



Our commitment to our ethical working practises

The following is the second statement given by Valeo Foods UK (the trading name of Rowse Honey Ltd), in compliance with the UK Modern Slavery Act (MSA). The Statement provides an insight into the steps our organisation has taken since the implementation of our Ethical Working Policy in October 2016 and describes the next steps to further exclude and prevent slavery and human trafficking from our business and supply chain. This is an ongoing commitment with a longer-term vision.

Where we use the term “modern slavery” in this Statement, it has the meaning given in Annex 1 of the [Statutory Guidance](#) for the MSA, and includes the offences of slavery, servitude, forced or compulsory labour, and human trafficking.

What we have done so far

We have implemented our Ethical Working Policy and amended the re-approval process we apply to existing suppliers. This included, requesting that existing suppliers register with and submit updates to Sedex, as well as asking them to provide information about how they are managing modern slavery risks within their own supply chains.

99% of the suppliers that were asked to submit an SAQ as part of this re-approval process responded. Of those suppliers, 54% stated that they have incorporated the Modern Slavery Act into their current company policies and procedures; 55% stated that they adopt a due diligence approach towards any new suppliers to ensure their compliance to the Act, prior to entering into new supplier agreements, and 60% stated that their senior management commit to apply the terms of the act and ongoing governance throughout their business and supply chain.

Since implementation, the Technical team have audited 85% of our supply base to confirm compliance.

For new suppliers, the company adapted the SAQ to incorporate elements to satisfy our commitment to the Modern Slavery Act. This included a supplementary ethical SAQ which incorporates all aspects of the Ethical Trade Initiative (ETI) base code, along with encouragement to become Sedex Members.

What we are working on now

We plan to build on the processes that are now in place, and to further encourage new and existing first and second tier suppliers to register to Sedex.

In 2016, we commissioned third-party experts, Verisk Maplecroft, to conduct a high-level risk assessment of the countries in which our Suppliers are located ('Supplier Countries'). The assessment used a well-established database of human rights indices to analyse the exposure of Supplier Countries to modern slavery, including forced labour, child labour, trafficking in persons, working conditions, migrant labour and the illicit economy.

We will continue to use this risk-assessment tool to audit our supply chain further, to allow for a greater insight of their Modern Slavery compliance. In the meantime, we are linking with our supply chain at a multi-tiered level in preparation for future action.

Future commitment

It is our aim to replace our current method of risk assessment with the introduction of the Sedex risk assessment. This will allow for sight of our suppliers ethical SAQ's at a multi-tiered level. These SAQ's are used to risk assess their site for compliance based on the answers given, along with the consideration of the location and profile of the site itself. This risk assessment tool will give us a greater insight to our supply chain to allow for a more consistent, controlled approach to the audits undertaken by the business.

MDSA - Initial Statement 2017

The structure of our business & supply chain

Valeo Foods UK refines, and bottles honey, pasteurises maple and agave syrups; lemon, orange and passion-fruit curds; and fruit, salted caramel, dark chocolate and toffee sauces. In addition to supplying supermarkets for consumer purchase, we also provide bulk orders to restaurants, caterers, and wholesale and manufacturing companies.

Our head-office is in Wallingford, Oxfordshire, where we have circa 270 employees. Our parent company, Valeo Foods Group, is based in Dublin in the Republic of Ireland.

We source raw materials from a global network of approximately 150 product-based business partners, including direct suppliers ('Suppliers') and agents. They provide:

- Honey, maple and agave syrups
- Raw materials required to produce fruit curds and sauces
- Glass and plastic retail packaging – as well as bulk packaging
- Sub-contracted packaging services

Business Partner interactions

We work with our customers to ensure we fully comply with their customer codes of conduct, which results in a stronger, unified and robust approach to supply chain working practices.

Policies in relation to slavery and human trafficking

In October 2016, we adopted an Ethical Working Policy ('Policy'). The Policy reflects our commitment to taking action to minimise the risk of modern slavery within our business and supply chain – and to encouraging appropriate working conditions amongst workers within our field of influence.

Under our Policy, we are committed to a number of actions, ranging from due diligence of new Suppliers, to the facilitation of reporting of actual or suspected cases of modern slavery in our business or supply chain.

The Policy was approved by the Managing Director. Responsibility for its implementation is shared by the Operations Director and the Procurement Director:

Due diligence processes in relation to slavery and human trafficking

We ensure that our Business is free from modern slavery by applying our Ethical Trading Framework. This Framework sets out nine provisions which are written in line with the [ETI Base Code](#) (covering issues ranging from freedom of association to child labour). It also includes an additional provision on our compliance with immigration law and indirect recruitment.

The application of the Framework is supported by our compliance with national law and the implementation of responsible human resource processes. These include, for example:

- Appropriate checks to validate eligibility to work in the UK
- Prohibition on workers being asked to lodge “deposits” or identity papers with the business
- Respect for workers right to freedom of association
- Health and safety training for new employees
- An hourly rate of pay in excess of the National Minimum Wage regulations for that country
- Employees are not forced to work more than the recommended weekly hours (as defined by local or national regulations for that country), on a regular basis and all overtime is voluntary
- All of our employees and workers have access to a confidential internal whistleblowing procedure and independent hotline, in addition to a formal human resources grievance mechanism. All employees and workers raising actual or suspected cases through these means are protected from retaliation
- Furthermore – and in line with national law - we only use employment agencies licensed by the United Kingdom’s Gangmasters Licensing Authority. This helps ensure adequate oversight of the recruitment of indirectly-hired workers

Rowse Honey shares the ethical audit data of its Business and Suppliers with its customers through [Sedex](#), as both a Buyer and Supplier. This approach will continue in line with our statutory obligations and good working practices, whilst taking into account implications and modifications necessary as Brexit obligations evolve.

External certification

Some of our honey product lines are externally audited and have received Fairtrade certification. A [Fairtrade certification](#) means that the trader or producer has been audited and assessed with regard to their awareness of the applicable labour laws in their country and the fundamental ILO conventions; as well as any indications that the Supplier violates these laws or conventions.

Performance outcomes

In the reporting period, we have not identified any actual or suspected cases of modern slavery in our business or in our supply chain. Under our Policy:

- We will terminate relations with any Supplier found to have been knowingly, cynically and persistently benefiting from modern slavery.
- We will require a Supplier to rectify the situation if a Supplier is found to be unknowingly benefiting from modern slavery, or where in good-faith Suppliers self-report newly discovered cases of modern slavery. Where Suppliers are unwilling or lack capacity to prevent the repetition of violations, we will consider terminating the relationship.

Beyond this, we are exploring additional key performance indicators (based on future Sedex submissions and ethical audits) by which we can assess and support supplier compliance with our Policy in a more proactive way.

Provisions of agency workers & their obligations

As an employer committed to the eradication of forced labour throughout our supply chain, we endeavour to only business partner with labour agencies who are registered with the Gangmaster Licence Authority (GLA). To check their compliance, we undertake bi-annual audits which follow the ETI principles.

Staff training activities

We have made all our relevant managers and technical department staff fully aware of the Policy and its associated procedures and processes. New employees are informed of this during the first week of their employment with the company.

We ran a training workshop in the first year of implementation and will continue this for new employees entering into the business.

Furthermore, we are making every effort to ensure our employees are aware of the mechanisms available to them to register grievances or to report suspected incidents of modern slavery. In the United Kingdom, we publicise the official 24-hour [Modern Slavery Helpline](#). We are also encouraging our Suppliers to publicise this helpline in the UK - or equivalent helplines within their own countries of operation where available.

Signed and authorised by:



Managing Director

02nd November 2018