

**OLIVER KAY LIMITED**  
**MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2015/2016**



**This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015.  
It sets out the steps taken by Oliver Kay Limited during the year ending 30th June 2016 to prevent modern slavery  
and human trafficking in its business and supply chains.**

**INTRODUCTION**

The International Labour Organisation (“the ILO”) estimates that almost 21 million people worldwide are victims of forced labour; almost 19 million of those victims are exploited by private individuals or enterprises, generating US\$ 150 billion of illegal profit per year<sup>1</sup>. In response to this atrocity, the United Kingdom Modern Slavery Act 2015 requires larger companies to publish an annual report setting out what, if any, steps they take to ensure that slavery and human trafficking is not taking place in any of its supply chains or in its own business<sup>2</sup>. There have been many well reported instances of slavery globally in the farming and agricultural industry including in the UK. We have a zero tolerance approach to modern slavery and human trafficking within our own operations and our wider supply chains.

**OUR BUSINESS**

We are a wholesale supplier of chilled fresh produce, dairy, delicatessen, ambient and frozen products serving our customers in the food service and catering industry throughout England, Wales and Scotland. We also act as a distributor of third party owned food products which we deliver to some of our customers to reduce the carbon footprint of the supply chain to the customer. Our main depot is in Bolton where all our customer orders are picked and then the goods are distributed in delivery vehicles to customers. In some cases, delivery is effected via our satellite distribution hubs in Carlisle, Birmingham and London which gives us the ability to serve customers nationally. We have approximately 2,266 customers in England, Wales and Scotland including: Michelin starred restaurants, contract caterers, hotels, pubs and the education, sports and leisure sectors.

**ORGANISATIONAL STRUCTURE**

Our immediate parent company is Oliver Kay Holdings Limited. Our ultimate parent company is Bid Corporation Limited whose registered office is in South Africa. As at the year ending 30<sup>th</sup> June 2016 our annual turnover was £48,013,472 (gross) and £45,130,460 (net) and we had 287 employees.

**OUR SUPPLY CHAINS**

As at 30<sup>th</sup> June 2016, we had approximately 304 suppliers who we purchased products from for re-sale. We buy products from many local growers especially during the summer months and the majority of the products we purchase are from the European Union. We predominantly buy products from growers and agents in the UK or the EU. We only have one direct (known as “tier one”) supplier outside of the EU which is in Israel. At this stage, we do not fully understand the extent of our supply chains as we have not started the mapping process but this will be completed within the next financial year. Where we purchase products directly from local growers there is only one tier involved in the supply chain which will make the process of mapping our supply less complex for these suppliers. In some of the instances where we purchase products from growers and agents in the EU there will be a few tiers in

the chain before the products reach us which will make the mapping process more complex for some of our suppliers. We estimate that approximately 20 per cent of the products that we sell originate from outside the EU.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to the respect of workers' rights in our own business and throughout our supply chains, with a primary focus on the abhorrent abuses of slavery and human trafficking. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking are not taking place anywhere in our own business or supply chains.

## **STEPS TAKEN**

1. We send our produce suppliers a Supplier Approval Questionnaire to complete before we commence trading which asks if the supplier has an ethical sourcing policy;
2. Some of our employees have attended training courses on modern slavery and human trafficking; and
3. Our employees have access to a confidential telephone number to call, anonymously if they wish, 24 hours a day, 7 days a week, to report any ethical concerns including modern slavery or human trafficking.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we intend to put systems in place to:

- Improve our Supplier Approval Questionnaire by raising more ethical trade questions to gain further information;
- Map our supply chains;
- Identify and assess potential risk areas in our supply chains and grade all our suppliers with a risk rating of high risk (red), medium risk (amber), or low risk (green);
- Use the risk assessment results to mitigate the risk of slavery and human trafficking occurring in our supply chains and our own business;
- Identify and assess potential risk areas in our own business such as the use of agency workers;
- Monitor potential risk areas in our supply chains and own business; and
- Protect whistle blowers.

## **MONITORING**

Once we have undertaken the initial stage of the supply chain mapping process we intend to use a Risk Assessment Tool endeavouring to continually increase the transparency we have on all our suppliers in the chain. The results from this on-going supply chain mapping process (as our suppliers change over time) will be discussed at board meetings.

When we become an Ethical Trading Initiative ("ETI") Foundation Member, in the next financial year, we will be required to improve working conditions throughout our supply chains through the adoption of the ETI Base Code and in order to comply with our membership we will be required to submit a report to the ETI after our initial 24 months of membership (and thereafter on an annual basis), that describes the measures we are taking in order to achieve this.

## **ACTION AND RESPONSES TO SLAVERY AND HUMAN TRAFFICKING RISKS**

Our aim is that through demanding complete transparency from our suppliers and by providing them with the knowledge and training they require (where appropriate) we can ensure that the abhorrent practices of modern

slavery and human trafficking are not tolerated at any level of our supply chains. We are committed to helping suppliers remediate certain situations where their treatment of workers has fallen below the minimum standards that we expect. For example, where excessive hours are being worked or where workers are not being provided with a rest break. In those circumstances, we would seek to educate and train the supplier and then undertake further monitoring. We will only walk away from a supplier as a last resort if no improvement has been shown where we have detected a problem and taken steps to try and get the supplier to meet our minimum standards. However, for the most serious cases of slavery (such as where workers have had their passports confiscated and are forced to work for no pay in terrible conditions) we would immediately stop purchasing products from such a supplier. Such abuses are too serious to tolerate. We appreciate that we hold more power to ensure workers' rights are protected when we are in a commercial relationship with a supplier but there is a line that if crossed we must step away and terminate a supply contract. It is a question of degree and we will consider each situation carefully to determine the most appropriate response.

## **TRAINING**

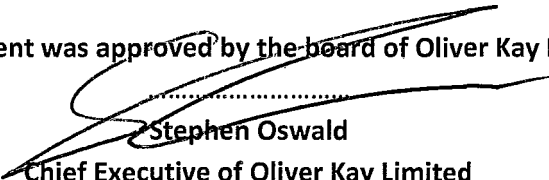
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, in 2015/2016, our legal team attended training courses such as The ETI UK Base Code and UK Law and courses on the Modern Slavery Act 2015 which were run by external law firms. Our Head of Health & Safety and Food Safety has also attended various training courses run by the ETI.

## **FURTHER STEPS**

We intend to take the following further steps to combat modern slavery and human trafficking:

1. We have developed an internal training presentation which will first be given to Technical Managers, Senior Managers and buyers before being rolled out to all our employees and workers so that everyone will receive training on modern slavery and human trafficking, how to spot it and who to contact with any concerns;
2. Join the ETI as a Foundation Member;
3. Prepare an Ethical Trading Policy to incorporate the ETI Base Code to be sent to our suppliers and added to our website;
4. Add our Anti-Slavery and Human Trafficking Policy to our website and ensure it is sent to all our customers, suppliers, employees and workers and is made available to our contractors;
5. Start to map our supply chains and develop a risk assessment tool to enable us to grade our suppliers into low, medium or high risk;
6. Improve our Supplier Approval Questionnaire to add further questions about modern slavery and human trafficking;
7. Carry out physical audits of our suppliers or instruct an independent auditor to audit certain suppliers against key performance indicators in relation to certain geographical areas or product types that we consider to be high risk arising out of our risk assessments;
8. Arrange audits of our own business regarding modern slavery, human trafficking and ethical trade in general; and
9. Add terms and conditions to our standard supplier contracts relating to ethical trade.

**This statement was approved by the board of Oliver Kay Limited.**

  
**Stephen Oswald**  
**Chief Executive of Oliver Kay Limited**

**31<sup>st</sup> December 2016**

## **REFERENCES**

<sup>1</sup> <http://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>

<sup>2</sup> <http://www.legislation.gov.uk/ukpga/2015/30/part/6/enacted>