

Modern Slavery Statement 2022

John Mackle (Moy) Ltd (T/A Mackle Petfoods)

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by John Mackle (Moy) Ltd (T/A Mackle Petfoods) during the year ending 31st March 2023 to prevent modern slavery and human trafficking in its business and supply chains.

INTRODUCTION

This is the first Modern Slavery Statement for John Mackle (Moy) Ltd (T/A Mackle Petfoods).

We are dedicated to protecting people. It goes against everything we stand for to look the other way when we see human rights abuses or to knowingly contribute in some way to child labour, slavery or human trafficking.

We recognise and embrace our responsibilities relating to human rights, as an employer and purchaser of goods and services.

We recognise slavery and human trafficking is a growing global issue which no business, industry or sector, be it private or public, is considered immune from.

John Mackle (Moy) Ltd (T/A Mackle Petfoods), have a zero-tolerance approach to modern slavery and all human right abuses of any kind in our operations and our supply chains. We take our responsibilities seriously and expect our staff to report concerns using appropriate reporting channels, and our management are expected to act on them.

STRUCTURE, BUSINESS AND SUPPLY CHAINS John Mackle (Moy) Ltd (T/A Mackle Petfoods).

Mackle Petfoods, founded in 1972 and based in Co. Armagh, is one of Ireland's leading pet food manufacturers, leading the way in pet products for over 50 years. Family owned and managed Mackle Petfoods is based in Co Tyrone, N. Ireland. Exporting into 18 global markets and producing over 70 million cans and 30 million trays annually, the Mackle Petfoods brand family includes Naturo Natural Pet Food, Norsh Petfoods, Cat Club, and Brandy. The company employs over 200 staff across its Moy and Moygashel state of the art production and packaging sites.

Corporate Social Responsibility is fundamental to the culture of John Mackle (Moy) Ltd (T/A Mackle Petfoods), the company engages with the communities in which we operate to build trust and provide support.

John Mackle (Moy) Ltd (T/A Mackle Petfoods) has a global approach to supplier assurance and our preferred suppliers of key categories (ingredients, packaging, contract manufacturing, and selected services) are required to complete a detailed supplier questionnaire covering quality, food safety and human rights standards, among other areas of importance.

POLICIES AND CONTRACTUAL CONTROLS

As part of our continuing commitment to combat modern slavery we operate the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

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- **Global Code of Business Conduct:** lays out the values and principles of John Mackle (Moy) Ltd (T/A Mackle Petfoods). This code guides our shared purpose as a company and the things we do every day. It provides a roadmap for making decisions and ensuring we make the right choices, the right way, at the right time as we conduct our business.
- **Supplier Code of Ethics:** outlines the standards and behaviors expected of our suppliers wherever they are in the world where we conduct business, ensuring our value of operating with absolute integrity.
- **Anti-Bribery Compliance Policy:** This document reinforces and expands upon the guidance given in the Global Code of Business Conduct. It describes our policy prohibiting bribery and other improper payments in the conduct of business operations and explains employee responsibilities for ensuring implementation of the policy.
- **Whistleblower Policy:** We operate a **Whistleblowing Policy** principally aimed at our employees but also available to others working in our supply chain which encourages staff to report wrongdoing which extends to human right violations like modern slavery. All reports are fully investigated, and appropriate remedial actions taken.
- **Recruitment Policy:** We have a robust recruitment policy that includes conducting checks confirming eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.

DUE DILIGENCE PROCESSES

John Mackle (Moy) Ltd (T/A Mackle Petfoods) reinforces its commitment to prevent slavery or human trafficking from taking place within our business or supply chain through the following actions:

1. Incorporates affirmations against human trafficking, forced labour, and child labour, similar and consistent with this Statement, into the John Mackle (Moy) Ltd (T/A Mackle Petfoods) Code of Business Conduct, as well as the Supplier Code of Ethics and supplier contracts.
2. Complies with all local and international labour laws where we do business and operate, often going above and beyond their requirements.
3. Performs due diligence on its existing business partners, as with future potential business partners to ensure suppliers share our approach to human rights and working conditions.
4. Expects a safe and healthy work environment. We expect our suppliers to comply with all applicable safety and health laws and regulations in the countries in which they operate.
5. Provides an anonymous option, in the form of a whistleblowing system, to every employee to report any concern.

LEGISLATION

We adhere to all local and international labour laws where we do business and operate. We are committed to providing a safe and healthy work environment and we expect our suppliers to comply with applicable health and safety laws and regulations in the countries in which they operate.

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STEPS TAKEN BY JOHN MACKLE (MOY) LTD (T/A MACKLE PETFOODS) TO ASSESS AND MANAGE RISK IN SUPPLY CHAIN

We recognize that there may be a risk of slavery and/or human trafficking through organizations with whom we contract for the supply of services or goods. We aspire to be an industry leader in deterring Modern Slavery by enhancing and communicating our existing policies, our due diligence programme based on risk assessment and effective follow up, employee and supplier training, and encouraging strong partnerships, stakeholder dialogue and transparency.

All Suppliers, who are or want to be a business partner to John Mackle (Moy) Ltd (T/A Mackle Petfoods), are expected to adhere to the requirements of the Modern Slavery clause in our Professional Service Agreements and the terms of our Supplier Code of Ethics, which incorporates the philosophies of this statement. Over the next 12 months we will continue to engage with our suppliers to gain further and deeper understanding into our supply chains.

TRAINING AND COMMUNICATION

This year we will focus on contacting our key suppliers to make them aware of the Act, and the drivers and indicators of modern slavery. We circulated our modern slavery statement to all employees through our internal communication channels and will publish information on modern slavery on our website.

We are committed to refining our programme of mandatory compliance training for relevant employees and contractors on key slavery and human trafficking risk areas, including more engaging and effective training options.

ASSESSMENT OF EFFECTIVENESS IN PREVENTING MODERN SLAVERY

We understand that modern slavery risk is not static, and we will continue to develop our approach to mitigating this risk on a year on year basis. We are committed to refining the controls that we have in place to prevent modern slavery and human trafficking.

To measure the effectiveness of our approach we will report against the following identified key performance indicators in future modern slavery statements:

- Monitoring of contractual terms
- Supplier questionnaire returns
- Actions taken to strengthen supply chain
- Employee training levels

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FURTHER STEPS TO PREVENT MODERN SLAVERY IN OUR SUPPLY CHAINS

As awareness of modern slavery grows, we will formalise internal governance of modern slavery and human rights at both an operational and director level. We will monitor our suppliers' compliance with our codes of conduct and test the success of our commitments to ensure that we meet our expectations.

Looking ahead to 2023, we will monitor and review our modern slavery and human rights efforts to strengthen our commitment to ensure slavery and human trafficking do not occur in our supply chain.

We will strive to enhance our annual monitoring programme by working closely with our suppliers and business partners, to push for fairness and equality, wherever we operate, for the benefit of workers within John Mackle (Moy) Ltd (T/A Mackle Petfoods) and our supply chains. That is what our core values are about.

BOARD APPROVAL

This statement is made pursuant to section 54(1) of the Act, has been approved by the Board of Directors of John Mackle (Moy) Ltd (T/A Mackle Petfoods), and will be updated annually hereafter in line with the Modern Slavery Act 2015.

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Signed on behalf of John Mackle (Moy) Ltd (T/A Mackle Petfoods)



John Mackle
Managing Director
John Mackle (Moy) Ltd (T/A Mackle Petfoods)

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