



**Verner Wheelock Associates Limited**  
**Modern Slavery and Human Trafficking Statement**  
**14 March 2024**

**Introduction**

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 01 January 2023 to 31 December 2023.

The statement sets down Verner Wheelock Associates’ commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

**Organisational structure and supply chains**

This statement covers the business activities of Verner Wheelock Associates which are as follows:

“The delivery of Food Industry Training Courses and Ethical Trading Audits”

The Company currently operates in the United Kingdom but can, if required, deliver training courses worldwide.

The following is the process by which the Company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking:

The management team will discuss any concerns or recommendations/ improvements to ensure all activities especially high risk activities carried out by the company are ethical and current.

Responsibility for the Company’s anti-slavery initiatives is as follows:

Policies and Procedures	Managing Director
Risk Assessments	Line Managers
Investigations and Due Diligence	Managing Director
Recruitment	Managing Director
Training	Line Managers

**Training**

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to complete an in-house training/workshop by 31 December 2024.

## Statements

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following statements set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

**2.1 Whistleblowing** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. We have a Whistleblowing line for use by all staff and associates. There is a link entitled **Whistleblowers Reporting** on our website at <https://www.vwa.co.uk/food-industry-resources.html>.

**2.2 Employee Code of Conduct** The Company's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

**2.3 Recruitment** 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. As such strict checks are in place with all agencies including vetting, reference checks and endorsements on eligibility to work in the UK documents.

## Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

## Performance indicators

The Company uses the above key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including all staff to have completed training on modern slavery by 31 December 2024.



This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Alison Wheelock

Position: Managing Director

Date: 14 March 2024

Signature:

A handwritten signature in black ink, appearing to read "ASW", with a long horizontal flourish extending to the right.