

Modern Slavery and Human Trafficking Statement



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending December 2021.

Introduction

Bowman Ingredients Limited is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

Our organisational structure and operations

Bowman Ingredients Limited is a manufacturer of cereal-based food coating systems. Bowman Ingredients was acquired by Solina Group in October 2020. Solina Group is a leading European producer of savoury solutions for the food industry, with expertise in seasoning, wet sauces, plant-based applications and functional meat solutions.

Bowman Ingredients sources raw materials and packaging from many regions around the world, the majority of which come from within Europe.

We employ around 200 people in the UK across three sites in Hertfordshire and Bedfordshire. In July 2020 we completed a greenfield project to open a new production facility in Wroclaw, Poland.

We have an annual turnover of circa £60m.

Policies relating to slavery and human trafficking

Our Ethical Trading Policy and Sustainability Plan reflect our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

Through a Supplier Approval Procedure we ensure that our suppliers are aware of our policies including the Solina Supplier Code of Conduct. We continue to work towards ensuring all our raw material suppliers are members of a supply chain management platform, Sedex (Supplier Ethical Data Exchange).

Our policies have been based on the Ethical Trading Initiative base code which is founded on the conventions of the International Labour Organisation and is an internationally recognised code of labour practice.

Risk assessment

Through the Sedex platform and our own supplier audit procedure we assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking. We recognise there is a risk of modern slavery in all parts of the supply chain from where raw materials are made or grown through to the workers manufacturing our products.

To mitigate this risk we have a system of checks and controls in place to identify high-risk areas in our supply chain. Depending on the risk assessment of the manufacturer's operation we may use self-assessment questionnaires, Sedex registrations, SMETA and/or third-party audits or audits by a Bowman Ingredients team which may include visits to supplier's manufacturing sites. We will also consider suppliers use of the initiatives of Stronger Together and the standards of the British Retail Consortium.

We are committed to working with labour providers who understand that they are on the frontline of combatting modern slavery and have robust recruitment processes in place to prevent slavery and human trafficking.

Our labour providers are licensed by the Gangmasters & Labour Abuse Authority (GLAA) and licences are checked annually.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith even if they turn out to be mistaken. We are committed to ensuring no detrimental effect is suffered by anybody who reports a suspicion of modern slavery in any part of our business or our supply chain. Concerns can be raised through our Whistleblowing Policy.

Actions undertaken in 2021

Introduction of Solina Supplier Code of Conduct to ensure awareness of human rights and modern slavery throughout our supply chain.

Introduced Solina Group's Code of Ethics to Bowman Ingredients with online training.

Introduction of Solina Whistleblowing Group Policy including facility to anonymously report concerns via introduction of an anonymous online reporting portal and telephone line, Your Voice Matters, operated by an independent third-party.

The HR and Quality teams completed training to understand the requirements of social and ethical audits.

Actions for coming year

Establish regular audits of Labour Providers and third-party service providers providing cleaning and security services.

Introduce random interviews with Agency Workers to ensure they are receiving the pay rates, terms and conditions reported by Labour Providers.

Extend internal training in Code of Conduct and Stronger Together training to more colleagues.

Carry out random data checks looking for potential causes for concern such as multiple colleagues living at the same address or with the same bank account.



Alex Masih, Managing Director