

## Chaucer Foods Group - Modern Slavery and Human Trafficking Statement

### Introduction

The Board of Directors and SMT at Chaucer Foods are fully committed to the implementation and the requirements of the Modern Slavery Act 2015. This includes the provision of adequate resources, effective communication and review systems, alongside actions taken to enable continuous improvements.

Our employees will be made aware of the risks of slavery and human trafficking and are expected to report any concerns. Management will be expected to act upon them.

### Our Business and its Structure

Chaucer Foods is a global business manufacturing freeze dried fruits, vegetables, dairy, dried bread-based foods, and other related items.

### Our Supply Chain

As we seek to provide our customers with a consistent supply of quality products each day, our supply chain is complex and includes the sourcing of products worldwide from more than 15 different countries in Europe, North Africa, North and South America and Asia.

Our supply chain consisting of 150+ suppliers are a broad mix of sizes and structures and varies from one tier to complex multi-tiered suppliers. We deal direct with growers, larger co-operatives, as well as international importers and wholesalers. Wherever a product originates, Chaucer Foods is fully committed to a policy of only dealing with goods which have been sourced in an ethically responsible and legal manner, helping to support a sustainable and transparent supply chain.

### Our Policy on Modern Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking does not take place anywhere in our supply chain.

## Due Diligence

As part of our company's due diligence process we audit our suppliers on a regular basis and will only work with companies who also commit to the eradication of slavery and human trafficking. The auditing process is either through physical audits or assessment of questionnaires that include a range of questions on human rights.

Our procedures are designed to:

- Establish and assess areas of potential risk in our business and supply chains;
- Monitor potential risk areas in our business and supply chains;
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains;
- Provide adequate protection for whistle blowers.

Chaucer Foods regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain.

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Chaucer Foods slavery and human trafficking statement for the calendar year commencing 1<sup>st</sup> January 2018.

Tom Malkoski

Chief Executive Officer

Full name: Anti-slavery and human trafficking policy.

## **1. Policy Statement**

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4. This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **2. Responsibility for the policy**

- 2.1. The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2. The Chief Operating Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

- 2.4. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to [the compliance manager].

### **3. Compliance with the policy**

- 3.1. You must ensure that you read, understand and comply with this policy.
- 3.2. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3. You must notify your manager or the Chief Operating Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Chief Operating Officer as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 3.6. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Chief Operating Officer.
- 3.7. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager or the Chief Operating Officer immediately. If the matter is not remedied, and you are an

employee, you should raise it formally using our Grievance Procedure, which can be found in The Company Handbook.

#### **4. Communication and awareness of this policy**

- 4.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **5. Breaches of this policy**

- 5.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.