

Castell Howell Foods

Anti-slavery and Human Trafficking Transparency Statement



2023-2024

Introduction

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a slavery and human trafficking statement for each financial year of the organisation.

Castell Howell Foods Limited is committed to conducting its business operations ethically and with integrity. We recognise the importance of respecting human rights and preventing modern slavery within our supply chains and operations. We are taking all reasonable steps to prevent the exploitation and abuse of men, women and children at all stages within our supply chain in full support of and compliance with the provisions of the Modern Slavery Act 2015. This transparency statement outlines the steps we are taking to address the risks of modern slavery and human trafficking in our business.

Organisational Structure

Castell Howell Foods Limited, which includes our associated companies Celtica Foods, Farm Fresh Foods, Celtic Coast Fish and Llandeilo Bakery, operates from nine UK sites. The main offices, warehouse and distribution depot, Farm Fresh Sandwich Fillings and Celtica Foods are based in Cross Hands, while Farm Fresh Cooked Meats and the Cash and Carry are based in Carmarthen. We also operate from satellite depots in Merthyr Tydfil, Avonmouth, St. Martin's and Porthmadog. Our Celtic Coast Fish Company is based in Pontyclun.

The turnover for the financial year 2022-2023 was £202 million.

Our supply chains

The Company's main business is derived from the purchase and resale of food products from a wide range of suppliers. The majority of those suppliers are based in the United Kingdom, which are regulated by UK legislation in terms of acceptable working conditions, adequate Health and Safety procedures, Working Time Regulations and in compliance with Human Rights legislation. In some circumstances, we purchase products through brokers based in the UK or Europe, whose suppliers may be based outside the UK or the EEC, and may include the following countries: -

Spain	Australia	Ukraine
France	New Zealand	Philippines
Greece	China	Papua New Guinea
Italy	Thailand	Ecuador
India	USA	Brazil
Germany	Vietnam	Paraguay
Belgium	Turkey	Russia
Hungary	Egypt	Romania
The Netherlands	South Korea	Bulgaria
Poland	Lithuania	Sri Lanka

Our Policy

Modern slavery is a crime resulting in the abuse of the human rights of vulnerable workers taking various

forms, such as slavery, servitude, forced or compulsory labour and human trafficking. We have a zero-tolerance approach to modern slavery and are committed to acting ethically, with integrity and transparency in all of our business dealings and relationships. We are committed to implementing and enforcing effective systems of control to ensure that modern slavery and human trafficking are not taking place anywhere within either our own business or in any of our supply chains, consistent with our obligations under the Modern Slavery Act 2015.

We have developed and implemented policies and procedures to prevent modern slavery in our operations and supply chains, which includes:

1. An Anti-slavery and Human Trafficking policy, outlining our expectations regarding ethical business practices. We are proud of the conditions of employment that we provide our 850 employees. Our employees are paid at a rate equivalent to, or higher than that of the National Living Wage and their contracts and hours of work are in accordance with the provisions of the Working Time Regulations.
2. Supplier agreements that require compliance with anti-slavery and human trafficking laws. We expect the same high standards from all our suppliers, contractors and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of modern slavery, and expect that our suppliers will in turn hold their own suppliers to the same standards.

We challenge our suppliers to ensure that slavery and human trafficking does not exist in any part of their business or supply chains, by assessing current measures and by determining any further measures that may be required.

3. Whistleblowing mechanisms to encourage reporting of any suspected cases of modern slavery. Our whistleblowing policy supports the Modern Slavery Act by encouraging staff to report suspected breaches of our policies in the knowledge that their concerns will be taken seriously and investigated as appropriate.

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of unknowingly harbouring illegal or unethical conduct, so a culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

Due Diligence processes

As part of our commitment to the Modern Slavery Act 2015, we continue to obtain the signatures of our suppliers on the Company MSA 2015 Supplier Declaration form. By signing this, each supplier confirms their commitment to: -

- Produce and publish a Modern Slavery transparency statement, if required by the criteria of the Act;
- Produce a Modern Slavery policy appropriate to the business;
- Commit to due diligence procedures with respect to slavery and human trafficking in the selection of their suppliers;
- Include anti-slavery and human trafficking considerations in their resourcing strategy and employment terms; and
- Ensure the commitment of Senior Management to the significance of the Modern Slavery Act 2015.

In addition, new suppliers are assessed through completion of the Company 'Assessment Questionnaire for Suppliers', which comprises of questions pertinent to the provisions of the Act and suppliers are required to provide us with their Company policies in relation to Anti-Slavery, Human Trafficking and Ethical Trading.

Risk

Our due diligence process focuses on suppliers in high-risk areas and countries that have lower social and environmental standards than in the UK and EEC. If any irrevocable failing is identified through the assessment questionnaire for suppliers, where possible the supplier-customer relationship will be terminated.

We also take a number of steps to mitigate the risk of modern slavery occurring in our own operations:

- Training - We provide training to our purchasing staff and those who are responsible for the management of our supply chain to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and within our organisation.
- Right to Work Checks - Right to Work checks are completed for all employees upon commencement of their employment with us.
- Whistleblowing - We protect whistle-blowers by providing a clear and confidential reporting line for the disclosure of any breaches of our policies, safe working procedures or legislation. Any concerns will be fully investigated by the Whistleblowing Officer and acted upon accordingly.

Castell Howell is dedicated to eradicating modern slavery and human trafficking from its operations and supply chains. We recognise the importance of transparency and accountability in our efforts and will continue to take proactive steps to combat these intolerable practices.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Castell Howell Foods Limited Slavery and Human Trafficking statement for the current financial year.

Signed on behalf of the Board of Directors



Matt Lewis
Managing Director