



2024

MODERN SLAVERY STATEMENT

UPDATED: 2024

DOCUMENT PURPOSE

The UK Modern Slavery Act 2015 requires all businesses to state the actions taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. Avara Foods is one of the largest UK food businesses, supplying major supermarkets and popular restaurants. We manage an extensive supply chain which includes agriculture, processing, and distribution, with a team of over 5,500 people. Our business operates around four core values: being Inclusive, Ambitious, Excelling and operating with Integrity. These four values shape our standards, our decisions, and our expectations.

This update provides an overview of how we continue to reduce the risk of modern slavery in our business. Over the last five years, we have developed the management and controls to reduce the risk of Modern Slavery and Exploitation within our supply chain. The information within this update applies to Avara Foods Ltd and its subsidiary businesses, Faccenda Foods and Freemans of Newent, covering the financial year 1st June 2023 to 31st May 2024. The update can be found on the Avara Foods homepage – www.avarafoods.co.uk.

The past couple of years have been characterised by huge upheaval and change. We, like most others, have been affected by labour availability and inflationary challenges which places exceptional challenges on our business. Against this backdrop, we continue to work to reduce the likelihood of exploitation within our business: educating our people and supply partners, as well as implementing automation to reduce our reliance on unskilled and agency labour.

POLICIES

We have two key policies in place to reduce the risk of modern slavery, our Human Rights policy and Anti Exploitation policy have both been updated the year to support our ongoing work in this area:

- Our [Human Rights policy](#) outlines our strategy to protect our workforce from exploitation.
- Our Anti Exploitation policy goes further in detailing the framework in place to prevent, protect, prepare and pursue employees against cases of exploitation, and the process required should a case be identified.

As part of our ongoing review of our policies we have also reviewed this year the Child Remediation Policy, three recruitment focused policies: Recruitment and Selection Policy, Legal Eligibility to Work Policy and Recruitment Fees and Remediation Policy and the Supplier Code of Conduct.





SECTION 1:

Risk Assessment and Mitigation

UNDERSTANDING AND MITIGATING THE RISK OF MODERN SLAVERY

Understanding and mitigating the risk of modern slavery is key to our ongoing success. In the last year we have taken the following steps to reduce risk:

- We continue to manage our reliance on agency employment and work closely with our agency partners. We have maintained a 12% temporary agency usage. The agency workers continue to be employed on a contract of up to 12 weeks to avoid long term agency working which we know is a factor in modern slavery.
- We encourage our recruitment partners to become Stronger Together Business Partners and utilise the Responsible Recruitment Toolkit (RRT) both promoted by the Association of Labour Providers (ALP). These measures, in addition to our own six-monthly audits of our agencies, provide us with confidence of their own risk mitigation.
- Direct recruitment: We continue to prioritise recruiting new employees directly, rather than via an agency.
- We are an active member of Food Network Ethical Trade (FNET), sponsoring the worker representation initiative as well as participating in the effectiveness and relevance of the Gangmaster Licencing Abuse Authority (GLAA)/Supermarket protocol.
- We are active members of ALP and Stronger Together and have completed the assessment requirements to become a Stronger Together Business Partner.
- Our Modern Slavery Champions have attended the Introduction Stronger Together training this year and members of the Ethical Steering Group have attended both the Advanced Stronger Together.
- We actively use the Responsible Recruitment Toolkit (RRT), currently at 90% progress status, to help shape our recruitment practices. The comprehensive online tool helps to ensure that all workers are recruited in a transparent manner that respects and protects their rights throughout recruitment, work and post-termination.



CHANNELS FOR THE WORKER VOICE

The UN Guiding Principles on Business and Human Rights published in 2011 requires businesses to provide effective grievance mechanisms for victims of human rights abuses.

Establishing effective channels for workers to communicate concern provides a means to identify worker welfare concerns and potential exploitation issues. Channels for effective grievance mechanisms operate on several different levels as shown in figure 1, we provide access to these channels to both employees and agency.

Progress has been made on improving electronic communications, online portals, and a greater focus on 121's and face to face communication, we have engaged colleagues and given them the information and support the need to raise potential issues. We have in parallel both expanded translations of key information and made it widely available, and alongside this continued our support for English language training, utilising several language programmes to improve communication and understanding. This ensures that all our colleagues feel engaged, and no one is excluded.



Figure 1 Channels for the worker voice



SECTION 2:

Due Diligence

SUPPLY CHAIN ENGAGEMENT

The Sedex platform provides visibility throughout the supply chain both upstream to our customers downstream from our suppliers of SAQ's and Smeta audits.

We continue to utilise the Sedex platform to ensure that our supply chain partners have effective controls and that our values are represented. We have 183 suppliers on the Sedex platform, focusing on ingredients and packaging, where we can review SAQ's, risk and Smeta audits.

We utilise the risk assessment tool, to complement formal assessment processes. Our Oracle system provides enhanced data and insight, enabling us to review suppliers and engage with them in a more robust way on a range of subjects, including pre-qualification, ongoing management and communication.



WHISTLEBLOWING SERVICE

Our Whistleblowing service remains available and accessible by colleagues and includes our third-party Farming Partners.

Independently run to ensure anonymity if required, the service is available 24/7 and, while concerns have been raised, none have related to potential modern slavery cases in the last 12 months.



SUPPLIER CODE OF CONDUCT

Recognising that our extended supply chain is an integral part of our business and that its standards must be consistent with our own, we have updated our Supplier Code of Conduct, which forms part of the supplier pre-approval process alongside financial and food safety considerations. Ethical practice is an essential part of this code, and we make clear that suppliers need to meet our expectations.

Our Head of Procurement has completed the CIPS Ethical Procurement and Supply qualification 2022 and all colleagues within procurement have attended the Human Rights & Ethics workshop.



AUDITS

We have moved to a biennial SMETA auditing cycle for all our seven operational sites to align with our customer on standards and to better track progress against key objectives and to ensure that audits are supporting the broader business goals.

Outputs from our internal audits and monthly compliance checks including worker interviews, both colleagues and agency workers, continue to be reviewed and processes updated to reflect these.

Our agency partners play a key role in ensuring we recruit new colleagues in full in accordance with compliance standards. We continue to audit our agencies on an annual basis whilst carrying out our regular in year checks. year within year checks.

We continue to focus on the safety of our employees and engage in both internal and external independent Health & Safety (H&S) audits. These, along with our local Health and Safety Managers, are an important part of engaging with our colleagues helping to maintain our standards; as well as continuously striving for best practice within our industry to keep our people safe.

We run our own Health & Wellness (H&W) centres. Both the H&S and H&W agenda contribute to a culture and climate of care and support which gives confidence to potential victims to reach out for support if they entered our supply chain.

SECTION 3:

Training, Awareness and Next Steps

TRAINING AND AWARENESS

Education on modern slavery, its risks, controls, emerging issues, and best practices has continued at different levels. We have refreshed our training and tailored this to the different touch points throughout a colleague's employment journey from onboarding, with general awareness on what support is available and how to access it, to role specific training for line managers and HR understanding their roles and expectations.

The Human Rights and Ethic Steering Group meets regularly to ensure that our activities are aligned across our operations and with our customers and suppliers. This is a cross functional group ensuring all areas of the business are represented.

EFFECTIVENESS

Our robust control measures mean that the likelihood of infiltration is significantly reduced. First and foremost, we are determined not to be an easy target for traffickers and illegal gangmasters.

Ultimately, effectiveness is determined by the number of instances of modern slavery that go unaddressed within our business.

In our 2019 Modern Slavery update we reported about a live case that we identified and worked with relevant authorities to investigate. We have now successfully detected and supported two cases that have resulted in successful prosecutions by the authorities.

If we have any suspicion that modern slavery is taking place within our supply chain, our priority is to protect the victims, through careful and confidential management of the case and by supporting them into free employment, including elsewhere within our business.

NEXT STEPS

We will continue to participate in networks such as FNET, GLAA working groups, Stronger Together and the ALP, as well as work closely with our retailer Ethical leads, to ensure that we are up to date with best practice and latest intelligence.

We will continue to review the training and development requirements and opportunities available to maintain awareness across the whole of the workforce as well as increasing specialist knowledge across our operation.

Focus is on continuing to develop our approach to managing our supplier's management through Sedex and increasing the requirement on supplier through our Oracle ERP system. We anticipate future SMEATA ethical audits will be completed in the next 12 months.

We are working closely with our procurement team to ensure we are risk assessing our suppliers. The review process of our suppliers' questionnaires has been formalised and we will regularly review these with the procurement team.

Above all, we will continue to develop a people proposition that makes Modern Slavery hard to establish in our business: maximising direct recruitment and employment of colleagues, implementing communication tools that reach all colleagues that tackle the language barrier through translation, and educating and training Avara's leaders and suppliers to be more aware of the challenges and the risks.

Combatting modern slavery remains a major focus at Avara Foods. We have clear management oversight and strong processes to mitigate risk in our business, work hard to ensure that individuals with responsibility are knowledgeable and that everyone in our business feels confident and able to speak up should they feel the need. We also see good news in the audit scores, internal reviews and the feedback from the wider Avara team. Regardless, we remain vigilant and will continue to strive to ensure that modern slavery does not gain a foothold in our business.



Andy Dawkins
Chief Executive Officer
Date: 15/10/2024