

Modern Day Slavery and Human Rights Statement

This statement sets out the company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement applies to all employees, shareholders, visitors, suppliers, contractors and anyone with interaction with the company. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

Company structure and supply chains

- The company has established an excellent reputation for the high quality of its range of fresh food products and its consistent level of customer service. As a result, it has attracted an enviable customer base and has enjoyed considerable year-on-year growth.
- The company has a workforce of 530 employees, 67% of which are non-UK and Irish nationals.
- The company source responsibly from various suppliers to include raw materials, fresh produce, packaging, labels and films, and services.

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 are 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.

Due Diligence:

Including:

- conducting labour supplier audits focused on slavery and human trafficking where general risks are identified; either advising or requiring them to implement action plans if necessary
- carrying out a monthly "Active Check" through the GLAA website
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular; attending "Stronger Together"
- working with suppliers by holding a supplier conference to ensure that they adhere to the general standards of Avondale Foods including ethical standards
- conducting site visits with key strategic suppliers
- carrying out a regular survey with agency workers

Relevant Policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy** – 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 company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline: Expolink 0800 374199.
- **Dignity at Work** - the company's code makes clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating both on-site and off-site and while managing its supply chain.
- **Recruitment and Selection Policy** - the company is committed to providing equality of opportunity in employment to all persons.

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**
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).
- 2. Freedom of association and the right to collective bargaining are respected**
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.
- 3. Working conditions are safe and hygienic**
The company provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements.
- 4. Child labour shall not be used**
The company prohibits the hiring of individuals less than 16 years of age.
- 5. Living wages are paid**
The company operates in full compliance with applicable wage, work hours, overtime and benefits laws.
- 6. Working hours are not excessive**
The company pays according to the hours that have completed on a weekly basis. The company offers voluntary overtime as per business needs.
- 7. No discrimination is practised**
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.

8. Regular employment is provided

The company issues an employment contract to establish an employment relationship

9. No harsh or inhumane treatment is allowed

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

Training

The company requires all employees, factory manager, supply chain manager and HR professionals within the company to complete training on modern slavery.

Human Rights, Modern Day Slavery and Equal Opportunity training is given at induction and refresher training is given to all employees in the course of their employment.

Awareness

As well as training staff, the company has raised awareness of modern slavery issues by displaying posters on the company's notice boards, circulated by company email, and features in the company's quarterly newsletter. These include the following:

- Ethical Base Code
- Modern Day and Human Rights Policy
- Third Party Helpline
- Stronger Together Multi Language Poster
- Union Information
- Expolink

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.

This statement was approved on 9th April 2019 by the company's board of directors, who review and update it annually.

Signed:

Derek Geddis
Company Chairman