

Dawn Foods, Inc.

Slavery and Human Trafficking Statement

Introduction

Dawn Foods, Inc. ("Dawn Foods") is an organisation committed to integrity and accountability in all we say and do.

That commitment applies both within the organisation and in our dealings with suppliers. We adopt a zero-tolerance approach to slavery and human trafficking. We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking is not present either in our operations or supply chains.

We are committed to working with our suppliers to ensure that slavery and human trafficking risks are identified and managed proactively.

Our business

Dawn Foods is a global business operating in fifteen (16) countries. It supplies a complete line of mixes, bases, icings, glazes, fillings, frozen dough, and fully baked products to the food industry.

We operate in the UK through our subsidiary Dawn Foods Limited which has a registered office in Worcestershire, England. Dawn Foods Limited manufactures food products and holds licences to engage in the wholesale of food.

Our global operations meet the annual turnover threshold test set down in the Modern Slavery Act 2015 ("MSA 2015").

Our supply chains

We work with trusted distribution partners to deliver our products. Details of our partners can be found here: <https://www.dawnfoods.com/uk/about-us/distribution>. We only use approved distribution partners to deliver our products. Our distributors are all BRC certified which provides a guarantee in the standardisation of quality, safety and operational criteria and ensures that manufacturers fulfil their legal obligations and provide protection for the end consumer. Our suppliers are also asked to complete a questionnaire on our Quadex system, again ensuring that they meet with our quality, safety and ethical policies.

We have taken a proportionate response to risk of slavery and human trafficking, the details of which are set out below.

Our commitment to MSA 2015

In direct response to the risk of slavery and human trafficking, we have built on our existing compliance framework by:

- Taking external legal advice on the application of MSA 2015 to our business.
- Conducting a risk assessment of our business and our supply chains.

- Communicating our senior management team's strong support for the aims of MSA 2015.
- Identifying the Cluster Director, Tim Clarkson, as the person within Dawn Foods' UK operations with day-to-day responsibility for anti-slavery and human trafficking compliance.
- Identifying Key Performance indicators against which to assess our progress in managing the risks of slavery and human trafficking.

Due diligence in our supply chains

We have conducted a risk assessment of our supply chains based on annual spend and invoice frequency.

Our distribution partners are selected by ensuring that they are BRC certified. The objective of the BRC Global Standard is to ensure that product integrity during the storage and distribution are maintained, and that customer confidence is upheld through audit and certification.

Where we identify suppliers to be "at risk" of slavery and human trafficking we will communicate to them our commitment to complying with the requirements of MSA 2015 and our responsibility to ensure, as far as possible, that slavery and human trafficking is not occurring in any part of our supply chains. We will ask such "at risk" suppliers to confirm the steps they have taken both internally and in their supply chains to ensure that slavery and human trafficking is not occurring.

Key Performance Indicators

We will use the following Key Performance Indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Any and all incidents of modern slavery and human trafficking reported to the Cluster Director are investigated within 24 hours.
- Monitoring the rate of response of "at risk" suppliers to our request that they advise us on the steps taken to ensure slavery and human trafficking is not occurring in their business or supply chains.

Future steps

We will continue to monitor the effectiveness of our compliance regime and take necessary steps to address any instances of slavery and human trafficking on an ongoing basis. We will publish an updated statement in each financial year.

This statement is made pursuant to section 54(1) of MSA 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2020.



Carrie L. Barber,
C.E.O. and Board Member of Dawn Foods, Inc.

Date: April 29 2021