

Rowse Honey Limited

MODERN SLAVERY STATEMENT

covering the period 1 April 2023 to 31 March 2024

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1 Message from Kevin Moore, Chief Executive Officer



This is Rowse Honey Limited's Modern Slavery Statement covering the period 1 April 2023 to 31 March 2024. It sets out the steps we have taken as a business to combat modern slavery and human trafficking, measuring our progress against identifiable KPI's. We are committed to improvement and will continue to develop our strategies to tackle this serious issue and prevent slavery or trafficking from occurring in our operations and supply chains.

This year Rowse Honey Limited has reinforced its commitment to eradicating modern slavery and human trafficking from its business and its dealings with suppliers including (but not limited to) the following actions:

1. Policies encompassing human rights applicable to suppliers and employees have been rolled out;
2. Rolled out annual refresher training for all staff to ensure that the issue of modern slavery is fore front of mind when dealing with our colleagues or entering into or renewing supply contracts.

Rowse Honey Limited is opposed to modern slavery at any level and our zero-tolerance approach recognises the responsibility that we share with our suppliers to tackle hidden labour exploitation. We expect and maintain the highest standards from our staff and anyone with whom we do business.

2 Introduction

This statement is made pursuant to Modern Slavery Act 2015 by Rowse Honey Limited ("Rowse" "we" "our"). It outlines the measures we have taken to assess and reduce the risk of slavery and human trafficking occurring in our business or supply chains in the financial year 1 April 2023 to 31 March 2024. It also outlines our commitments to continue to reduce the risks in our financial year commencing 1 April 2024.

3 Organisation's Structure

Rowse sources, blends and packs bottled honey, maple and agave syrups, fruit curds and sauces. In addition to supplying supermarkets for consumer purchase, we also provide bulk orders to restaurants, caterers, and wholesale and manufacturing companies.

Our registered office is at 9 Perseverance Works, Kingsland Road, London, E2 8DD and our principal place of business is at Moreton Avenue, Wallingford, Oxfordshire, OX10 9DE where we have circa 310 employees. Our parent company, Valeo Foods Group is based in Dublin in the Republic of Ireland.

4 Our Supply Chains

We source raw materials from a global network of approximately 130 product-based partners including direct suppliers and agents. They provide:

- Honey, Maple and agave syrups;
- Raw materials required to produce fruit curds and sauces;
- Glass and plastic retail packaging – as well as bulk packaging;
- Sub- contracted packaging services.

All of our suppliers are either registered on SEDEX or assessed using an ethical audit.

At the date of this statement, Rowse has no issues with any of its suppliers that should be disclosed pursuant to the Modern Slavery Act 2015.

5 Our Policies & Memberships

Our commitment to ensuring no Modern Slavery or human trafficking in any part of our business is reflected in our policies. Our policies include (although not exhaustive):

5.1 Supplier Code of Conduct

This Policy covers issues such as human and labour rights, health and safety and ethical business practices.

Where any non-compliance issue is identified, we require our suppliers to address it and we reserve the right to terminate our relationship if this is not done satisfactorily.

5.2 Employee Code of Conduct

This sets out our internal standards, expectations and accountability.

It incorporates an understanding of the risks of modern slavery and human trafficking within our business and supply chains.

The Code of Conduct is available to employees via our intranet and any updates are communicated to employees as appropriate. Employees who breach our Code of Conduct and any related policies may be subject to disciplinary proceedings.

5.3 Ethical Working & Whistle Blowing

The Ethical Working Policy outlines our commitment to taking action to minimise the risk of modern slavery within our business and supply chain and encourages appropriate working conditions amongst workers within our field of influence.

The Whistleblowing Policy enables employees, suppliers and third parties to raise any concerns about working practices that they believe breach the law or company policies. The helpline is advertised on company premises and is available 24/7.

5.4 SEDEX Membership

Rowse is an active member of SEDEX (Supplier Ethical Data Exchange) a not-for-profit membership organisation and is required to undertake regular, semi-announced audits based on the ETI (Ethical Trade Initiative) Base Code which is founded on the conventions of the International Labour Organisation and its internationally recognised code of labour practice.

The Ethical Trade Initiative Code of Conduct sets out the standards we expect our suppliers, regardless of the legal requirement under the MSA and recognises our commitment to the Ethical Trade Initiative (ETI base code) and compliance to the ILO conventions.

5.5 Governance

Responsibility for the preparation of our Modern Slavery Statement sits with our HR team and is approved by our board of directors. The Procurement, Technical, and Operations teams are responsible for carrying out the implementation of all applicable policies and procedures.

6 Due Diligence

The following form part of our due diligence procedures:

We continue to use the globally recognised platform SEDEX to assess business practices within our own operation and we require all processors to become members and complete the SEDEX SAQ to ensure we have visibility of our supply chain. We also issue an ethical self-assessment questionnaire to our suppliers for completion which incorporates all aspects of the ETI base code. These sources of information enable us to risk assess our supply base.

During the period we have not been made aware of any actual or suspected cases of modern slavery in our business or supply chain.

We work collaboratively with our direct customers to ensure we fully comply with their ethical codes of conduct, and we participate in a bi- yearly independent audited SEDEX Members Ethical Trading Audit (SMETA). Further to our 2023 audit we have no outstanding non-conformances.

We are aware that there is a risk through the use of agency staff within our manufacturing site, we mitigate this by using only specified, approved and reputable employment agencies to source labour. All labour agencies are registered members of the Gangmaster Licensing Authority.

6.1 Risk Assessment and Management

The following groups of workers have been identified as vulnerable to the risks of modern slavery and Rowse HR Team is trained to be mindful of this when dealing with workers who fall into one of these categories:-

- Migrant workers;
- Minority groups; and
- Contract, agency and temporary workers.

Our HR team is trained to be aware of other indicators of modern slavery such as someone who doesn't have their own passport, someone who is withdrawn/frightened or someone who has little control over their finances/who has no access to a bank account. The key consideration is awareness of the potential warning signs. If a concern is raised to us, the matter would be immediately referred to the Head of HR who may contact the police, home office or any other body as appropriate.

Rowse has several pre-emptive measures in place including:

- We do not accept any communication through a third party on behalf of an employee;
- We do not pay an employee's salary into a third-party bank account;
- We will not raise a cheque in another person's name even if requested by the employee;
- We do not prevent membership of a union or representative body; and
- We have in place easily accessible grievance procedures available to all employee and workers.

6.2 Supplier Relationships

The Procurement Director and Head of Technical are responsible for supplier relationships. If there are concerns over performance, these individuals will decide whether to continue to do business with the relevant supplier and take any further appropriate action which may include (but is not limited to) the following:

- Reporting concerns to the appropriate authorities;
- More frequent audits; and
- Termination of the supplier relationship.

6.3 Audit Programme

Audits are principally conducted by the Technical and Procurement teams.

During the period covered by this statement, we have audited the agency that supplies all frontline temporary labour on an annual basis by the HR Team. Our HR team conducts interviews with a cross section of the agency's temporary workers in accordance with its SEDEX membership asking questions pertinent to modern slavery such as how their work was chosen and pay related questions. Before this, our HR team regularly conducted audits of all our recruitment agencies from where temporary staff were supplied which included a verification that the agency provider has developed and implemented a "tracking modern slavery policy" detailing the processes it will take to prevent forced labour.

As part of our SEDEX membership, and our conditions of supply with several of our key customers, we are required to undertake regular semi-announced SEDEX Members Ethical Trade Audits (SMETA).

All suppliers are required to complete the Rowse Honey Ltd Supplier Questionnaire and Risk Assessment every 2 years. If a supplier is not SEDEX registered such supplier will automatically be considered high risk and must provide documentation to Rowse Honey Ltd to demonstrate it has conducted due diligence with its suppliers.

As a SEDEX member ourselves, we are also subject to SEDEX audits. A full audit was carried out during the period covered by this statement. Our Technical Team addressed any issues raised and will continue to ensure any recommendations are actioned.

7 Key Performance Indicators

To monitor the effectiveness of the steps that we have taken to combat modern slavery and human trafficking in our business and its supply chains, we used the following key performance indicators (“KPI’s”) during the period covered by this statement:

No.	KPI	Period covered	Percentage achieved or narrative on compliance
3	SEDEX SAQ Risk Assessments of all suppliers.	1 April 2022 to 31 March 2023	100% achieved
4	All raw material Suppliers must be either SEDEX registered or complete Rowse SAQ Ethical Questionnaire, dependant on number of employees	1 April 2022 to 31 March 2023	100% achieved
5	Due diligence is completed before engaging a new supplier.	1 April 2022 to 31 March 2023	100% achieved
6	Audit of HR agencies to ensure each has developed & implemented a tracking modern slavery policy.	1 April 2022 to 31 March 2023	100% audits achieved
7	All high-risk suppliers as identified via SEDEX Risk Assessment, are followed up/SMETA audited.	1 April 2022 to 31 March 2023	100% audits achieved
8	All suppliers complete a Rowse Honey Ltd questionnaire & risk assessment every 3 years.	1 April 2022 to 31 March 2023	100% questionnaires and assessments completed
9	All employees receive modern slavery training during induction.	1 April 2022 to 31 March 2023	100% compliance
10	All employees received annual modern slavery update training.	1 April 2022 to 31 March 2023	100% compliance
12	Full SEDEX audit of Rowse Honey Ltd completed.	1 April 2022 to 31 March 2023	100% completed

8 Training

Rowse conducts training and assessment as part of the induction into the organisation for all new employees via e-learning with a test to demonstrate understanding of the concepts taken at the conclusion of the session with employees expected to gain 80% and above. Additionally, annual refresher training for all office-based employees has been rolled out via the company’s intranet and annual toolbox talks are conducted for all production employees.

9 Going Forward

Rowse shall continue its commitment to ensuring that modern slavery and human trafficking does not take place in our supply chains. We will continue to work with our suppliers to identify and tackle hidden labour exploitation. However, we recognise that there is still much to do. During the next financial year we will:

No.	KPI	How KPI will be measured
1	Evaluate our current due diligence and onboarding process including its effectiveness to ensure it remains fit for purpose. Implementing any changes if required.	Review conducted and changes implemented if required.
2	All departments to review its policies and procedures, updating where necessary, providing copies to the HR Team in order to maintain the central record.	Percentage of policies and procedures reviewed and updated (if required) and thereafter provided to the HR Team.
3	Our Supplier Ethical Code of Conduct will be included in the Risk Assessment of all new supplier and such suppliers will be asked to agree to comply with its provisions.	Percentage of new suppliers informed about our Supplier Ethical Code of Conduct as part of the Risk Assessment process.

10 Publication

Rowse Honey Limited's Modern Slavery Statements (current and previous Statements) are published on:

- 1) the Rowse website at <https://rowsehoney.co.uk/>;
- 2) The UK government's Modern Statement Registry at: <https://modern-slavery-statement-registry.service.gov.uk/>

11 Conclusion

Rowse Honey Limited is constantly striving for improvement to tackle modern slavery head on. During the period 1 April 2023 to 31 March 2024, Rowse continued to work to increase awareness of risks and reporting channels. We will continue to develop our commitment to combat modern slavery and will update our company policies, contracts and employee training as appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2023. It was adopted by the board on 22 October 2024.

Kevin Moore, Chief Executive Officer, Kettle Foods Ltd

Signature



Date: 22 October 2024