



Silbury Marketing Limited
Ethical & Corporate Social Responsibility incorporating Modern Slavery Act (2015)

Silbury Marketing Ltd (“Silbury”) supports in its actions the Modern Slavery Act 2015, in the areas of human and labour rights, environment and anti-corruption, and we perceive this as a powerful platform for our activities within sustainability.

Silbury is a small employer with 24 employees based in 2 locations in the UK. We outsource our payroll function to external Chartered Accountants to ensure we are up to date with the regulations such as National Minimum Wage. Salaries are paid into named bank accounts. We do not employ casual staff or pay wages in cash. When required, temporary staff are found using a bona fide employment agency. Silbury are also certified as complying with the Workplace Pension directive, another check on our employment credentials.

Silbury are registered members of SEDEX, a global membership organization, to manage our performance around labour rights. We encourage our suppliers to also become registered.

Company registration number: ZC1026259

Company site reference: ZS1063654

Silbury will integrate social and environmental concerns into our business operations, food safety systems and in our interaction with our stakeholders. We will use our resources in order of priority based on risk assessment and sphere of influence. Silbury has been awarded, BRC Agents and Brokers accreditation as well as RSPO and Soil Association Organic accreditations. Our customers rightly expect to receive high quality, reliable and safe food ingredients from bona-fide producers.

Silbury ensures good working relationships with all of our supply partners. We will ensure all our partners are aware of the requirements of the Modern Slavery Act 2015 within their own supply chains. We have worked with the majority (based on turnover and volume) of our UK and EU partners for more than 30 years. 24% of purchases were from UK partners, 75% from the EU and 1% from outside the EU (US and China). Silbury’s accreditations require us to undertake certain checks of their accreditations and undertake regular audits of their factories and premises. The UK and Europe are considered low under The Global Slavery Index 2016. Moreover the US, UK, Spain and Portugal Governments are cited amongst a few others as having taken the most action in this regard.

Human rights

We support and respect the protection of internationally proclaimed human rights and constantly supervise within our sphere of influence that we are not complicit in human rights abuse.

Freedom of association

We respect the freedom of association and the right to collective bargaining.

Forced labour

We do not accept any form of forced labour such as bonded labour, prison labour, slavery, human trafficking or retention of important personal documents of employees.

Child labour and young workers

We cannot accept the employment of children. The minimum age of employment shall not be less than the age of completion of compulsory schooling and in any case not less than 15 years (14 years in some developing countries). Where national law permits it, children between the





age of 12 and 15 may perform a few hours of light work per day. The work must not interfere with the children's education. For young workers below the age of 18 special precautions are taken to protect them against accidents and damage to their health.

Discrimination

We will not engage in or support any form of discrimination in hiring and employment practices. Employment related decisions shall be based on relevant and objective criteria.

Working Hours

We comply with all applicable local and national standards on working hours and overtime.

Remuneration

We comply at least with local and international legal minimum standards concerning wages and benefits including compensation for overtime. The size of wages enables workers to meet basic needs.

Notification

We give fair notice to employees of significant changes that could substantially affect them.

Working environment

We strive to offer a safe working environment for all employees. Adequate health and safety procedures are implemented. As a minimum, we comply with all local and national health and safety legislation in the countries in which we operate.

Workplace violence

We protect employees in the working place against physical, verbal, sexual or psychological harassment, abuse or threats.

Environment

We strive to minimise the environmental impact of our activities through responsible management, widespread environmental awareness and the use of technologies with low environmental impact we recognise that prevention rather than cure is a more cost-effective approach to avoid environmental damage.

Corruption

Our businesses should work against corruption in all its forms, including extortion and bribery.

Our last Financial Year year-end was 31st October 2019

Print Name: Dave Savage

Signature:
(On behalf of the Board of Directors)

Date: 25/2/20