



Modern Slavery and Human Trafficking Statement

Introduction

This statement is made by Dawn Meats (UK) ["Dawn Meats"] and sets out the steps the Company has implemented to ensure that slavery and human trafficking is not taking place in its supply chain or any part of its business. It is a Statement made in accordance with Section 54 of the Modern Slavery Act 2015 (the MSA), and covers the financial year from January 1st 2016 to 31st December 2016.

Dawn Meats is fully committed to the objectives of the MSA and recognises its responsibility to be aware of potential risks of modern slavery within the organisation and its supply chain. Modern slavery is a global problem. It is complex and is characterised by exploitation and abuse. Working in collaboration with our business partners we are committed to monitoring, reviewing, improving, aligning and developing our management systems to ensure the integrity and transparency of our supply chain both at home and overseas.

The CEO and Senior Management Team have ongoing responsibility for ensuring that the statement is published annually and accurately reflects the company's measures and initiatives to tackle slavery and human trafficking. The Group Human Resources department and site HR Managers are responsible for implementing policies and reviewing the process by which they are developed. The HR teams are also responsible for the cascade of information throughout the sites and the conveying of similar messages to the wider business.

In addition, we have appointed a Modern Slavery Champion, whose role it is to ensure that we are doing all that we can to avoid the possibility of modern slavery occurring within our operations and supply chain. Furthermore, a key objective of the company's Corporate Social Responsibility forum is to devise and implement ethical initiatives to endorse the company's commitment to acting ethically and with integrity in all its business practices.

About Us

Dawn Meats is a premium meat processor and supplier of choice to a range of leading supermarkets, food service and restaurant businesses. Established in 1980, Dawn Meats is now an industry leader. We employ more than 3,300 staff in ten countries, exporting to over 48 countries. At Dawn Meats we are committed to our staff and our customers. People are our strength and dedication to excellence is at the heart of Dawn Meats success.

We welcome and encourage fresh thinking and actively build on an innovative culture across the company. We are a family owned business, which remains true to its farming heritage through the close relationships it has forged with 20,000 farmers in the UK and Ireland. Dawn Meats works closely with some of the world's leading food companies who are attracted by our commitment to business integrity, sustainability and quality.

Our Supply Chain

Our supply chain includes the sourcing of livestock and raw materials principally related to the provision of food. The manufacturing supply chain is one of the most complicated of any industry with several tiers of suppliers.



Supply chain transparency, security and integrity are crucial components of our business model. We have implemented robust technical and traceability systems to ensure that our products are responsibly sourced from suppliers whose values are aligned with our own. We have clearly established internal processes which set out to verify that our key suppliers comply with our own very high standards which includes a long term established and detailed farm auditing programme.

We are an AB member of SEDEX (Supplier Ethical Data Exchange) and we encourage our suppliers to register and complete a SEDEX SAQ as part of their relationship with Dawn Meats. Those suppliers who are not members of SEDEX need to demonstrate their compliance and commitment to ethical trading and supply chain integrity in order to qualify for a relationship with our company. All sites within Dawn Meats extensively undertake Ethical Trade Audits.

Our Standards

Dawn Meats has a fundamental commitment to acting ethically and with integrity in all business relationships. We are committed to working collaboratively with our business partners to ensure that our supply chain is transparent and is free from labour exploitation and abuse. Our commitment is extended to social and environmental responsibility and we have a zero tolerance of slavery and human trafficking.

Our Social Accountability Policy embraces the principles of the Ethical Trading Initiative base code. It specifically addresses the key subjects contained in the Modern Slavery Act as the following excerpt taken from section 1 demonstrates: -

'Employment is freely chosen. There is no forced, bonded or involuntary prison labour. The Group operates a policy of providing equal opportunities to all workers. Workers are not required to lodge deposits or identity papers and are free to leave after notice.'

Ethical Best Practice has been identified as a bedrock of the Dawn Meats business model. The risks posed by Slavery and Human Trafficking are continually monitored by our Modern Slavery Champion and HR Leaders.

Risk Assessment

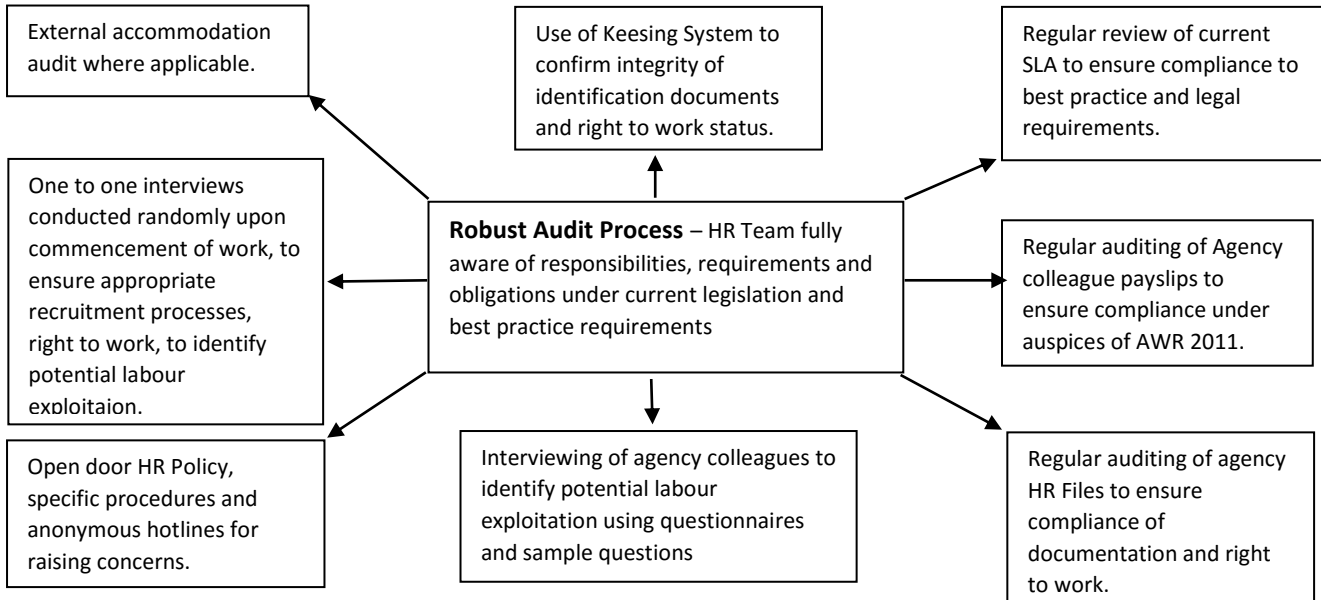
One of the largest risks in our supply chain lies with our labour providers as the numbers of temporary workers may rise significantly at peak times of the year. We have stringent Service Level Agreements in place with our labour providers to ensure that they are fully committed to the principles of the Modern Slavery Act, and we remain acutely alert to any hidden labour exploitation which may include practices such as bonded labour, payment for work finding services, payment for access to specific shifts and forced use of accommodation.

Dawn Meats use labour provider partners to supply a percentage of our workforce. These are long established business relationships with providers who are fully aware of the Company's compliance requirements. All labour providers to Dawn Meats are registered with and in possession of a valid GLA licence and are required to attend Stronger Together Workshops as part of our terms of business.

Active Check immediately highlights to us any changes in license status. The diagram below maps out the planned monitoring and audit process for labour providers. Each labour provider will be audited on an annual basis.



Diagram Outlining Labour Provider Audit and Monitoring Process for 2017



Training and Awareness

We have an ongoing training programme for HR Leaders to ensure that they are fully trained on the risks posed by labour exploitation. HR practitioners have and will be attending Stronger Together Workshops which are aimed at tackling modern slavery in the supply chain.

The learnings and knowledge from these workshops will be communicated at induction and refresher induction to Dawn employees and agency colleagues alike.

In 2016 to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business we embarked on an education awareness campaign with our senior managers via two methods – the Executive Team briefing and the Company’s Corporate Social Responsibility forums. The company has reinforced its responsibility under the Modern Slavery Act via its commitment in the published 2016 CSR report which appears on the Company’s website.

Whistleblowing Policy / Whistleblowing Line

We have a robust and established Group Whistleblowing Policy that is brought to the attention of all employees and agency workers who join Dawn Meats. The policy which is translated into a number of languages is published on staff notice boards. Additionally, there is an anonymous confidential hotline in place. Information posters are published in both English and Polish. The line is available 24 / 7 and is manned by a team of independent professionals who have translation facilities available in multiple languages to all callers.

This confidential helpline is available to all employees, contractors and agency workers. It is managed entirely independently by a 3rd party who will investigate any complaints made.

Dawn Meats encourages and supports any individuals who raise genuine concerns to ensure that no one suffers as a consequence.



Measuring Effectiveness – Performance Indicators

In order to monitor the effectiveness of the steps taken by the business to prevent slavery and trafficking the company will use the following indicators on an ongoing basis: -

- Detailed monitoring /recording of all complaints received via our Confidential Hotline.
- Ongoing training of existing and new people to ensure full understanding of the commitments of the Modern Slavery Act and ethical trading initiatives.
- Ongoing annual audit of all Labour providers
- Increased usage of SEDEX platform in close conjunction with our suppliers.
- Delivery of in house and external ethical training awareness to key people.
- Commitment to continuous improvement and thus a review of our recruitment and induction practices.
- Full review and audit of transportation practices to and from work.
- Translation of relevant policies into most commonly spoken languages other than English.

Niall Browne

Chief Executive

This Statement has been approved by the CEO and Senior Management Team who will review and update annually.