

THE

COMPLEATFOOD

GROUP

Modern Slavery and Human Trafficking Statement

Financial Year April 2022 to April 2023

This statement is in response to the Modern Slavery Act 2015, and sets out the Company commitment to identifying and preventing modern slavery and human trafficking in any part of its business and supply chain.

The Company commits to developing and adopting a proactive approach to tackling modern slavery and labour exploitation within its business practices, as well as through risk assessment and due diligence of its supply base.

The company follows the requirements of the Ethical Trade Initiative (ETI), requiring all suppliers to comply with this.

This is our first statement as the Compleat Food Group, we have previously completed 6 statements.

Our Business & Supply Chain

The Compleat Food Group is a food business that supplies both own-label and branded chilled, frozen and ambient products to Retail and Food Service. The company has manufacturing site in the UK and has partnerships with manufacturers across Europe.

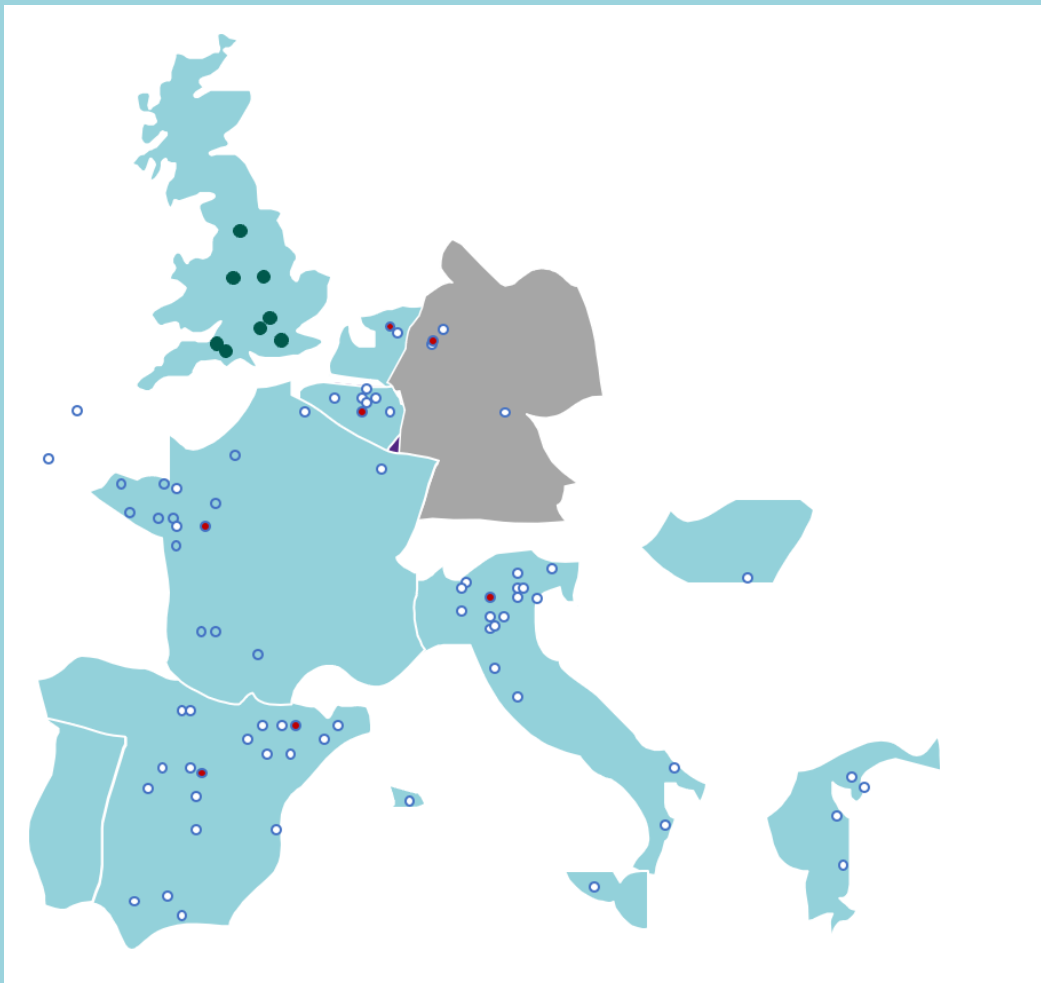
The group consists of 10 manufacturing sites across England with 3,740 Colleagues and there are partnerships with 85 manufacturing sites in Europe. Each site has its own area of specialism with expert teams focused on category leading innovation continually delivering premium quality products and service to new and long standing customers.

Our brands include the following.



Our Supply Chain

The supply base is complex with manufacturing sites being based throughout Europe procuring raw materials from a worldwide supply base. The company uses mapping to give transparency of its supply chains and to understand the human rights risks.



Key

- The Compleat Food Group UK sites
- Production partners
- Transport hubs

Implementation within the UK

While our Human Resources and Ethical teams take a lead role on upholding human rights all our departments are accountable and work together to achieve our goals. Monthly Group ethical meetings are held to focus on key human rights issues within supply chains which includes emerging risks and driving longer term objectives.

As part of our terms and conditions with recruitment agencies, key requirements to mitigate slavery are incorporated.

A robust recruitment policy and set of practices exist, in line with UK legislation, including right to work document check, contracts of employment and ensuring that personal information provided is genuine.

The company are also members of the Association of Labour Providers (ALP), which provides information and support to all the UK sites. Our Recruitment and HR functions have access to their specialised training events.

All labour providers are audited before commencing supply and then at least annually using Complyer. Annual due diligence audits are also carried out internally to focus on specific risk areas. All labour providers are members of GLAA where required and Stronger Together. Labour providers are required to be members of Sedex or to complete the company's Ethical SAQ.

The company has a list of approved labour providers covering all UK sites.

Periodically randomly selected workers are required to complete questionnaire on their employment, confidentially, offering them the means to alert the business to any concerns they may have.

Human Rights Champions have been appointed at each UK site.

Ethicspoint (NAVEX) is the third party independent whistleblowing hotline provider for the company. This is communicated during the induction for all workers.

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Liaising closely with labour providers, to encourage their engagement also in such workshops and training events to build on their knowledge and understanding of modern-day slavery.



In July 2022 our Ethical Committee representatives presented to the Board on Human Rights. Our objective was to raise awareness of human rights across the Compleat Food Group, gain the Boards commitment and training was a key action to achieve this.

We selected Tyler Bladon as our provider for the training as they have a wealth of knowledge with personal experiences. Their aims is to not just show what to do but how to do it. The key focus was raising awareness of the types of exploitation which could be in our sites and our supply chains and how to spot the signs. In October we carried out the first sessions with members of the Procurement and Technical teams who work directly with suppliers into Compleat Food Group. The training included our new Human Rights Risks checklist which is to be used for all visits to sites. The training also covered our new Response plan to be used where worker welfare, worker exploitation or Modern slavery may be suspected or confirmed. The training gave practical examples within a UK manufacturing site or out at supplier site to give delegates an understanding

96% agreed that the training met their expectations.
93% agreed they had learnt a lot and felt confident to use newly acquired skills.

The next courses will be to the NPD team , followed by HR and Operational roles across the UK sites. A combination of face to face and video training will be used. The training will include those in Worker Rep, Human Rights Champions and Mental Health First Aiders roles. Also we will invite Labour Providers take part in the training.

All new employees in key roles will receive training on Modern Slavery as part of their induction and the new video by Tyler Bladon will be included in this. We will continually review the training plan to identify further training needs.

The new Response Plan and Remediation record were used in a potential issue at a site. We provided assistance to the GLAA to gather evidence on this suspected case. Overall, the action from our business was commended as was our cooperation in the investigation.

During 2022 we have reviewed our suite of training with Stronger Together, ALP, Tyler Bladon and in 2023 we will continue to use the Stronger Together Business Partner Assessment Tool to highlight any gaps in training.

To mark Anti-Slavery Day 2022 on 18th October the company had we raised awareness across the group with communications at each site such as posters and social media.

We will further develop the resources for next year taking into account the profile of workers at each site

Implementation within Outsourced Manufacturing

We are focused on the engagement of the manufacturing base in the issues surrounding modern day slavery and human trafficking.

- All suppliers are required to comply with the company's Responsible Sourcing Policy
- To obtain an understanding of the ethical status of new sites before supply commences there is an Ethical section within the New Supplier Questionnaire. This gives initial information which will then be followed by membership of Sedex or Completion of a SAQ depending on the supplier/customer.
- Sedex (Supplier ethical data exchange) is a useful tool to the business helping to identify and mitigate risk within supply chains. Sedex provides an initial risk assessment for a supplier taking into consideration known inherent country and industry risks. This allows identification and monitoring of specific high risk products or areas.
- The Company requires all sites that supply UK retailer own brand products to be members of Sedex. Sites must be fully linked to Compleat Food with fully visibility rights of their SAQ and audit information. Sites must have a fully completed SAQ to be reviewed every 6 months.
- Production partners that supply branded lines are required to join the Sedex network, or they complete the Compleat Food Ethical SAQ.

Further down our supply base, we recognise the need for further education on the fundamentals of modern day slavery and human trafficking. Our supply base consists of hundreds of small growers and farmers and reaching out to these producers using appropriate communication methods and materials remains a constant challenge.



Risk Assessment

We have a risk assessment through which using the data provided from our supplier SAQ's and Sedex can identify areas of our producer network that need additional focus and support, and we continue to build on this. We will be developing risk assessments that combine multiple sources of data to give a more focused approach to identify specific risks at our sites and within our supply chains.

Audits

The company work with a team of global independent auditors to conduct ethical audits. Local auditors who are familiar to the laws, working practices and language of the country where the audit is taking place are used. Audits consist of observations from a site tour, paperwork reviews, confidential employee interviews and management interviews.

In the financial year 2022/2023 ethical audits have been carried out/ are scheduled at 5 of our UK manufacturing sites and 11 outsourced manufacturing sites. If a non-conformance is identified, the company aim to work together with sites and certification bodies to implement sustainable solutions to resolve these issues. The company are part of the Sedex SMETA X working group developing the new audit standard which are sites will be assessed against.

Audit non-conformances are trended to highlight common areas, which require focus. Best practice guides have been written on key areas for example for Outsourced sites in Europe Fire Safety best practice to encourage businesses to internally review their procedures against these suggestions, with the aim of driving sustainable change.

The scale, complexity and seasonality of our supply base of primary growers and farmers, means that specific independent audits are not always possible. The new Human Rights Checklist will be completed during site visits by trained staff and this information will be reviewed by the ethical team.

Collaboration

We're committed to working collaboratively to help increase our effectiveness in tackling modern slavery. We're active members of the Sedex and FNET (Food Network on Ethical Trade) and play an active part in other collaborative working groups across the industry and more widely. The Company acknowledges that the most powerful means of driving sustainable change within global food supply chains is through collaboration and the collective leverage of the food industry as a whole.

FNET

The Company is a member The Food Network for Ethical Trade (FNET) which has been established to improve human rights in global food supply chains through a common approach to managing ethical trade. It aims to support suppliers to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and build a forum for sharing issues and challenges and, in the longer-term, to support the food industry to focus on promoting human rights in global food supply chains. This year the company is a member of the Raw Materials working group and has recently joined the new Agents group.

IPHR

The Indirect Procurement Human Rights (IPHR) Forum is a group of UK retailers, brands and manufacturers with a common vision to protect and respect human rights in supply chains (for goods and services not for resale) and address shared risks.

The company are an active member and are part of the Waste and Recycling Working Group.

The Waste & Recycling Working Group is a cross-sector network of over 20 organisations. The objective is to identify and assess labour rights issues, develop shared resources to address human rights issues in the sector, and to raise awareness and engagement.

Stronger Together

The Company including the UK manufacturing sites are business partners of Stronger Together, a multi stakeholder initiative aiming to reduce modern slavery, particularly hidden forced labour, labour trafficking and other third party exploitation of workers. As business partners we provide evidence to publicly demonstrate the business's commitment to tackling hidden labour exploitation.

ALP

The Association Of Labour Provider not for profit organization promotes responsible recruitment .

SSF

The company is a member of the Sedex Stakeholder Forum (SSF), which brings together manufacturers, brands, retailers, NGO's, auditing bodies and industry experts to discuss challenges in ethical trade and responsible sourcing and solve these problems collaboratively.

As member of these organizations we are able to collaborate and gain understanding of the risks our supply chains.

The Company are actively engaged with our retail customer Ethical teams. Supporting best practice groups and guidance workshops.



Targets

The last 18 months has seen significant changes within the company as we began to bring together separate business under one group, as a part of this we have had to align policies, procedures, structures and whilst doing this sharing best practice. As a result of this activity previous KPI measures have been reviewed. We have developed a set of KPI measures which will effectively measure our processes used to tackle modern slavery within our supply chains.

UK Manufacturing

Modern Slavery %

Suppliers on Sedex or Completed Company SAQ %

Sedex SAQ 100%

Labour Provider Audits completed to schedule

Worker Interviews for Agency number biannually %

Improvement in Stronger Together Business Partner Reporting Tool score

Outsourced Manufacturing

Sites on Sedex or completed company SAQ %

Sedex SAQ 100%

Grievance Mechanism in place

Where labour providers are used auditing in place

Develop of human rights risk assessment improvement score

Our 2023/24 Objectives

- Standardised data capture for suppliers across all group sites which can be centrally accessed.
- Weighting the data for UK and outsourced to ensure that our Risk Assessment is truly reflective and highlights specific areas to target within our supply chain.
- Ethical Risk Assessment to be reviewed annually to illustrate suppliers human rights progress
- Auditing of Labour Providers to have also a targeted audit focusing on specific areas of risk as highlighted through risk assessment.
- Group response plan training of HR & operations
- Site human rights checklist training of NPD colleagues to be completed
- Response plan training to be generated in video format for induction in key roles and those staff where face to face training is not practical.
- Biannual audit of Human Resources data
- Improvement in Stronger Together Business Partner Reporting Tool score

Endorsement

This Statement is made pursuant to section 54(1) of the Modern Slavery Act (2015) and approved on behalf of the Board of Directors of The Compleat Food Group on 10th February 2023.

A handwritten signature in dark brown ink, consisting of several overlapping loops and a long horizontal stroke extending to the left.

Nick Field
Chief Executive Officer