

## **MODERN SLAVERY STATEMENT**

### **INTRODUCTION**

Stateside Foods Ltd is committed to ensuring that there is no modern slavery or human trafficking within our corporate activities or within our supply chains. All potential modern slavery risks related to our business have been evaluated and steps put in place to enforce an effective transparent system.

### **ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS**

Stateside Foods Ltd supplies leading food retailers with both own brand and private label chilled & frozen pizzas.

Our supply chains are predominantly based in Europe, we require all of our suppliers and partners to comply in full with the Modern Slavery Act 2015 and meet our values.

### **POLICIES, STANDARDS AND PRACTICES**

We are a member of Supplier Ethical Data Exchange (SEDEX) and business partners with Stronger Together. We operate the following policies that detail our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

### **TRAINING**

Staff are made aware of the requirements of the Modern Slavery Act 2015 through the site induction programme. HR personnel are trained on identifying and preventing modern slavery.

### **AWARENESS PROGRAMME**

All employees are made aware of the basic principles of the Modern Slavery Act 2015. Key areas include:

- Understanding human trafficking and labour exploitation
- How employers can identify and prevent slavery and human trafficking
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and what external help is available

### **PREVENTING HIDDEN LABOUR EXPLOITATION POLICY**

We are committed to developing and adopting a positive and proactive approach in tackling the hidden exploitation of Migrant Workers. This policy applies to all Stateside Foods Ltd sites and all staff involved in the Recruitment, Managing and Supply of Contractors on a day to day basis.

- We have designated appropriate members of staff which have attended the Identifying Hidden Labour Exploitation training, and have the responsibility for developing company procedures around this subject
- We accept that job finding fees are a business cost to Stateside Foods Ltd and these are paid by Stateside Foods Ltd. The company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee, including overseas labour providers
- All members of staff will ensure that any third party labour supplier will hold a GLA licence and no employee will engage in the use of a third party labour supplier, including overseas labour providers, until this has been approved by the HRD Manager
- We adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gang masters Licensing Authority and the Police. Any reports will be made to the respective authorities via the HRD Manager
- We provide information on tackling “Hidden Labour Exploitation” to our workforce via posters and or leaflets which are displayed in all of the Stateside Foods Ltd sites

## **RECRUITMENT POLICY**

### **Direct Recruitment**

Our recruitment processes includes a facility to identify if applicants are being exploited by asking and recording

- How the worker found out about the work
- Whether the worker has paid anyone, or will have to pay anyone to obtain the work in question
- Whether the worker has paid anyone to get into the UK if newly arrived

We also ensure that testing used during the recruitment process is conducted in a controlled environment with a format that is regularly changed to prevent coaching of individuals.

## **LABOUR PROVIDERS**

Our temporary staff supplier is audited quarterly to ensure that relevant document checks and induction paperwork have been correctly completed for each worker and that the Agency Workers Directive 2012 is being complied with. We also conduct face to face interviews and Stronger Together questionnaires with individual workers.

It is a mandatory requirement that our labour providers are a Stronger Together business partner.

## **SUPPLIER/PROCUREMENT CODE OF CONDUCT**

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code. Non-compliance with the Modern Slavery Act will lead to the termination of the business relationship.

## **REPORTING CONCERNS**

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

## **DUE DILIGENCE**

Stateside Foods Ltd recognises that the principal exposure to Modern Slavery is within the supply chain, we undertake due diligence when considering new suppliers, and review our existing suppliers.

## **REVIEWS INCLUDE:**

- Assessing and reviewing the supply chain to consider their particular product and or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments through questionnaires, which will incorporate compliance with the Modern Slavery Act 2015
- We conduct risk assessments and continuously monitor supplier ethical conduct
- We have been building SEDEX membership progressively across our supply base, all our supply chain is encouraged to demonstrate good ethical practise either by having SEDEX membership or suitable ethical policies

For our supply chain, transparency is currently assessed through SEDEX, with the suppliers linked to us on SEDEX highlighted if they are high risk.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes Stateside Foods Ltd Slavery and Human Trafficking Statement for the foreseeable future.

**APPROVAL**

This statement has been approved by the Managing Director, who will review and update as required.