

Modern Day Slavery Act 2015 Statement

Policy Avondale Foods (Craigavon) Ltd., commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management.

It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

Our Responsibility:

We acknowledge our responsibility in complying with the Modern Day Slavery Act 2015 and respect international standards and practices including Human Rights. Human Rights is fundamental to the sustainability of our business and we are committed to ensuring that all people are treated with DIGNITY and RESPECT. This applies to all employees, shareholders, visitors, suppliers, contractors and anyone with interaction with the company.

Our Commitment:

We Prohibit Forced Labour and Human Trafficking

The Company prohibits the use of all forms of forced labour and any form of *human trafficking*. This is expanded on through the Company's collaboration with "Stronger Together" and the Gangmasters and Labour Abuse Authority (GLAA).

Preventing Hidden Labour Exploitation – "Stronger Together" is an organisation that Avondale Foods is a member of. The aim of the organisation is to develop and adopt a proactive approach to tackling hidden labour exploitation.

We provide information on Stronger Together and Human Rights at Induction and periodic training. Posters are also displayed.

We do not charge job finding and we will not use any individual or organisation who are charging work finding fees.

What is Hidden Labour Exploitation?

Workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management.

1. Ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and signs to look for, have signed appropriate Compliance Principles and possess a valid Gangmasters and Labour Abuse Authority (GLAA) certificate.
2. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members. We work closely with the GLAA in tackling hidden labour exploitation.

We audit all our third party labour providers and take significant steps during recruitment and induction to identify any alert flags that may indicate potential worker exploitation.

We Prohibit the Employment of Child Labour

The Company prohibits the hiring of individuals less than 16 years of age.

We Comply with Work Hours, Wages and Benefits Legislations

The Company operates in full compliance with applicable wage, work hours, overtime and benefits laws.

We Uphold the Ethical Trading Initiative (ETI) Base Code

This is a code that aims to promote respect for workers' rights around the globe. The Base Code:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

Few workers have protection against physical, verbal or sexual abuse in the workplace.

We Value Diversity

Avondale Foods values the diversity of the people we work with.

Avondale Foods has a long standing commitment to equal opportunity and intolerance of discrimination and harassment.

Avondale Foods is dedicated to maintaining workplaces free from discrimination on the basis of those protected characteristics.

The basis for recruitment, hiring, placement, training, compensation or advancement at the Company does not conflict with any of these principles. Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. We will not tolerate any direct or indirect discrimination on grounds of **Protected Characteristics**: race, gender, gender reassignment, colour, national or social origin, religion, age, disability, sexual orientation, political opinion

We Acknowledge Freedom of Association and Collective Bargaining

The Company respects our employees' right to join or not to join a labour union without fear of reprisal, intimidation or harassment. There is a recognised works committee onsite.

WE Provide a Safe and Healthy Workplace

The Company provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements.

We Provide Workplace Security

The Company is committed to maintaining a workplace that is free from violence, harassment and intimidation from internal and external threats.

Our Reporting Procedure:

We encourage all workers to report any suspected signs or violations of our Modern Day Slavery Policy and related policies to their supervisor, department manager, Union Representative, or through the company's anonymous whistleblowing hotline.

No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company is committed to investigating, addressing and responding to the concerns of employees and taking corrective action in response to any violation.