

Tackling Hidden Labour Exploitation

Statement of Intent

Adelie Foods Ltd' vision is to be the preferred choice in food to go; delighting our customers and consumers with the perfect mix of quality, innovation, value and service. We supply the UK retail and foodservice sectors with a portfolio of consumer led chilled food products.

As part of the food service industry, the organisation recognises that it has a responsibility to take a robust approach to anti-slavery and human trafficking. This is represented in one of our core Values, '*Let's be responsible*' which is at the forefront of the organisations commitment to '*act ethically in all we do, provide a safe place to work and to believe in the value of community*'.

The organisation is committed to the highest level of ethical standards and sound governance arrangements and adopts zero tolerance to labour exploitation or knowledge of the existence of labour exploitation.

It is fully committed to developing and adopting a proactive approach to tackling hidden labour exploitation in its corporate activities, for example within its recruitment processes, and to ensuring that its supply chains are free from slavery and human trafficking.

To this end we fully support the government's objectives to eradicate modern slavery and human trafficking and this policy is endorsed by our Board

We will annually publish statements to supplement this policy, including details of our activities, supply chains and actions we will put in place to ensure our corporate activities are free from slavery and human trafficking.



Martin Baker
Group Technical, Risk & Compliance Director
August 2016



Meirion Gravell
Group Human Resources Director
August 2016

Adelie Foods Ltd

Slavery and human trafficking statement 2015/2016

Introduction

This statement sets out Adelie Foods Ltd.'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 relates to actions and activities during the financial year 1 April 2015 to 31 March 2016.

1. Adelie Foods Ltd engages with a large number of private and public sector organisations on a customer and supplier basis.
2. Our activities take place solely in the United Kingdom of Great Britain and Northern Ireland

Recruitment

3. Our recruitment activities take place in England; and the recruitment agencies that we use are UK based.
4. All appointed recruitment agencies, labour providers and other organisations in the labour supply are required, under Adelie Foods Ltd terms of the Supply Agreement for Temporary Staff, to ensure that they comply with all applicable laws, regulations and sanctions relating to modern slavery and human trafficking including but not limited to the Modern Slavery Act 2015; and any anti-slavery policy adopted by Adelie Foods Ltd
5. The organisation:
 - Accepts that job finding fees are a business cost, and will not allow these to be paid by job applicants.
 - Ensures that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
 - Will ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and signs to look for and that they will sign the appropriate Compliance Principles declaration (Appendix 1).
 - Signed up as a partner of 'Stronger Together' to access multilingual posters, flyers, guides and best practice advice
 - Will provide information on tackling "Hidden Labour Exploitation" to the workforce through a variety of formats including workplace posters, worker leaflets, induction, other training.
 - Intends that all staff working in Supply Chain and Human Resources in particular will receive "Tackling Hidden Labour Exploitation" training
 - Will adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.

- Will positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities through the National Reporting Service.

Supply Chain Policy

6. Our procurement activities take place in England; and our contractors and suppliers are predominately UK based.
7. Our total procurement spend is in the region of £160m through a variety of approved suppliers
8. We expect our supply chain partners and other companies we engage with to ensure their goods, materials and labour-related supply chains:
 - Fully comply with the Modern Slavery Act 2015; and are
 - Transparent, accountable and auditable; and are
 - Free from ethical ambiguities
9. Individuals with evidence of non-compliance with the Modern Slavery Act in connection with Adelie Foods Ltd supply chains are encouraged to use the National Reporting Service.

Steps taken by Adelle Foods Ltd since July 2015 – Year 1

A. Management responsibility and general awareness

- We have agreed management responsibility for this policy and statement and received endorsement from our Executive Leadership Team and Board

B. Risk Assessment

- We identified and issued to supply chain providers our policy on tackling hidden labour exploitation accompanied by a Compliance Principles declaration (Appendix 2) for signature and return

C. Risk Mitigation

- We have added a provision to our Supply Agreement for Temporary Staff documentation requiring all appointed recruitment agencies to confirm compliance with our policy and procedure
- With immediate effect we require all new supply chain suppliers to confirm compliance with all applicable laws, regulations and sanctions relating to modern slavery and human trafficking including but not limited to the Modern Slavery Act 2015
- Use of Stronger Together video/literature from the board to factory in order to raise awareness and offer a safe environment for staff to step forward

Steps to take – Year 2

A. Management responsibility and general awareness

We will:

- Report progress to our Executive Leadership Team and our Board
- Need to raise general organisational awareness through circulating the policy document and re-issuing the associated company policies covering recruitment, anti-bribery and corruption as well as displaying posters and providing training for employees, this includes for new employees as part of our on boarding process
- Raise awareness of this published statement by notifying organisations with which we regularly engage
- Prepare the second annual statement
- With immediate effect we require all new supply chain suppliers to confirm compliance with our policy and procedure through signing a Compliance Principles declaration Appendix 1

B. Risk Assessment

- We undertake to carry out a review exercise of this policy against our activities to establish whether the approach we are adopting is in line with emerging best practice

C. Risk Mitigation

We will:

- Act promptly if a compliance breach is identified or flagged
- Use feedback obtained to review and amend our risk management process

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Adelie Foods Ltd slavery and human trafficking statement for the financial year ending 31 March 2016.

Appendix 1 - Recruiter Compliance Principles

Recruiter Name Business

All Recruiters must:

- 1 Sign this document before interviewing any applicants.
- 2 Only interview applicants in an approved location.
- 3 Not allow applicants to complete registration documents on behalf of others.
- 4 Not accept money, favours or any gifts at all from applicants or workers.
- 5 Not loan any personal money to temporary workers.
- 6 Notify a manager when informed by an applicant or worker that they have paid money to be introduced to the Company.
- 7 Not allow an unauthorised agent or individual to introduce job applicants to the Company.
- 8 Notify a manager when suspecting an individual of introducing job applicants to the Company for personal gain.
- 9 Not act as landlords or be involved in the provision of accommodation, transport or other paid for services to workers.
- 10 Not allow anyone other than an authorised person to choose which workers are selected for work shifts.
- 11 Not force or coerce temporary workers to work against their will.
- 12 Not threaten or subject workers to physical or mental mistreatment.
- 13 Treat applicants and workers with dignity and respect.
- 14 Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a manager immediately.

I confirm that I understand and will comply with the above principles.

Recruiter's Signature: Date:

I have checked and confirm that the Recruiter understands the above principles.

Manager's Signature:Date:

Appendix 2 - Supplier Compliance Principles

Supplier Name Business

All Suppliers must:

- 1 Sign this document before supplying any goods.
- 2 Not allow applicants to complete registration documents on behalf of others.
- 3 Not accept money, favours or any gifts at all from applicants or workers.
- 4 Not loan any personal money to temporary workers.
- 5 Notify a manager when informed by an applicant or worker that they have paid money to be introduced to the Supplier.
- 6 Not allow an unauthorised agent or individual to introduce job applicants to the Supplier.
- 7 Notify a manager when suspecting an individual of introducing job applicants to the Supplier for personal gain.
- 8 Not act as landlords or be involved in the provision of accommodation, transport or other paid for services to workers. It is noted that it is common practice in some countries to provide worker accommodation on site. However this is non-binding, workers are not forced to live in these hostels, although many choose to do so.
- 9 Not allow anyone other than an authorised person to choose which workers are selected for work shifts.
- 10 Not force or coerce temporary workers to work against their will.
- 11 Not threaten or subject workers to physical or mental mistreatment.
- 12 Treat applicants and workers with dignity and respect.
- 13 Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a manager immediately.

I confirm that I understand and will comply with the above principles.

Supplier's Signature: Date:

I have checked and confirm that the Supplier understands the above principles.

Manager's Signature:Date: