

## Slavery & Human Trafficking Statement

### 1.0 INTRODUCTION

Muntons has been producing malt and malted ingredients for almost a century. The Company is a significant international player in the supply of malts, malt extracts, homebrew kits for beer and wine, flours and flakes and many other malted ingredients relevant to the food and drinks industry, exporting around half of its production.

As required by the Modern Slavery Act 2015, this statement describes the steps which the Company has taken to ensure that slavery and human trafficking is not taking place anywhere in our own business, or in any part of our supply chain. The Company has also made an ongoing commitment to support the principles of the Act and to remain vigilant to identify, prevent and mitigate any actual or potential impacts of slavery and human trafficking throughout our supply chain and our own business.

Sustainability and ethical trading are the common objectives that links all aspects of Muntons business activities. Our aim is to minimise the impact of our business activity on the environment wherever possible. This is achieved by talking with our suppliers to ensure that they likewise take their corporate social responsibility seriously. Muntons has an underlying and long-standing commitment based on the belief that business can be both profitable and responsible. This is achieved by building long-lasting relationships with our employees, across the supply chain and with the local community.

### 2.0 EMPLOYMENT PRACTICES

- 2.1 Muntons plc and its group companies operate in full compliance with the employment legislation relevant to each country of operation (e.g. UK, Europe, USA, South East Asia). The Company has extensive employment documentation which details the terms and conditions under which employment and behaviours are governed.
- 2.2 We confirm that:
- All workers are employed at their own free will and not under any compulsion to work for Muntons.
  - All workers also have the freedom to terminate their employment at any time with reasonable notice where applicable.
  - No fees are charged to workers for recruitment and no identity or travel documents are held to bind workers to employment or restrict their freedom of movement.
  - All workers are provided with the appropriate employment documentation (e.g. offer letters or contracts) detailing their terms of employment, hours, wages and working conditions etc.
  - Muntons operates fair and just treatment of all workers through structured performance management assessment and adopts disciplinary policies which are fair and humane and provides details of such policies to its workers.

- Muntons has and operates an Equal Opportunities policy to provide equality of opportunity to all workers and job applicants and aims to create a working environment in which individuals are free from discrimination and harassment. We do not discriminate against workers on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, religion or belief, sex or sexual orientation. The principles of non-discrimination and equality of opportunity also apply to the way in which workers treat visitors, clients, customers, suppliers and former employees.
- All workers are directly paid at least the minimum wage and legally mandated benefits required by applicable laws. Wage payments are made at regular intervals, normally monthly or semi-monthly with all non-statutory deductions being agreed in advance with the worker (e.g. pension contributions, loan repayments etc.)
- Working hours are agreed in advance and no workers are forced to work excess hours above their contracted requirement or those above national law. All overtime worked is on a voluntary basis.
- All workers have freedom of movement and are not physically confined to the workplace or related premises.
- Muntons operates a robust and effective grievance procedure and where appropriate every employee receives a copy of our employee handbook applicable to their country of employment.

### 3.0 SUPPLY CHAIN RELATIONSHIPS

- 3.1 Muntons aims to impose the same principles to fair employment practices across its supply chain and only engages suppliers who work to the same ethical standards. We look to source goods and services from reputable and recognised organisations, vetting suitability wherever practicable. We play an active role in supplier development, communicate our expectations and work closely with them to ensure those expectations are met.
- 3.2 Our key suppliers are crucial in helping us operate our business enabling us to deliver an efficient and quality service to our customers. We tend to foster long-term relationships with these first tier key suppliers who understand and share our business and operational values and avoid making demands of our suppliers that might lead to them violating human rights.
- 3.3 We have due diligence processes in place in respect of our procurement which requires potential suppliers to demonstrate their commitment to ethical trading and show they understand and effectively manage their own supply chains. Our key suppliers are required to complete a sustainable supply questionnaire that is modelled on the Suppliers Ethical Data Exchange (SEDEX) code. They must satisfy at least our base standard before they are permitted to supply.
- 3.4 Muntons will NOT support sourcing goods or services where the minimum legally required standards (be they national or international) are not applied. Where, for whatever reason, minimum standards are temporarily absent, Muntons will work with the supplier to ensure the implementation of corrective actions, but if the situation persists or is incapable of remedy, it will terminate the contract without further notice even if it causes short-term supply disruption.

#### 4.0 SUPPLIER ETHICAL DATA EXCHANGE (SEDEX)

- 4.1 Muntons are members of the Supplier Ethical Data Exchange (SEDEX) scheme and have been successfully audited to the SMETA four pillar audit which ensures our practices in the areas of Labour and Welfare; Health and Safety, Environment and Business operations are scrutinised against the Ethical Trading Initiative (ETI) base code.
- 4.2 Muntons chooses to be re-audited every two years to ensure we remain compliant with the SMETA standard.
- 4.3 Muntons SEDEX SMETA audit reports and company data in the four pillar categories can be viewed through the SEDEX website by existing members using our company code: ZC1030811. We can also provide electronic copies for review to non-members of SEDEX.

#### 5.0 PREVENTING MODERN SLAVERY – MITIGATING THE RISKS

- 5.1 In order to assess the effectiveness of the measures taken by the Company we will review the following key performance indicators and report on them in future Slavery and Human Trafficking Statements.
- Ensure staff training for employees involved in procurement, human resources and supply chain on issues of legal compliance including modern slavery and human trafficking.
  - Appropriate action will be taken to strengthen supply chain auditing and verification (e.g. all key suppliers will receive a copy of our statement so that they understand Muntons position on modern slavery.
  - Steps will be taken to identify our high risk suppliers, and their ability to detect and mitigate modern slavery risk in their own supply chains is assessed; and
  - Investigations are undertaken into any reports of modern slavery and remedial actions are taken in response.

#### 6.0 REVIEW OF OUR PRACTICES

- 6.1 This Statement will be subject to an annual review and evaluation.

#### 7.0 SIGNATURE

I hereby confirm that that the information contained in this statement has been approved by the Muntons plc Board

Signed:  ..... Date: 16/4/19. ....  
Director