

Modern Slavery and Human Trafficking Statement 2018

Overview and Structure

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes the slavery and human trafficking statement for Wittington Investments Limited (the 'Company') for the financial year ended 15th September 2018.

The business of the Company is the management of investments in a wide range of assets which fall into six business segments. The most significant segment is the Company's holding in Associated British Foods plc ('ABF'), a diversified international food, ingredients and retail group with sales of £15.4bn, 133,000 employees and operations in 50 countries. ABF publishes its own Modern Slavery and Human Trafficking Statement which can be found on its website at www.abf.co.uk/responsibility/cr_downloads. The remaining business segments are Other Retail, Real Estate, Hotels, Private Markets and Other Investments.

The steps we take to try and ensure that modern slavery, in any of its forms, is not present within our operations are set out below.

Supply Chain

We consider the risk of slavery or human trafficking within our supply chain to be low. The supply chain involves very few direct suppliers and employees, with the majority being based in the UK. The Company is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to act ethically and with integrity in all its business relationships.

Policy

Notwithstanding the relatively low risk, we understand the importance of combatting slavery and human trafficking. We are committed to ensuring that modern slavery is not taking place in our business or our supply chains and that our approach to monitoring our business and suppliers is proportionate and risk-based.

We work to the highest ethical standards, maintaining and improving our policies and processes to avoid any potential complicity in human rights violations related to our operations. We encourage an open, transparent and collaborative culture in all our dealings with suppliers, employees and other people with whom we come into contact. We believe that all employment should be freely chosen and are opposed to any form of child labour or practices that inhibit the development of children. We have a firm-wide whistleblowing policy for any employee who wishes to raise concerns and we make every effort to protect their confidentiality. The Company checks that all employees can demonstrate their eligibility to work in the UK.

Training

It is essential that all our staff have an awareness of modern slavery issues and we provide, on an ongoing basis, information and training to staff.

Approval

This statement has been approved by the Board of Directors of the Company and has been signed by the Chairman.

A handwritten signature in blue ink, appearing to be 'Guy Weston', written in a cursive style.

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Guy Weston