

WARP 2021

Modern Slavery Statement

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Introduction

In February 2021, Eat Real and PROPER joined forces as WARP Snacks (legal entity – WARP Snacks Ltd) to fire up the healthy snacking revolution. We're about creating snacks with substance. We believe that you don't have to sacrifice flavour for health, or planet for profit. Which is why we use natural ingredients and follow ethical business practices, to make sure our snacks taste great and our snackers feel good.

It takes a lot of people across our business and supply chain to make our snacks. We want to do everything we can to make sure all those people are working in safe, healthy and fair environments. As a business, we recognise that the food industry is high risk for the issue of modern slavery and human trafficking, and that's why we're working to put the right structures and principles in place to protect the people who support our business.

We think that protecting people is the right way to do business. That's why it's not any one person's job to look after modern slavery. Our people team have responsibility to protect everyone who works within our business. Our supply chain and procurement teams are responsible for making sure those working within our extended supply chain are protected, by choosing suppliers who are aligned with our values and meet our due diligence requirements. Our sustainability team are responsible for setting our strategy on human rights, supporting the business to assess our suppliers against these standards and collaborating externally to ensure people are protected across our whole value chain. Ultimate accountability for protecting the people who make our snacks sits with our senior management team and our CEO, Chris – so that's why this statement is signed by him.

About us

230

Permanent employees

2

Sites

1 office in London,
1 Snacktory (snack factory)
and office in Nuneaton

22

Material suppliers

(Ingredients, packaging,
co-manufacturing)

3

Third-party manufacturers

across the UK
& Czech Republic

4

PROPER product ranges

Ready to Eat Popcorn,
Microwave Popcorn,
Lentil Chips & Popcorn Bars

4

Eat Real product ranges

Lentil, Hummus & Quinoa
Chips, Veggie Straws

4

Own-label product ranges

Policies on modern slavery

→ Our people policies:

To make sure we are protecting the people who work at any WARP site, we have an anti-harassment policy, whistleblowing and grievance procedures for all employees. These have been recently created and will very soon be accessible to all staff through our shared file system. For those working in our Snacktory, these policies will be shared on noticeboards, as is already the case for our Whistleblowing policy.

We're currently working on our 'Culture Book' which will be all about what it means to be part of the WARP business. Within this, we'll include our employee Code of Conduct, to lay out how we expect people to work with and treat each other, our suppliers, our customers and the wider community. This will be part of our induction and staff awareness programme.

→ Our supplier policies:

We have written a WARP Supplier Charter which we are in the process of rolling out to all of our material suppliers. This outlines how we want to do business, our ambition to protect people and the environment across our value chain, and within this our specific commitment to do all we can to protect people from human rights abuses and slavery. We intend to share this policy with all WARP suppliers in the next year.

Risk assessment & due diligence processes

In our first year as WARP, we've focused on some key due diligence processes within our operations and supply chain.

At our Snacktory, we work to an operational model of 70-80% permanent staff with 30-20% agency staff. We purposely engage with only one agency to provide these teams and to establish a long-term relationship of joint values. The recent selection of this agency was as a result of a comprehensive tendering process, against a standardised set of criteria which included a review of modern slavery awareness and practices.

From a supply chain perspective, we've started understanding the actual risk in our supply chain by joining the Supplier Ethical Data Exchange Platform (Sedex). This is a world-leading ethical trade membership organisation. The platform provides businesses like WARP with online tools and data to understand risks in our supply chain and to identify where we need to focus and work with suppliers to improve working conditions. We're using the tool to understand the ethical performance of facilities in our supply chain, starting with our direct material suppliers (those who we buy from directly).

In just our first 6 months of using the platform, we have:

- Connected with 82% of our direct suppliers (including ingredients, packaging, logistics partners and co-manufacturing sites).
- Used the Sedex Supplier Risk Assessment Tool (Radar) to map inherent risks within our ingredient supply chain, at both a country and sector level. We have completed this for 100% of our key ingredients (representing 81% of all our ingredient volume).
- Created (also using the Radar tool) a list of extremely high-risk sourcing locations from a human rights and environmental standards perspective.
- We have made the decision that, due to the high-risk nature of agricultural supply chains, we will no longer source ingredients from these regions, unless we take additional action. This action will be above and beyond our normal due diligence approach to make sure that people working within the WARP supply chain are protected within complex socio-economic and political situations of these countries. We do not want to take an approach to immediately stop sourcing from these countries. Instead, through offering support, training and collaboration for our suppliers in higher-risk regions, we can start to decrease the chances of human rights abuses occurring.

We're pleased about the progress we've been able to make in this space in under a year, but we know there is a lot more that we could do. Over the next year, we're working on:

- Getting connected with 100% of our direct material suppliers through the Sedex platform.
- Mapping the risks across all our ingredient sourcing locations.
- If our mapping exercise identifies extreme risks, we will be completing a deeper investigation of these and creating action plans to resolve.
- Supporting our suppliers to mitigate the identified risks within specific supply chains, to ensure that we can responsibly source 100% of our key ingredients by 2025.
- Completing our own Sedex self-assessments for WARP sites to ensure we are also meeting the requirements that we're asking of our suppliers.

Training

We want to make sure that everyone working for WARP can be on the lookout for signs of Modern Slavery and broader human rights abuses in our business and supply chains. To do that, we know that we need to start training our team.

This year, we have shared a short Modern Slavery awareness training with all our office-based staff as part of our Warp Office Weekly (WOW) meeting, attended by everyone in an office-based role at WARP. We have also incorporated Modern Slavery within our sustainability induction programme, so that all new starters joining the business are aware of our commitment to protect people and our planet.

Next, we're working on a team-specific training course, with the purpose of creating an expert team who are on the lookout for human rights risks. This will be delivered to teams who are most needed to identify issues within our business and supply chains; our supply chain, technical, procurement, people and sustainability teams. We will be rolling out this additional training during 2022 and 2023.

Next steps

We know we have a long way to go to combat the issues surrounding modern slavery in our supply chains.

This list summarises from this statement the actions that we've committed to complete during 2022 and into 2023.

In the next year, we will also work towards measuring KPIs that we can share within our future modern slavery statement. By doing so, we hope to show our progress and share what we've learnt about all of the people who are involved in making our snacks.

Creating an employee Culture Book, which will include our expectations on conduct of all WARP people.

Rolling out and signing our Supplier Charter with all WARP suppliers in the next year.

Connecting to 100% of our direct material suppliers on Sedex and ensuring they have completed self-assessments as a minimum.

Mapping our key ingredients to farm-level, to start to build better transparency of both environmental and ethical standards within our supply chain. Where necessary, creating action plans to make sure people are being respected within our supply chain.

Completing a human rights and environmental risk map for the country of origin of all WARP ingredients.

Where extreme-risk countries of origin are identified, we will be completing a deeper investigation of these and creating action plans to further understand and mitigate the risks associated with sourcing from these locations.

Completing Sedex self-assessments at our London and Nuneaton sites.

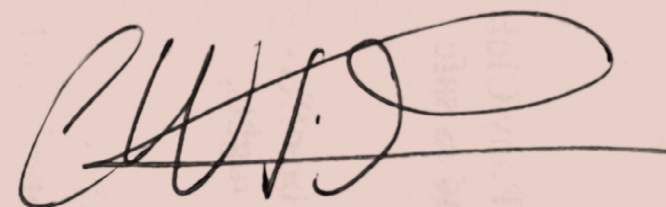
Training all new WARP people on human rights as part of our overall sustainability induction programme.

Creating a more detailed training programme on human rights for key teams within the business.

Thanks for reading

The progress and next steps we have shared in this statement are the start of a long-term commitment to identify and mitigate the risks to people working across WARP's operations and supply chains. WARP's work to protect and respect the people connected to our business is ongoing and we will continue to learn, develop our approach and report on our work to combat modern slavery.

This statement has been published in accordance with the Modern Slavery Act 2015 and constitutes WARP Snacks statement for the financial year ending December 31st 2021. It has been approved by the Board of Directors of WARP.



Chris Schulze-Melander
CEO WARP Snacks

