Fresh-Pak Chilled Foods – Modern Slavery & Human Trafficking Statement
31st March 2025

1. Definition

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. These crimes include holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Human trafficking can be defined as "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion; of abduction, fraud, deception, 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".

2. Introduction

Modern Slavery is an unacceptable crime that deprives a person's dignity for another person's gain. It is recognised that this is a real problem for millions of people around the world, including in many developed countries. Every company is at risk of being directly or indirectly involved in this crime through its own operations and supply chain.

Fresh-Pak Chilled Foods Ltd has a zero-tolerance approach to modern slavery and is committed to preventing such acts within our organisation and supply chain. We have taken steps to tackle modern slavery, and these are outlined in our statement.

Fresh-Pak Chilled Foods Ltd will not knowingly use suppliers or labour providers that exploit job applicants/workers and will report any allegations to the relevant authorities.

3. Organisational structure and supply chains

Fresh-Pak Chilled Foods Ltd is the producer of sandwich fillings, hard boiled/poached eggs, and dips. Based in Barnsley, South Yorkshire, we supply grocery multiples, high street retailers, food service outlets, food manufacturers and other commercial customers nationwide.

Fresh-Pak Chilled Foods Ltd 1st tier suppliers are located throughout the UK and Europe.

- UK
- Ireland
- Germany

- Spain
- Netherlands
- Greece
- Belgium
- Sweden

Raw materials are sourced through these 1st tier suppliers are procured from the following countries of origin:

Belgium	Iceland	Peru
Brazil	India	Spain
Canada	Indonesia	Thailand
China	Ireland	Turkey
Denmark	Italy	United Kingdom
Ecuador	Lithuania	Vietnam
France	Maldives	
Germany	Netherlands	
Greece	Norway	

4. Supplier questionnaire

All existing suppliers have completed an Ethical questionnaire and where applicable have supplied details of SEDEX membership.

All suppliers are linked on SEDEX, any that are not members of SEDEX complete an Ethical Questionnaire.

5. Supplier due diligence

Fresh-Pak Chilled Foods Ltd conducts due diligence on all new suppliers. This involves either reviewing audit results for 2nd tier suppliers or auditing the premises of 1st tier suppliers. This includes:

- Health & Safety Standards
- Food Safety Standards
- Labour Standards (ETI base code)
- Requiring improvement for any substandard practices

6. Training

Fresh-Pak Chilled Foods Ltd has incorporated Modern Slavery training into its induction programme and conducted training for all current employees. All 3rd party agency workers are required to undergo modern slavery training prior to commencing work. All the Senior Management team have received Stronger Together training, having attended the Tackling Modern Slavery in UK Business workshop.
Front line Management and Supervisors have also received the Tackling Modern Slavery in the UK (Supervisors) e-learning module.

7. Awareness

Fresh-Pak Chilled Foods Ltd has raised the awareness of modern slavery by briefing employees and displaying posters, which explain how to spot the signs of modern slavery and details of how to report cases of suspected or actual modern slavery.
Fresh-Pak Chilled Foods Ltd is a Stronger Together Business Partner and an associate member of the ALP.

8. Relevant Policies

Fresh-Pak Chilled Foods Ltd operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent modern slavery and human trafficking in its operations:

- Preventing Hidden Labour Exploitation policy: Fresh-Pak Chilled Foods Ltd has committed to developing and adopting a proactive approach to hidden labour exploitation.
- Whistleblowing policy: Fresh-Pak Chilled Foods Ltd has a documented policy for reporting any concerns related to the direct activities, or the supply chains of the organisation. This includes concerns relating to modern slavery. The whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- Employee Code of Conduct: Fresh-Pak Chilled Foods Ltd makes it clear to employees the actions and behaviour expected of them when representing the organisation, through this code. Fresh-Pak Chilled Foods Ltd strives to maintain the highest standards of employee conduct and ethical behaviour.

- Supplier Code of Conduct: Fresh-Pak Chilled Foods Ltd requires all suppliers to follow the ethical, environmental and legal standards needed when doing business with Fresh-Pak.
- Recruitment/Agency workers: Fresh-Pak Chilled Foods Ltd uses only specified, reputable employment agencies. Any new agency is audited and verified prior to commencement. Recruitment agencies are audited twice yearly by the HR Department, part of the audit process is to conduct worker interviews and address checks.
- Ethical Trading Policy: Fresh-Pak Chilled Foods Ltd aims to protect the customer, maintain its integrity and ensure that materials sourced for Fresh-Pak comply with recognised human rights standards so far as is reasonably practicable.
- Human Rights Policy- in 2024 Fresh-Pak Chilled Foods Ltd implemented a new Human Rights Policy to highlight the business responsibility to respect human rights and the ability to contribute to positive human rights impacts.

9. Responsibility

Overall responsibility for Fresh-Pak Chilled Foods Ltd labour exploitation initiatives lies with the board of directors.

Specific areas of responsibility are outlined below:

People/Employment Policies:	HR Department – Head of HR
Labour Suppliers:	HR Department – Head of HR
Recruitment:	HR Department – Head of HR
Supplier Risk Assessments:	Technical Department-Raw Materials Manager
Supplier Audits:	Technical Department – Raw Materials Manager
New Supplier Questionnaires:	Technical Department – Raw Materials Manager
Training:	HR Department – L& D Partner

10. Performance Indicators

The organisation set the following performance indicators for the years 2024/25 and highlights of those goals are set out below.

- Assess supplier questionnaires on ethical compliance. **This has been completed.**
- Target 100% supplier relationship on SEDEX. **96% has been achieved (v 90% the previous year).**

- Assess compliance of supply chain against the Ethical Trading Policy. **This has been successfully assessed.**
- Identify high risk suppliers/sources and conduct risk assessments where appropriate. **No high-risk suppliers have been identified**.
- Continue to invest in Training and awareness of the impact of Modern Slavery. Completed through training for the Senior Leadership team and the implementation of the Supervisory module. **All first line Managers have received this training**
- Induction training is completed for all colleagues including Agency workers.
- Ongoing support of Stronger Together and Business Partner status.
- **Human Rights Policy introduced in 2024**

This statement has been approved by the organisation's Chief Executive.



Mr T. Brinsmead

Chief Executive – Fresh-Pak Chilled Foods Ltd