



Modern Slavery Policy

January 2017

Brakes is fully committed to ethical and humane working practices, and regards inhumane conditions such as slavery and exploitation as completely unacceptable.

Given our global reach, we also recognise our responsibilities and encourage our suppliers to operate in a way that minimises their impact on the local environment and protects the welfare of those employed by them.

This policy sets out Brakes' approach to Anti-Slavery, Human Trafficking and ethical trading. The provisions in this policy apply to all colleagues, workers, contractors, suppliers and other business partners.

Understanding Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships; to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This policy sets out the provisions that Brakes have in place to identify, understand and prevent the risk of slavery or human trafficking in its own business and its supply chains.

General principles

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers to hold their own suppliers to the same high standards.

Prevention of slavery and human trafficking in Brakes

In order to detect and prevent acts of slavery within our own business, we have a number of policies and practices in place.

Right to Work Checks

All colleagues employed by Brakes to work on either a temporary, fixed term or permanent basis are subject to a right to work check in line with the provisions of the UK legislation. A person is unable to commence work for Brakes unless they satisfy us that they are legally able to work within the UK.

All recruiting managers must ensure that they undertake the right to work check during the interview process and that an offer of employment is only made once it has been confirmed that the prospective colleague is able to legally work in the UK.

Should it subsequently transpire a colleague used false documentation to satisfy the right to work check, the appropriate action will be taken under the disciplinary policy which may include dismissal.

Resourcing

Where Brakes employs the services of an employment agency to source candidates for permanent or fixed term positions, we endeavour to only use agencies of good repute and who are listed on our preferred supplier list. Whilst Brakes expect the agencies to undertake the appropriate background checks on prospective colleagues, recruiting managers must still conduct the right to work check and be satisfied of the candidate's legal right to work in the UK prior to an offer of employment being made.

Agency Workers

Where Brakes uses temporary workers supplied through an employment agency, we expect and require that the agency has undertaken the appropriate checks. We operate a preferred supplier list for these agencies and those listed are expected to adhere to our standards on the prevention of slavery and human trafficking.

In the event that Brakes identifies that an employment agency is not adhering to our standards, the agency will be removed from the preferred supplier list and will not be engaged in any further recruitment activity on any basis.

If a recruiting manager believes that an employment agency is not adhering to Brakes' standards, they should inform their HR Business Partner immediately so the appropriate action can be taken.

Whistleblowing policy

We are committed to conducting our business with honesty, integrity, and accountability and we expect all colleagues to maintain these high standards and encourage a culture of openness and accountability in order to prevent and/or to address issues when they do occur. Therefore, we expect any colleague who has concerns about any aspect of our work including our provisions for anti-slavery and human trafficking, both internally and within our supply chain, to disclose their concerns in accordance with the whistle blowing policy, which is available on e-vista.

The whistle blowing policy applies to all employees, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers or any other person associated with Brakes.

Prevention of slavery and human trafficking in Brakes' supply chains

Brakes will never knowingly accept food products from suppliers who exploit the people or natural resources of their environment. To this end, if Brakes becomes aware of any concerns with one of our suppliers we will investigate and determine whether these concerns are justified, and take the appropriate action to address the issues. This could involve working with the supplier to agree an action plan to address the issues, delisting the supplier, and/or sourcing product from an alternative supplier, all dependent on the nature and severity of the concerns.

Brakes has an ethical trading policy that is detailed in its 'Working with Us' document which all suppliers of Brakes products must adhere to. It is based on the standards set by the Ethical Trade Initiative (ETI) and reflects the key elements of the International Labour Organisation (ILO) conventions.

Brakes recognises the importance of establishing trustworthy supplier relationships and continues to develop clear ethical standards to ensure our suppliers can demonstrate that they have taken all reasonable efforts to assess the vulnerability of their individual supply chains to poor ethical conduct, including modern day slavery and deceptive work practices.

Our current approach involves gathering information on a prospective new suppliers' ethical controls through a supplier self audit questionnaire (SAQ). This is assessed by the Technical Manager responsible for that supplier and any further action required is determined based on the risks identified. Should our Procurement and Technical teams decide to progress with them as an own brand supplier, our Technical Manager will verify this information during the visit undertaken to the site that forms part of our formal approval process. The ethical working practices will continue to be reviewed on subsequent visits.

As part of this process, colleagues who work as part of supplier facing functions are required to highlight any potential ethical issues that they may identify in their dealings with suppliers and raise these with their line manager, who will take the appropriate action.

In particular, those colleagues who regularly undertake visits to suppliers are expected to look out for any signs of unethical practices and many of our colleagues have received training on this. We will consider the effectiveness of this as part of our review of the management of ethical trading.

Our risk framework, against which all new suppliers will be assessed and existing suppliers measured for compliance, determines the level of ethical risk at each stage of the supply chain. Effective escalation processes are in place to support decision making should we become aware of non-compliance. Suppliers are required to undertake an independent ethical audit of their full supply chain should it be deemed necessary by risk assessment. The outcome of such an audit is used to determine whether we will work with a supplier.

Supplier's ethical performance will be monitored on an ongoing basis at a frequency determined by the level of risk and vulnerability within their supply chain.

We will continue to review the effectiveness of these controls in reducing the risk of unethical practices.

Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under their control comply with it.

The Group Secretary and General Counsel and the Group HR Director have primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance with the Policy

Colleagues must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager or the Group Secretary and General Counsel or the Group HR Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager, the Group Secretary and General Counsel or the Group HR Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group HR Director immediately. If the matter is not resolved and you are a colleague, you should raise it formally using our Grievance Procedure.

Communication and Awareness of the Policy

Training on this policy and on the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us. Regular updates and/or training through webinars will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breach of the Policy

Any colleague who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Further information

Brakes will review policies and procedures periodically to reflect changes in legislation and good practice.

This policy applies to all colleagues, agency workers and self-employed contractors. This policy does not form part of your contract of employment and we may amend it at any time.

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