

Tackling Hidden Labour Exploitation

Our Statement of Intent

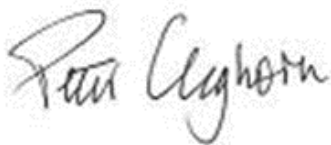
Every person at Adelie Foods Ltd is proud to fully support the government's objectives to eradicate modern slavery and human trafficking. The Board are proactively involved in driving a culture that seeks to identify and remove any risks to our high ethical standards. We encourage every colleague, at every level of the business to take action to bring these abhorrent practices to an end.

Our 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 and therefore we are a proud part of the supply chain that moves food from farm to fork in the UK and beyond. As such, we are dedicated to a rigorous approach to anti-slavery and human trafficking in every aspect of our business.

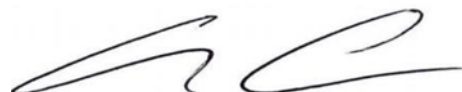
Working in partnership with our customers and suppliers, we are committed to sound governance arrangements and a zero tolerance to labour exploitation or knowledge of the existence of labour exploitation. We also take every opportunity to identify and tackle hidden labour exploitation within our employment practices and agency relationships to ensure that our supply chains are free from slavery and human trafficking.

Our annual statement provides information 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.

This policy is fully endorsed by every member our Board.



Peter Cleghorn
Technical, Risk and Compliance Director
April 2019



Meirion Gravell
Group Human Resources Director
April 2019

Adelie Foods Ltd
Slavery and Human Trafficking Statement
2019/20

Introduction

This statement sets out Adelie Foods Ltd.'s actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

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

Commitment

Adelie Foods Ltd are committed to ensuring all sites are free from;

3. Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
4. Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
5. Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous.

Recruitment

6. Our recruitment activities take place in the UK; and the recruitment agencies that we use are UK based.
7. 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

8. The organisation:

- Agrees 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 colleagues.
- Will ensure that all colleagues 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).
- Will provide information on tackling “Hidden Labour Exploitation” to the workforce through a variety of formats including workplace posters, worker leaflets, induction, other training. Our confidential Whistleblowing Hotline is accessible to all, and rapidly addresses any concerns raised.
- Intends that all colleagues 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

9. Our procurement activities take place in the UK; and our contractors and suppliers are predominately UK based.
10. Our total procurement spend is in the region of £90 million through a variety of approved suppliers
11. 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
 - Individuals with evidence of non-compliance with the Modern Slavery Act in connection with Adelle Foods Ltd supply chains are encouraged to report use the National Reporting Service

Steps to be taken by Adelle Foods Ltd 2019 – 2020

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. Additionally we will display information posters and providing training for employees, including new employees as part of our on-boarding process
- Provide leadership training and information to managers to clarify their responsibilities and confirm what action should be taken to support all our extended workforce.
- Raise awareness of this published statement by notifying organisations with which we regularly engage
- Prepare the next annual statement

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 Adelle Foods Ltd slavery and human trafficking statement for the financial year ending 31 March 2020.

Appendix 1

Responsible Recruitment and Sensitive Selection: **Compliant Recruitment Principles**

All hiring managers must be aware of risks of hidden labour exploitation and modern slavery for both directly employed individuals and agency workers. These abhorrent practices can be well masked so we provide guidance and training to all hiring managers to spot the signs. Please sign the document below before commencing any selection or recruitment activity to ensure that you have all the information you need to help you identify any signs or risks, know how to best support any impacted individuals and formally report concerns. If you require any additional guidance or training beforehand, please speak to your Line Manager and HR

Recruiter Name**Department & Site.....**

Before signing below please read and confirm the below;

- 1 I have reviewed the annually updated 'Responsible Recruitment and Selection Policy' plus 'Modern Slavery Policy' before commencing any recruitment activity.
- 2 I undertake to recruit and select each applicant solely on the basis of their competency for the role, and will promote the principles of equality, diversity and inclusion at every stage of the process
- 3 I have received the training I need to competently select and recruit on behalf of the Company.
- 4 I will only interview applicants in an approved location.
- 5 I will not allow applicants to complete registration documents on behalf of others.
- 6 I will not accept money, favours or any gifts at all from applicants or workers.
- 7 I will not loan any personal money to temporary workers.
- 8 If informed by an applicant or worker that they have paid money to be introduced to the Company I will immediately report this to Resourcing and my Line Manager
- 9 I will not allow an unauthorised agent or individual to introduce job applicants to the Company.
- 10 I will notify my Manager and HR if I suspect an individual of introducing job applicants to the Company for personal gain (outside of the Referral Programme).
- 11 I will not act as a landlord or be involved in the provision of accommodation, transport or other paid for services to workers.

- 12 I will not allow anyone other than an authorised person to choose which workers are selected for work shifts.
- 13 I will not coerce or allow others to coerce or force temporary workers to work against their will.
- 14 I will always treat applicants and workers with dignity and respect. I will not subject, or allow others to subject workers to mental or physical mistreatment.
- 15 I will proactively raise any knowledge or suspicions of illegal or dubious activities or poor conduct the management of agents, temporary workers or colleagues to my Line Manager or HR 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.

Line Manager’s Signature:Date:

Appendix 2

Supplier Compliance Principles

Supplier Business Name

Individual representative and Role

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.
- 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.

Adelie Manager's Name & Signature:Date: