



MODERN SLAVERY STATEMENT

Introduction

BAKO North Western Group Limited ('The Company') has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all of our business dealings and relationships consistent with our obligations under the Modern Slavery Act 2015.

We endeavour to implement and enforce effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our own business or any of our supply chains.

We also expect the same high standards from all of our suppliers, contractors and other business partners.

Business Structure and Supply Chains

BAKO North Western Group Limited is a Foodservice Wholesale and Distribution Company specialising in frozen, chilled and ambient Bakery Supplies, including a range of own brand goods. We have around 270 employees.

We operate nationwide with three regional trading companies:

- BAKO North Western Limited
- Bakers (Area 1) Limited
- BAKO South Eastern Limited

Other subsidiaries:

- LBBA Ltd (Dormant)
- BAKO Scotland Ltd (Dormant)
- BAKO Ltd (Dormant)
- Anglian Bakery and Catering Supplies Ltd (Dormant)
- BAKO Group Ltd
- Sandco 1187 Ltd
- BAKO Northern (Holdings) Ltd

We deliver goods using our own multi-temperature distribution fleet. Most of our products are sourced from the UK.

Policies

The Company has several policies that describe our approach to the identification of modern slavery risks and prevention of modern slavery in any parts of the business:



- **Anti-Slavery and Human Trafficking Policy** - a policy designed to provide information on the Company's zero-tolerance approach to modern slavery and provide guidelines to the Management team on expectations from any interested parties to maintain a consistent standard throughout all supply chains. This policy was first written by BAKO in 2015 and developed further in 2018.
- **Ethical Policy** – the Company wrote this policy to outline its commitment to deliver product which has been sourced both ethically and responsibly. Compliance to the requirements set out within this policy is expected from all suppliers and monitored through our comprehensive supplier approval process. In addition, BAKO hold a SEDEX membership and provide total transparency of our current ethical stance to all related customers and suppliers.
- **Whistleblowing Policy** – The Company has a Whistleblowing Policy in place to enable employees to disclose details of any fraud, misconduct, bribery or other wrongdoing without fear of reprisal, so that problems can be identified and resolved quickly.
- **Recruitment Policy** – the recruitment process is usually handled internally by the HR Department and line manager of the department seeking a new employee. Job offers are made based solely on the applicant's abilities, qualifications, experience and merit as measured against the job description and person specification. Any offer of employment is conditional on documentary proof of qualifications and eligibility to work in the UK being provided.

Due Diligence

Recruitment

All staff employed by the Company to work on a temporary, permanent or fixed-contract basis are subject to a right to work check in accordance with UK legislation and are not able to commence work unless the Company is satisfied that they are able to work legally within the UK. The Company endeavours only to use Employment Agencies who ensure that strict compliance checks are carried for all candidates that it supplies.

Whistleblowing

If any member of staff believes or suspects a breach of the Anti-Slavery and Human Trafficking Policy has occurred or may occur, they must notify their Line Manager or report it in accordance with the Company's Whistle Blower's Policy. All staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chain as soon as possible.

Risk

The Company have a comprehensive risk management process in place to identify new and monitor ongoing existing risks associated with the business and its core activities, taking into account our compliance obligations. There is a designated risk committee with expertise in Finance, HR and Food Safety, and all identified risks have mitigation plans recorded and are monitored consistently.



Risk Assessment

New and existing suppliers are measured for compliance via our Supplier Approval Process, which requires all suppliers to complete a detailed questionnaire. This allows for identification of potential risks within the supply chain in relation to slavery and human trafficking.

No instances or indicators of modern slavery have been identified in the financial year ended March 2020.

Training

All Company Policies are made available to employees via our Intranet and can be referenced at any time. When a company policy is updated the document is circulated among all employees for awareness training. In addition, the Company's Anti-Slavery and Human Trafficking Policy can be accessed by all interested parties via our website.

Next Steps

The Company recognises that modern slavery and human trafficking risks remain prevalent within our industry, and there is always continuous improvement to be made to our business activities in order to raise awareness and help to reduce these risks further.

We understand that risk varies dependant on geographical location of suppliers we work with and types of product sourced, and our main method of risk assessment is through our Supplier Approval Process.

With this in mind, BAKO North Western Group Limited will endeavour to review the effectiveness of the Supplier Approval Process at regular intervals and make improvements where requirement is identified.

In addition, we will continue to review effectiveness of our internal policies and procedures to ensure our ability to identify and manage any modern slavery and human trafficking risks within our supply chains, by raising employee awareness and alerting our own suppliers and customers to possible risks within their own supply chains.

Board Approval

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's Modern Slavery Statement in respect of the financial year ended 31 March 2020. It was approved by the Board and has been signed by a Board Director.

Name: Joseph Hall

Title: Director

Signature:

A handwritten signature in black ink that appears to read "J Hall".

September 2020