight awareness of the issue and understand the control measures, they have in place.
- Continued to be active members of the Supplier Ethical Data Exchange (Sedex) and encouraged all 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.
- Recorded and reported on Sedex (or equivalent) membership of our ingredients and packaging suppliers.
- Sign-posted suppliers to resources provided by Stronger Together and Sedex.

Our priorities for the coming year are:

- To establish an ethical sourcing committee
- Develop a modern slavery policy
- Carry out supplier engagement training
- Extend our supplier risk assessments to selected categories of indirect expenditure
- Commence audits on our suppliers using a risk-based approach
- Extend risk assessments down the supply chain into 'hot-spot' areas
- Give a summary of Modern Slavery warning signs and policies via our in-house Journal
- Re-publicise the WJFG whistle-blowing policy
- Extend internal Stronger Together training to all colleagues
- Ensure that GLAA-compliant audits are conducted on all labour providers

This statement has been reviewed and approved by the board on 21st September 2021

Signed



Hannah Shipton
Managing Director