



Modern Slavery Statement

This statement is made on behalf of Nairn's Oatcakes Limited pursuant to the section 54(1) of the Modern Slavery Action 2015 and comprises our slavery and human trafficking statement.

It sets out the steps taken by Nairn's during year ending May 2022 to prevent modern slavery and human trafficking in its business and supply chain.

Our Business

Nairn's Oatcakes was formed in June 1996 following a Management buy-out from United Biscuits (UK) Ltd.

The Company is the leading manufacturer of Oatcakes in the UK, principally under the Nairn's brand but also under retailer's own brands. It also exports to over 30 international markets. Over time, Nairn's has regularly expanded its portfolio of oat-based products - and in 2010 began manufacturing and selling a dedicated Gluten Free range – which currently comprises Oatcakes, Crackers, Biscuits, Cereals and Snacks

The Company sells to every major supermarket chain in the UK including Tesco, Sainsbury, Asda, Morrison, Waitrose and the COOP, and is well known for its high quality products.

Within the Nairn's business there are around 220 employees across two factory sites. We have also built good relationships with our suppliers who are a core part of our business success

Our Processes and Policies

Nairn's staff work in accordance with a defined set of values and behaviours which support our company vision. Our company values and behaviours were created by our staff and adherence to them creates a positive working culture which is constantly nurtured throughout the company.

It is the intention of Nairn's Oatcakes Ltd to conduct its affairs with due regard to the social and environmental consequences of its actions. The company's Ethical Trading Code outlines the code of practise employed to achieve this. Nairn's also wishes to promote this culture throughout the supply chain and to this end maintains subscription to the ethical due diligence platform SEDEX. This provides an electronic system for collecting and analysing information on ethical and responsible business practices of suppliers that focuses on 4 key areas; Labour standards; Health & Safety; Environment; Business Ethics. Nairn's regularly updates it's SEDEX self-assessment questionnaire and has also completed a Sedex Members Ethical Trade Audit (SMETA).

Nairn's encourages its suppliers to become SEDEX members, those that are not, complete Nairn's own Ethical Trading Assessment. The information gleaned from these assessments offers insight into suppliers' business practices and allows Nairn's to ensure it supports an ethical supply chain.

Nairn's has long recognized the benefits of using ethically and sustainably sourced raw materials. Wherever possible, we actively look to locally produced ingredients for our products. This not only helps the local economies which we operate, but also gives us additional reassurance over the provenance and quality of our ingredients.

We seek to operate with transparency and ethics when it comes to our use of Palm Oil. At a time when just 19% of the world's total palm oil production is classified as sustainable (Source:

RSPO), we are proud to be 100% certified by RSPO (The Roundtable on Sustainable Palm Oil) and buy only from a segregated supply chain for all Nairn's products.

Most of Nairn's employees are direct employees. We do on occasion draw on the services of a well-established recruitment agencies, who holds a gang master licences, and are audited by ourselves annually in accordance with BRC guidelines.

Nairn's whistleblowing policy encourages colleagues (including agency workers and contractors) to report any circumstances of potential unethical conduct within our organisation. In April 2019, Nairn's rolled out our ethical hotline providing staff with the facility to raise any concerns confidentially with an independent provider via telephone or website. At the time of its launch, we briefed all staff on its purpose and how to use it. The details of the ethics hotline are displayed in both English and Polish on noticeboards across both our factory sites. They are also communicated to all our new starts.

Training

Managers at Nairn's have worked with an organisation called "Stronger Together". Their sponsors include most of the UK's supermarkets and they encourage companies to work together in an effort to tackle forced labour in the supply chain. We use information and leaflets, produced by "Stronger Together", in the inductions given to all new Nairn's employees and agency staff. Information posters regarding forced labour are also displayed on all staff noticeboards.

We have also looked at how to effectively provide Equality and Diversity training as well as Modern Slavery Awareness Training to all staff and have begun to roll out this training.

Future plans

Following our initial launch and communication of our ethical hotline we will continue to ensure our employees are rebriefed regarding the process, its purpose, its confidential nature and how it should be used to raise a genuine ethical concern.

Most of our directors and managers have already completed Equality and Diversity training and we continue with the ambition of ensuring that one third of all our staff complete the training each year, on a rolling basis.

This statement is made in accordance with Section 54 of the Modern Slavery Act and constitutes Nairn's statement for the financial year commencing June 2021 and ending May 2022

The board of Nairn's Oatcakes has reviewed and approved the statement and it has been signed on their behalf.



Martyn Gray
Managing Director