



MISSION FOODS EUROPE

Human Resources Policies

Title: Modern Slavery	Effective date: June 2016	Scope :
Approved by: Human Resource Manager	Revision Status: A	Page 1 of 3

1.0 Purpose

To ensure that individuals employed by Mission Foods sites in Seaham and Coventry are not subjected to behaviour that would constitute an offence under The Modern Slavery Act i.e. slavery, servitude, forced or compulsory labour or human trafficking.

2.0 Scope

Every individual employed by Mission Foods on a full time, temporary or part time basis including those supplied through Employment Agencies.

3.0 References

The Modern Slavery Act 2015

4.0 Definitions

Definition of Slavery

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom.



Definition of Servitude

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the International Labour Organisation's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.

5.0 Procedure

5.1 Data Recording

- Hiring and labour turnover
- types and duration of contracts
- age and sex profiles
- percentage of migrant workers
- hours of work and wages
- Leave (annual and maternity)

5.2

• Recruitment Process

- Work closely with recruitment agencies, carry out regular audits on their processes, contacts reviewed by legal team, review fees paid



5.3

- New Starter Documentation
 - Right to work – passport/Full Birth Certificate and NI number/Work Permit
 - Employees own bank account details

5.4

- Induction
 - Slide
 - Induction Video
 - Workers Questionnaire

5.5

- Grievance Procedures
 - Giving a voice to workers through grievance procedures
 - Grievances are resolved through collective bargaining using trained senior managers to intervene and deal with the issue sensitively but decisively.

5.6

- Whistleblowing Policy
- Working in partnership with Stronger Together
- Sedex Audits
- ETI Base Code displayed
- Poster Campaign