



Modern Slavery Policy Statement – 2024

Policy Statement

Dovecote Park remains dedicated to our aim of preventing slavery and human trafficking in our supply chain and business. By making sure that every employee at Dovecote Park is treated with the fundamental principles of respect and dignity, we will reaffirm our commitment to help eliminate the opportunities for modern slavery to exist.

Modern slavery, and the associated consequences continue to be one of the most challenging human rights issues within the UK. It is estimated that over 50 million individuals globally, are victims of this epidemic, with more than 27 million in forced labour. Women, children and migrants remain disproportionately affected.

Organisation Structure and Supply Chains

Dovecote Park is a dedicated and privately-owned meat processing plant supplying beef, veal and venison to Waitrose Supermarkets. We also work with brands such as Aldi, Burger King and Marks and Spencer. Our supply chain extends from the farmer rearing the cattle to ingredients and packaging. The organisation currently operates solely within the United Kingdom (UK), although some of our suppliers are not based in the UK.

High-risk Activities

As a company we still believe that none of our activities or those of our suppliers are considered to be at a high risk of slavery or human trafficking. However, we continue to remain vigilant and we do not ignore the fact that this can occur. Therefore, we continue to monitor and take appropriate action, where necessary.

Responsibility

We believe that everyone that works for Dovecote Park has a responsibility to ensure the organisation's anti-slavery stance is imbedded in their work.

However, direct responsibility for the organisation's anti-slavery initiatives are as follows: -

- **Policies** – The Board of Directors are responsible for the drafting and reviewing of the company's policy on an annual basis.
- **Risk Assessments** - The Purchasing Manager in conjunction with the Technical Manager will be responsible for ensuring compliance of all suppliers with the exception of Livestock which will be the Responsibility of the Agriculture Manager in conjunction with the HR Manager. They will jointly undertake any investigations and due diligence required to ensure compliance or where there is a suspicion of any breaches under the Modern Slavery Act.
- **Training** - All senior managers, and the Purchasing Manager have attended training in the Modern Slavery Act. Producers receive training based on the Stronger Together workshops at Producer open days.

Due Diligence

At the very least, we expect that our suppliers and ourselves comply with all relevant laws and rules, provide safe working conditions, treat employees with respect and dignity, and behave in an ethical and just manner.

We will continue to conduct risk assessments on all Livestock Producers to the business. In addition, the Responsible Sourcing Policy (issued to all existing and potential producers) will be amended to incorporate questions relating to the identification of any practices, that might indicate breaches of the Modern Slavery Act.

Relevant Policies

Dovecote Park operate strict adherence to the Ethical Trading Initiative Base Code (ETI Base Code). This is founded on the conventions of the International Labour Organisation and is an internationally recognised code of labour practice. The company is also a member of Sedex, the Supplier Ethical Data Exchange which is a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains and monitors adherence of all members against the principles of the ETI Base Code. Dovecote Park require all suppliers (with the exception of Livestock) to be Sedex registered.

The organisation uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency before accepting workers and continues to carry out periodic audits to ensure continual compliance. We will continue to review and update our own practices in line with such organisations as the GLAA (Gangmasters & Labour Abuse Authority)

Further developments

We understand that it is difficult to establish where individuals are being subject to modern slavery, the early warning mechanisms we implemented and that are still in place will assist us in identifying possible abuses, these include;

- **Salaries** – Payments being diverted from individuals and paid to a third party using cash or cheque or being paid via the same bank account
- **Accommodation** - Multiple occupancy at the same address

- **Statutory rights** – lack of understanding of their basic statutory rights such as entitlement to sick pay, holiday pay and other benefits;
- **Fees and Rates** – Very low agency rates;
- **Physical signs** - individuals showing signs of physical or psychological abuse; including unusual behaviours

Training

The organisation continues its awareness programme -

- Posters containing information about Modern Slavery are displayed in notice boards across all sites
- Arrange for all new cattle producers to be issued with information produced by Closer Together to be displayed on farms.
- Working in conjunction with Waitrose suppliers (HR team) to implement measures to raise awareness amongst producers.
- Livestock Field staff have attended the Stronger Together Workshops.
- New starter onboarding documentation contains detailed information regarding The ETI Base Code
- Induction for all new employees contains reference to Modern Slavery and shows the 10-minute video, Tackling Modern Slavery.

Continued Actions

- All farm producers have been issued with a worker code of practice against which they will be audited annually.
- The audits commenced in August 2017 and the results risk assessed as low, medium or high.
- All ingredient and packaging suppliers are Sedex registered.
- Labour providers to the factory are audited twice a year, and must all be registered with the GLAA.
- HR Department checks that the labour providers are registered using the GLAA on-line checking facility.
- Detailed weekly payroll checks for bank accounts and addresses with multiple occupancy

Signed by:



Andrew McAllister
Managing Director
 On behalf of the Board of Directors