

Bulldog Products Ltd.

Modern Slavery Statement 2023

This statement has been produced in accordance with the Modern Slavery Act 2015. It constitutes our Modern Slavery Statement for the financial year ending 30th June 2024.

Introduction

This statement sets out Bulldog Products Ltd.'s actions to understand all potential modern slavery risks related to the business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and our supply chains. This statement relates to actions and activities during the financial year 1st July 2023 to 30th June 2024.

As part of manufacturing of wild bird feed sector, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Company structure and supply chains

This statement covers the activities of Bulldog Products Ltd:

- Bulldog Products Ltd is a family-owned business established in Southport, Merseyside, in 1996. Since then, we have been working hard to produce quality products and feeds for wild birds as well as previously for small animals. The company source products predominantly in the UK but with extended supply chains that stretch around the world.

The company currently operates in the following locations:

- Bulldog Products Ltd operates from Southport, Merseyside, where our factory is located. From this location, the company produces high quality products ranging from fat balls to wild bird seed amongst many other products. We also have a warehouse facility in Burscough, Lancashire where all finished goods are taken to before being distributed to our customers UK wide. Smaller warehouses also store some products for us in the region. Raw products are also held at this location as a storage facility for our factory.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Our supply chain is predominantly procured from the UK however the company recognise that we source products from higher risk countries with history of slavery and/or human trafficking for example countries in Asia. The company send out an ethical trading self-assessment questionnaire in which we ask companies both UK and abroad to complete. If there is any suspicion of illegal activities following this, the company would ask for clarification. If we were still unsatisfied, the company would cease trading with the supplier and report them to the authorities.

- The company use temporary staff from recruitment agencies. To ensure our due diligence is conducted, the company ask for the issued gangmasters licence from each agency company. If the company had any concerns regarding any worker, we would inform the Police at the earliest opportunity.

High-risk activities

The company believe the main activity considered to be at high risk of slavery or human trafficking is the supply of materials which are sourced from outside of Europe, namely from Asia due to the historical issues surrounding the continent in terms of slavery/human trafficking. Working with temporary agencies also provides a higher risk than having all workers directly employed by the company.

Responsibility

Responsibility for the company's anti-slavery initiatives is as follows:

- **Policies:** Our compliance and process control departments are responsible for putting in place and reviewing policies and the process by which they were developed. Our ethical trading policy is an example of one which has been produced in line with the Modern Slavery Act 2015.
- **Risk assessments:** We acknowledge that any global operations carry with them risk of modern slavery in their supply chains. We produce modern slavery risk assessments with risk based on the level of manual labour required to manufacture products as there is greater risk of exposure on manual workforces to risks of slavery.
- **Investigations/due diligence:** Our compliance department are responsible to ensure due diligence is carried out on our supply chain and investigate any suspected instances of slavery and/or human trafficking.
- **Training:** Our compliance department are responsible for ensuring that those listed within this document complete training to better understand and respond to the identified slavery and human trafficking risks.

Relevant policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The company encourages all its workers, customers, suppliers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easier for workers to make disclosures, without fear of retaliation. Employees, our supply chain or others who have concerns can write to us using our whistleblowing email whistleblowing@bulldogproducts.co.uk.
- **Human Rights Policy** The company are committed to respect internationally recognised human rights in line with the International Bill of Human Rights. The company commit to act to mitigate human rights risks in our operations and supply chains.

- **Supplier code of conduct** The company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the company's supplier code of conduct may lead to the termination of the business relationship.
- **Temporary (agency) workers policy** The company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. The company gain the agency workers Gangmasters Licence before any work is undertaken from any agency. The company also ensures it complies with the Agency Workers Regulations (AWR) 2010.

Due diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The company's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- conducting supplier self-assessment questionnaires through the company's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing guidance to suppliers through third party auditors and requiring them to implement action plans; and
- using SEDEX, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular, although accepted not all suppliers will be on this database.

Performance indicators

The company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the company:

- has completed its target of requiring staff working in HR to have completed training on modern slavery by 2024; and
- is reviewing its existing supply chains expected to be completed by 2024, whereby the company evaluates all existing suppliers through its supplier self-assessment questionnaire.

Training

The company requires staff working in HR within the company to complete training on modern slavery. A training video via iHasco was completed on 29/06/2023 by the HR department on modern slavery.

The company's modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the different types of slavery and human trafficking;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties; and
- what external help is available, for example through the Modern Slavery Helpline, the Police, Gangmasters Licensing Authority and Protect charity.

Awareness-raising programme

As well as training staff, the company has raised awareness of modern slavery issues by putting up posters across the company's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employees can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company by communicating to their line manager and/or via our whistleblowing procedure; and
- what external help is available, for example through the Modern Slavery Helpline, 'Protect' charity and the Police.

Director approval

This statement has been approved by the company's Directors, who will review and update it annually.

Director's signature:



Director's name:

Gill Howard

Date:

01/07/2023