Flying Trade Group

Anti-Slavery and Human Trafficking Statement

Introduction

As part of our culture of good governance for best and ethical business practices, Flying Trade Group operates to a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers and employees. We adopt best practice behavioural values for such business relationships. Core to this is our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report any concerns and management are expected to act upon them.

Our attitude to modern slavery is: **zero tolerance.**

We are committed to acting ethically and with integrity in all our business dealings and relationships and implementing and enforcing effective systems and controls ensuring modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

Group Structure

Flying Trade Group is a UK based business group with operations across several sectors including food, hotel, leisure and property development and management.

Whilst it operates around the globe the group is best known for its UK operations, which account for the largest part of its commercial activities.

The group has its head offices in the UK and operates Flying Trade Limited, Cawoods Fish Curers Limited, Surya Rice Limited, Surya Hotels Limited, Flying Leisure Limited, Creative Marketing Ideas Limited, Flying Trade (India) Private Limited (India subsidiary), Salaam Foods SRL (Romania subsidiary) and Surya Foods Ireland Limited (Ireland subsidiary).

Our Supply Chains

Our supply chains include the production and sourcing of raw materials principally related to the provision of rice and world foods.

We expect our suppliers to have suitable anti-slavery and human trafficking policies, and to operate effective means of disclosure within their organisation.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any other part of our business. Our approach to anti-slavery reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking

In order to assess the risk of modern slavery, we use the following processes:

- Engage with our suppliers both to convey to them our approach to anti-slavery and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- Review the potential for risk including Supplier Approval Questionnaires which require Supplier declarations relating to; Freely chosen employment i.e. not forced or bounded, safe & hygienic conditions, employment of children, wage rates in accordance with national laws, working hours in accordance with national laws, equality and policies measures they take with their suppliers.
- All of our employees have an obligation to familiarise themselves with our company policies to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented.

- We conduct a robust recruitment process in line with UK legislation, including right to work document checks, contracts of employment and ensuring that information provided is genuine and held securely and confidentially.
- Adherence to this forms part of all employees' obligations under their contract of employment. Supporting information and further guidance is contained within the Employee Handbook.
- We have a process for reporting slavery and human trafficking as detailed in our Whistle blowing policy which includes a confidential channel for employees to report concerns in our business. Following an assessment in early 2021, as a further demonstration of our commitment, the Company engaged the services of an externally managed Whistle blowing service provider.
- We will protect Whistle blowers.
- Sedex is a leading responsible sourcing platform recognised globally for building ethical supply chains with a view to positively impacting the lives of workers. Sedex registration and approval was gained within certain entities of the foods production and distribution businesses in 2021/2022.

New Initiatives & Continual Improvement

- We are committed to continue to develop our food safety and quality culture by clear open honest communication, listening to employee feedback and treating staff with respect.

Our Policies

Flying Trade Group's Modern Slavery Statement, along with our Anti-bribery, Corruption, Fraud, Whistle-blowing, Recruitment and Equal Opportunities policies reflect our commitment to acting ethically and with integrity in all aspects of our business activities.

Review

This Anti-Slavery and Human Trafficking Statement will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time. The statement will be available on the group website.

This statement is approved on behalf of the Board of Directors on 3rd April 2023.

Signed:

Suki Dulai
CEO

Signed:

Harry Dulai
Managing Director