

Policy - anti-slavery

Aims of this policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, volunteers, interns and any other third party representative.

We expect all who have, or seek to have a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy (or those who are taking verifiable steps towards compliance).

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

What do we mean by modern slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

Slavery: where ownership is exercised over an individual

Servitude: involves the obligation to provide service imposed by coercion

Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.

Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

How we seek to embed our anti-slavery policy in practice

To underpin our policy commitments, the Company:

- operates in compliance with the Ethical Training Initiative (ETI) which derives from the core conventions of the International Labour Organisation, and from the United Nations Universal Declaration of Human Rights.
- subjects itself to audits by third parties who publish our audit results on the Supplier Ethical Data Exchange (Sedex). This is a web-based database where suppliers post labour standards information and self-assessments in addition to all site audit reports. Avondale Foods Ltd is a registered member of SEDEX and uses this platform to manage its supply chain relations with customers and suppliers.
- keeps fully abreast with the work of the GLAA (Gangmaster's and Labour Abuse Authority) who are responsible for the licensing of labour providers within the food and agricultural sectors in the UK.
- is part of the Stronger Together initiative which is a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking and other hidden third-party exploitation of workers. They provide guidance, training, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.
- has a whistle blowing hotline "SeeHearSpeakUp". This confidential hotline provides employees and stakeholders with an opportunity to report unethical practices, human rights issues or food safety standards. This hotline is operated by a third-party company. For further details please view our Whistleblowing Policy.
- Has a 'Discovering Worker Exploitation Procedure' and communicate to all employees the importance of and process for reporting and investigating suspected worker exploit

Supply Chain and Due Diligence

Our products are composite products with ingredients purchased from manufacturers and through agents. Ingredients are sourced from all over the world but primarily UK and Europe. This can, at times, lead to complex supply chains, to help mitigate any human rights risks we have procedures in place to prevent these.

We have in place for all ingredients a human rights risk assessment which includes modern slavery, this risk assessment includes the country where the ingredient is manufactured and other countries where it may be sourced, what the supplier's current controls for human rights are and available audit history from SEDEX.

Questionnaires are completed by our suppliers to disclose their human rights controls. Any indicators of risk are appropriately followed up.

We require that all our suppliers are registered to SEDEX and in some cases that a site ethical audit is carried out.

We communicate our human rights expectations and our objectives to our suppliers have sent a copy of our Human Rights Policy & Supplier Code of Conduct to all.

We monitor the performance of our suppliers in relation to human rights and keep our risk assessment updated regularly with developments.

Responsibility for this policy

The board of directors has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The Human Resources department will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

Communication and employee awareness training

The Human Resources department will ensure that all staff receive training on this policy and any supporting processes applicable to their role. Such training forms part of the Company's induction processes.

In addition staff will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and the identify individuals/areas of the business that may be at risk from practices of modern slavery.

Breaches of this policy

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure and could result in summary dismissal for gross misconduct.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

A process of remediation will be worked through with those affected by slavery and the steps taken will be judged on a case by case basis.

If any part of this policy is unclear, clarification should be sought from the Human Resources department.

Status of this policy

This Anti-slavery policy will be reviewed by the Company's board of directors on a regular basis.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.