



## **Modern Slavery Policy Statement – 2025**

### **Policy Statement**

Dovecote Park is firmly committed to preventing slavery and human trafficking within our business operations and supply chains. By ensuring that every employee is treated with respect, fairness, and dignity, we reaffirm our dedication to eliminating any opportunity for modern slavery to occur within our organisation.

Modern slavery remains one of the most significant human rights challenges in the UK and globally. It is estimated that more than 50 million people worldwide are affected, including over 27 million individuals subjected to forced labour. Women, children, and migrant workers are disproportionately impacted. We recognise the seriousness of this issue and our responsibility to play an active role in combating it.

### **Organisation Structure and Supply Chains**

Dovecote Park is a privately owned meat processing business supplying beef, veal, and venison to Waitrose. We also supply products to brands including Aldi, Burger King, and Marks & Spencer.

Our supply chain spans from livestock farmers through to ingredient and packaging suppliers. While our operations are based solely within the United Kingdom, certain suppliers operate internationally.

### **Risk Assessment and High-risk Activities**

We currently assess the risk of slavery or human trafficking within our direct operations and supply chain as low. However, we remain vigilant and acknowledge that risks can arise in any sector. We therefore continue to monitor our operations and suppliers carefully and take appropriate action where necessary.

### **Responsibility and Governance**

We believe that every employee has a role to play in upholding our anti-slavery commitment. However, specific responsibilities are allocated as follows:

- **Policy Oversight** – The Board of Directors is responsible for drafting and annually reviewing the company’s Modern Slavery Policy.
- **Risk Assessments and Supplier Compliance** –
  - The Purchasing Manager and Technical Manager are responsible for ensuring compliance across all suppliers (excluding livestock).
  - The Agriculture Manager, in conjunction with the HR Manager, oversees livestock producer compliance.
  - These managers jointly conduct investigations and due diligence where concerns or potential breaches under the Modern Slavery Act arise.
- **Training** – Senior managers and the Purchasing Manager have completed Modern Slavery Act training. Producers receive awareness training through Stronger Together workshops during open days.

## **Due Diligence**

We expect all suppliers—and ourselves—to:

- Comply with all applicable laws and regulations
- Provide safe and healthy working conditions
- Treat workers with respect and dignity
- Operate ethically and responsibly

We conduct ongoing risk assessments of all livestock producers. Our Responsible Sourcing Policy, issued to both existing and potential producers, has been updated to include specific questions designed to identify potential indicators of modern slavery.

## **Relevant Policies and Memberships**

Dovecote Park adheres strictly to the Ethical Trading Initiative (ETI) Base Code, which is founded on International Labour Organisation conventions and recognised globally as a benchmark for labour standards.

We are also members of Sedex, a not-for-profit organisation dedicated to improving ethical business practices in global supply chains. All non-livestock suppliers are required to be Sedex registered.

We use only approved and reputable labour agencies. New agencies are subject to verification processes before workers are accepted, and periodic audits are conducted to ensure ongoing compliance. We also align our practices with guidance from the Gangmasters and Labour Abuse Authority (GLAA).

## **Early Warning Indicators**

Recognising that modern slavery can be difficult to detect, we maintain monitoring mechanisms to identify potential warning signs, including:

- **Salary Irregularities** – Wages diverted to third parties, multiple employees paid into the same bank account, or payments made via cash or cheque.
- **Accommodation Concerns** – High levels of occupancy at a single address.
- **Lack of Statutory Awareness** – Limited understanding of rights such as sick pay, holiday pay, and other employment benefits.
- **Unusually Low Agency Rates**
- **Physical or Psychological Indicators** – Signs of abuse or unusual behaviour patterns.

## **Training and Awareness**

We maintain a continuous awareness programme that includes:

- Displaying modern slavery awareness posters across all sites.
- Providing new cattle producers with awareness materials for display on farms.
- Working collaboratively with Waitrose suppliers (HR teams) to raise awareness among producers.
- Ensuring livestock field staff attend Stronger Together workshops.
- Including detailed information on the ETI Base Code in new starter onboarding documentation.
- Incorporating modern slavery awareness into employee induction programmes, including a 10-minute educational video on tackling modern slavery.

## **Ongoing and Continued Actions**

- All farm producers are issued with a Worker Code of Practice and audited annually against its standards.
- Audits commenced in August 2017, with outcomes risk-rated as low, medium, or high.
- All ingredient and packaging suppliers are Sedex registered.
- Labour providers are audited twice yearly and must be registered with the GLAA.
- The HR Department verifies GLAA registration via the official online checking facility.
- Weekly payroll reviews are conducted to identify irregularities in bank accounts and shared addresses.

Signed by:



Andrew McAllister

**Managing Director**

On behalf of the Board of Directors