

**Golden Acre (“GA”)**  
**Modern Day Slavery and Human Trafficking Statement**  
**For the Financial year 2018**

**Introduction**

This statement has been produced as a response to section 54 of the Modern Day Slavery Act 2015 which categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking.

GA has a zero tolerance approach to slavery and human trafficking. We expect all our suppliers to incorporate the same values within their own companies. This statement sets out GA policies and strategy regarding Modern day slavery for the year ending 31st December 2018.

**Our Business**

GA is an importer of food, based in the UK. All manufacturing, transportation and warehousing is sub-contracted to third party organisations. GA provides food products and services to UK & Irish retailers, distributors and hospitality industries. We supply Golden Acre and associated branded products, manufacturers own brands and retailers own label products, sourced worldwide. As a result, our supply chains are complex and we recognise the importance of both visibility and transparency with the supply chain, in order to identify and eliminate human slavery and human trafficking. We will achieve this through a combination of risk assessment, collaborative work with our supply chain partners and implementation of policies.

Our suppliers often have their own complex supply chains and consequently, it is not possible for us to directly monitor or control the working conditions of each company within the supply chain. Therefore we undertake to monitor and work with our direct suppliers, to ensure full compliance.

**Organisational Policies**

GA’s approach to tackling modern day slavery is to develop and use policies and procedures based on its obligations under the Modern Day Slavery Act 2015 and the guidance set out in the nine-point Ethical Trade Initiative (ETI) Base Code. This will create a proper understanding and set expected standards.

GA is a member of the Supplier Ethical Data Exchange (SEDEX), a not for profit organisation dedicated to driving improvements in responsible and ethical business practices across global supply chains. All of our suppliers are required to confirm signed acceptance and compliance with the ETI Base Code Criteria. A number of our suppliers are also members of SEDEX.

GA’s Whistleblowing policy protects all of its employees, enabling them to raise concerns about any suspected illegal or inappropriate action by the business in confidence and without risk of reprisals.

Alongside this the company will revise its policies during 2018 to further defining Golden Acre’s stance against modern day slavery and its employee’s responsibility to conduct business in an ethical manner.

## **2018 Actions**

During 2018 GA will improve its risk management tracking by implementing a simple standard risk assessment procedure to monitor its supply chain partners.

This will include:

- i. Briefing and training of staff
- ii. Surveillance surveys to ensure supply chain partners meet, as a minimum the ETI base code standards.
- iii. Creating an internal report and KPI indicators for senior management to review

## **Performance indicators**

Through 2018 we will develop key performance indicators to verify the effectiveness of our actions. These will be used to create a senior management report and create an action plan for 2019.

## **Commitment**

The directors and staff of GA are committed to ensuring that their business activities are ethical and sustainable. They want to ensure that GADF plays its part in elimination of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking within the supply chains in which it operates.

## **Summary**

As part of GA zero tolerance approach this document will be communicated both to all suppliers as well as externally on the company's main website ([www.goldenacrefoods.com](http://www.goldenacrefoods.com)).

Signed on behalf of Golden Acre Dairy Foods Ltd



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Neale Powell- Cook

Managing Director

Date: