KANES FOODS



MODERN SLAVERY STATEMENT



FINANCIAL YEAR 2024
(PUBLISHED DATE : SEPTEMBER 2024)

MANAGING DIRECTOR'S STATEMENT



AS ONE OF THE LARGEST EMPLOYERS IN WORCESTERSHIRE PEOPLE ARE AT THE VERY HEART OF WHAT WE DO.

MODERN SLAVERY SHOULD NOT HAVE ANY PART IN OUR SOCIETY UNFORTUNATELY IT IS SOMETHING THAT WE MUST BE AWARE OF AND CONSIDER.

IN THE COMING YEAR, AND IN LINE WITH OUR CONTINOUS IMPROVEMENT KANES REMAINS COMMITTED TO STANDING UP TO HUMAN RIGHTS INJUSTICES THROUGH ETHICAL BUSINESS PRACTICES AND DOING EVERYTHING IT CAN TO MITIGATE RISKS OF MODERN SLAVERY TO OUR WORKERS.

DIVERSITY AND INCLUSION ARE IMPORTANT IN OUR BUSINESS STAFFING POLICIES, AND WE WILL CONTINUE TO ENSURE SAFE OPPORTUNITIES FOR OUR COLLEAGUES. WE WILL CONTINUE TO PROMOTE A POSITIVE CULTURE WITHIN KANES WHERE COLLEAGUES FEEL HEARD.

IT IS ALSO A NECESSITY THAT ALL WORKERS WITHIN OUR SUPPLY CHAIN ARE TREATED WITH RESPECT AND DIGNITY AND ARE FREE FROM THREATS, INTIMIDATION AND EXPLOITATION.

THIS MODERN SLAVERY STATEMENT SUMMARISES THE STEPS WE HAVE TAKEN SO FAR AND OUTLINES OUR COMMITMENTS AS WE WORK TOGETGHER TO ENHANCE HUMAN RIGHTS AND END EXPLOITATION.



I R Schmid

IAN SCHMID

MANAGING DIRECTOR

STRUCTURE & OVERVIEW

KANES IS A LEADING PRODUCER OF PREPARED MEAL SOLUTIONS, SUPPLYING THE UK RETAIL MARKET FROM OUR 28 ACRE SITE IN WORCESTERSHIRE.

OUR MISSION IS
TO DELIGHT OUR CUSTOMERS WITH INDUSTRY LEADING QUALITY, SERVICE AND VALUE, ALWAYS ACTING ETHICALLY AND RESPOSIBLY.'

WE ARE COMMITTED TO DEVELOPING OUR PEOPLE AND PROVIDING LONG-TERM, SECURE EMPLOYMENT AND GROWTH OPPORTUNITIES.

STRATEGY AND STATEMENT

THIS STATEMENT RELATES TO ACTIONS AND ACTIVITIES DURING THE FINANCIAL YEAR 1ST APRIL 2023 TO 31ST MARCH 2024 .

OUR STRATEGY IS BASED ON FOUR PRINCIPLES, ALONG WITH THE CORE BUSINESS VALUES.

PREVENTION
DUE DILIGENCE
MANAGEMENT
COMMITMENTS

EFFECTIVE POLICIES & PROCESSES

PROTECTING VICTIMS & LEGAL INTEGRITY

WIDESPREAD AWARENESS & TRAINING

TARGETS FOR THE NEXT FINANCIAL YEAR

HONEST
TRUTHFUL, ETHICAL AND FAIR TO ALL.

RESPECTFUL
BE KIND, COURTEOUS WITH OPEN COMMUNICATION, WHERE DIFFERENCE IS ACKNOWLEDGED AND VALUED.



UNITED
JOINED TOGETHER TO WORK AS ONE TEAM SHARING KNOWLEDGE, AND COMBINE WITH THE STRENGTHS OF OTHERS.

PROACTIVE
ANTICIPATE PROBLEMS ENGAGE IN CHANGE AND PLAN FOR POSITIVE FUTURE RESULTS.

PREVENTION

POLICY & PROCESS FRAMEWORK

OUR POLICY SUPPORTS KANES FOODS COMMITMENT TO TACKLING MODERN SLAVERY, AND IS REVIEWED ON A REGULAR BASIS IN ORDER TO MAINTAIN OUR HIGH STANDARDS OF DUE DILIGENCE AND CONTINOUS IMPROVEMENT. THE RELEVANT LEADERS OF THE HR, TECHNICAL, PURCHASING AND OPERATIONS FUNCTIONS ARE RESPONSIBLE FOR THE IMPLEMENTATION, DEVELOPMENT, AND ON-GOING MAINTENANCE OF THE POLICY WITHIN THEIR RESPECTIVE BUSINESS UNITS.

MODERN SLAVERY & HIDDEN EXPLOITATION

OUR MODERN SLAVERY AND HIDDEN EXPLOITATION POLICY OUTLINES KANES FOOD LTD MEASURES IN PLACE TO PREVENT MODERN SLAVERY AND EXPLOITATION

HUMAN RIGHTS POLICY

THE HUMAN RIGHTS POLICY SETS OUT OUR COMMITMENT TO RESPECTING HUMAN RIGHTS IN LINE WITH PRINCIPLES AND STANDARDS SET BY UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS (UNGPS). THE ETHICAL TRADING INITIATIVE BASE CODE (ETI BASE CODE) PROVIDES THE SUPPORTING STRUCTURE WITHIN WHICH OTHER POLICIES RELATING TO MODERN DAY SLAVERY AND LABOUR EXPLOITATION SIT.

RESPONSIBLE LABOUR PROVIDERS POLICY

WE OPERATE A ROBUST RECRUITMENT PROCESS, INCLUDING CONDUCTING ELIGIBILITY TO WORK IN THE UK CHECKS FOR ALL EMPLOYEES TO SAFEGUARD AGAINST HUMAN TRAFFICKING OR INDIVIDUALS BEING FORCED TO WORK AGAINST THEIR WILL.

WE COLLABORATE BOTH INTERNALLY AND EXTERNALLY TO ASSESS ALL LABOUR PROVIDERS FOR POTENTIAL RISKS OF LABOUR EXPLOITATION OR BREACHES OF COMPANY STANDARDS AND COMMITMENTS.

WHISTLEBLOWING POLICY

THE ORGANISATION'S WHISTLEBLOWING PROCEDURE IS DESIGNED TO MAKE IT EASY FOR WORKERS TO MAKE DISCLOSURES, WITHOUT FEAR OF RETALIATION.

WE ENCOURAGE ALL WORKERS, CUSTOMERS, AND BUSINESS PARTNERS TO REPORT ANY CONCERNS THEY HAVE. WE SUPPORT SEVERAL LANGUAGES AND ANONYMOUS SUBMISSIONS IF PREFERRED.

THESE POLICIES APPLY THE PRINCIPLES AND PROTOCOLS OF STRONGER TOGETHER.

ETHICAL TRADING

AS A RESPONSIBLE BUSINESS, KANES FOODS ARE COMMITTED TO WORKING TO THE PRINCIPLES AND STANDARDS OF THE ETI BASE CODE AND THE FAIR TREATMENT OF ALL WORKERS AND THOSE IN ITS DIRECT SUPPLY CHAIN.

SEDEX: KANES IS A MEMBER OF SEDEX ,SHARING ETHICAL TRADING INFORMATION WITH CUSTOMERS. WE EXPECT ALL OUR SUPPLIERS TO HAVE ETHICAL PROCESSES AND POLICIES IN PLACE THROUGHOUT THEIR SUPPLY CHAIN AND MANUFACTURING OPERATIONS. AS PART OF OUR COMMITMENT TO ETHICAL TRADING, SUPPLIERS ARE REQUESTED TO REGISTER WITH SEDEX. WE WILL MONITOR SUPPLIER COMPLIANCE WITH THIS POLICY THROUGH THE SEDEX PLATFORM.

SMETA AUDIT: KANES COMPLIES WITH THE SEDEX MEMBERS ETHICAL TRADING AUDIT'S MEASUREMENT CRITERIA AND IMPLEMENTS BEST PRACTICE GUIDELINES .

ETI BASE CODE: AT KANES WE WORK TOWARDS IMPLEMENTING THE CLAUSES IN THE ETI BASE CODE, AN INTERNATIONALLY RECOGNISED CODE OF LABOUR PRACTICE, FOUNDED ON THE CONVEVTIONS OF THE INTERNATIONAL LABOUR ORGANISATION (ILO). KANES IF AUDITED AGIANT THE ETI BASE CODE.

DUE DILIGENCE AND RISK MITIGATION

DUE DILIGENCE, RESPONSIBLE RECRUITMENT, AWARENESS RAISING & COMMUNICATION

EFFECTIVE MANAGEMENT OF THE BUSINESS AS WELL AS ITS LABOUR SUPPLY CHAIN IS PARAMOUNT TO ENSURING BEST PRACTICE AND COMPLIANCE.

LABOUR PROVIDERS ARE REQUIRED TO HAVE A GANGMASTERS AND LABOUR ABUSE AUTHORITY (GLAA) LICENCE AND FOLLOW THE PROVISIONS OF THE GANGMASTERS (LICENSING) ACT 2004 AND THE IMMIGRATION ACT 2016. THE ROLE OF THE GLAA IS TO PROTECT VULNERABLE AND EXPLOITED WORKERS.

KANES FOODS IMPLEMENTS INTERNAL AND EXTERNAL ETHICAL AUDITS TO ENSURE COMPLIANCE AND MAINTENANCE OF OUR STANDARDS FOR THE CONDITIONS OF OUR WORKERS. THE AUDIT FRAMEWORK COMPARES SYSTEMS AGAINST ETI BASE CODE, EMPLOYMENT LAW AND POLICIES. OUR BUSINESS HAS AN ACTION PLAN THAT ENABLES NON COMPLIANCE TO BE DEALT WITH PROMPTLY AND EFFECTIVELY, WORKING TOGETHER TO DEVELOP BEST PRACTICE INITIAVES.

OUR APPROVED SUPPLIER LIST REQUIRES ADHERANCE TO ETHICAL STANDADS AND EMPLOYMENT LAW, LABOUR PROVIDERS ARE RISK ASSESSED TO IDENTIFY POTENTIAL AREAS OF RISK OF LABOUR EXPLOITATION OR BREACHES OF COMPANY STANDARDS & COMMITMENTS.

HIGHER RISK AREAS:

THE GREATEST RISK OF MODERN SLAVERY IN OUR BUSINESS IS IN RECRUITMENT PROCESSES. LABOUR PROVIDER MANAGEMENT IS CORE TO BUILDING RESPONSIBLE RECRUITMENT PROCESSES, WITHIN OUR RESPONSIBLE RECRUITMENT POLICY.
THE PURPOSE OF OUR RESPONSIBLE USE OF LABOUR PROVIDERS POLICY IS TO HAVE A DOCUMENTED AND STRUCTURED LABOUR PROVIDER MANAGEMENT PROCEDURE TO ENSURE THAT ALL LABOUR PROVIDERS ARE FULLY RISK ASSESSED TO IDENTIFY POTENTIAL AREAS OF RISK OF LABOUR EXPLOITATION OR BREACHES OF COMPANY STANDARDS & COMMITMENTS AND GLAA LICENSING STANDARDS.

RISK ASSURANCE THROUGH:
TENDER PROCESS FOR THE SELECTION OF EXTERNAL RECRUITMENT AGENCIES
AUDIT AND APPROVAL OF ALL EXTERNAL AGENCIES
SERVICE LEVEL AGREEMENTS IN PLACE WITH ALL EXTERNAL PARTNERS
ALL LABOUR PROVIDERS ARE AUDITED AT LEAST ANNUALLY,
STRUCTURED INDUCTION AND TRAINING PROCESSES.



MANAGEMENT

TRAINING AND AWARENESS

OUR AWARENESS PROGRAMME HAS BEEN DESIGNED TO BUILD AWARENESS AND UNDERSTANDING OF LABOUR EXPLOITATION AND MODERN SLAVERY RISKS AND INDICATORS.

MODERN SLAVERY AND EXPLOITATION IS CONSTANTLY EVOLVING, BY REVIEWING AND UPDATING OUR TRAINING MATERIALS REGULARLY, WE MITIGATE RISK AND PROTECT PEOPLE.

INDUCTION LEVEL

ALL OUR COLLEAGUES AT KANES FOODS LTD AND ALL OUR AGENCY WORKERS COMPLETE BASIC ETHICS TRAINING AT INDUCTION.

STRONGER TOGETHER TRAINING, CONTAINING INFORMATION ON WORKERS' RIGHTS, GRIEVANCE MECHANISMS AND MODERN SLAVERY. THIS ALSO INCLUDES, HOW TO PREVENT AND FLAG SLAVERY AND HUMAN TRAFFICKING, ALONG WITH WHAT EXTERNAL HELP IS AVAILABLE.

MODERN SLAVERY AWARENESS

THE PURPOSE OF THIS IS TO HELP RAISE AWARENESS AND IMPROVE EDUCATION ON THIS TOPIC. BUILDING A CLEAR UNDERSTANDING OF MODERN SLAVERY AND POTENTIAL INDICATORS WITH AS MANY COLLEAGUES AS POSSIBLE, AND CLEARLY COMMUNICATE CORRECT LINES OF REPORTING ANY CONCERNS.

TRAINING MATERIAL IS PERIODICALLY SHARED ON KANES FOODS COLLEAGUE ENGAGEMENT PLATFORM . STRONGER TOGETHER EDUCATION AND AWARENESS VIDEOS ARE SHARED ON THE TV SCREEN IN THE CANTEEN.

OUR HR TEAM HAVE COMPLETED THE STRONGER TOGOTHER TACKLING MODERN SLAVERY IN BUSINESS.

KEY MEMBERS OF OUR HR TEAM HAVE COMPLETED STRONGER TOGETHER INTRODUCTION TO RESPONSIBLE RECRUITMENT TRAINING.
THIS ENSURES CONSISTENT IMPLEMENTATION OF VARIOUS RECRUITMENT PROCEDURES BY BUILDING AN UNDERSTANDING OF THE NATURE AND IMPACT OF RISKS DURING RECRUITMENT

EFFECTIVE HUMAN RIGHTS DUE DILIGENCE IN SUPPLY CHAINS

A NUMBER OF OUR PROCUREMENT, TECHNICAL AND HUMAN RESOURCES TEAMS HAVE COMPLETED THE STRONGER TOGETHER EFFECTIVE HUMAN RIGHTS IN SUPPLY CHAINS TRAINING.



SUPPLY CHAIN MANAGEMENT & DUE DILIGENCE

KANES FOODS LTD SUPPLY CHAIN IS LARGE AND COMPLEX AND INVOLVES A RANGE OF DIFFERENT LANGUAGES, CULTURES, LEGISLATIVE REGIMES, ECONOMIC ENVIRONMENTS AND APPROACHES TO HUMAN RIGHTS.
WE RECOGNISE THAT MODERN SLAVERY AND LABOUR EXPLOITATION EXISTS, AND ALTHOUGH WE CAN HELP TO EDUCATE AND INFLUENCE OUR SUPPLY CHAIN TO REDUCE RISKS, IT MAY STILL OCCUR. WE ARE COMMITTED TO DOING ALL WE CAN TO MANAGE AND MINIMISE SUCH RISKS.

WE SEEK TO DEVELOP LONG-TERM RELATIONSHIPS WITH OUR SUPPLIERS BASED ON THE PRINCIPLES OF FAIR, OPEN, AND HONEST DEALINGS AT ALL TIMES. ONLY SUPPLIERS THAT SHARE THESE PRINCIPLES AND CAN DEMONSTRATE COMPLIANCE TO ETHICAL STANDARDS WILL BE CONSIDERED APPROPRIATE TO TRADE WITH KANES FOODS.

ALL ETHICAL DUE DILIGENCE REQUIREMENTS FOR SUPPLIERS ARE DEFINED IN THE KANES FOODS SUPPLIER APPROVAL PROCEDURE.

AS A BASELINE, ALL PRODUCE SUPPLIERS MUST REGISTER ON THE SUPPLIER ETHICAL DATA EXCHANGE (SEDEX) AND COMPLETE THEIR SELF-ASSESSMENT QUESTIONNAIRE (SAQ) TO PROVIDE GREATER TRANSPARENCY, IMPROVED SUPPLY CHAIN MANAGEMENT AND MONITORING OF SYSTEMS.

SAQ RESPONSES ARE MONITORED AND ASSESSED WITH THE SUPPORT OF THE SEDEX RADAR TOOL, WHICH SUPPORTS IDENTIFYING SUPPLIERS OPERATING IN HIGH-RISK WORKING ENVIRONMENTS AND THOSE MORE VULNERABLE TO LABOUR EXPLOITATION.



TARGETS 2024/2025

OVER THE NEXT YEAR, WE WILL BUILD ON THE PROGRESS WE HAVE MADE AND CONTINUE TO UPHOLD OUR COMMITMENT TO ADDRESSING MODERN SLAVERY AND LABOUR EXPLOITATION WITHIN A WIDER HUMAN RIGHTS FRAMEWORK.

IN PARTICULAR, THE FOCUS AND TARGETS FOR 2024-25 WILL INCLUDE:

CONTINUALLY MONITORING, REFINEMENT AND REVIEW OF THE EFFECTIVENESS OF OUR PROCESSES AND ACTIONS RELATED TO MODERN SLAVERY, LABOUR EXPLOITATION AND SUPPLY CHAIN DUE DILIGENCE.

REVIEWING AND UPDATING RELEVANT POLICIES.

IMPROVEMENT OF OUR TRAINING - OUR MODERN SLAVERY AWARENESS AND TRAINING REQUIREMENT WILL CONTINUE TO EXPAND, ADDING NEW STAKEHOLDERS AND INCREASING THE SCOPE OF MATERIALS.

ONGOING REVIEW AND UPDATES OF AUDIT AND RISK ASSESSMENT TOOLS FOR AGENCIES

INCREASED DUE DILIGENCE WITHIN OUR SUPPLY CHAIN.

OVER THE NEXT 12 MONTHS OUR INTENTION IS TO WORK TOWARDS BECOMING BUSINESS PARTNER STATUS WITH STRONGER TOGETHER.

CONTINUED REVIEW OF RISK.

DECLARATION

THIS STATEMENT HAS BEEN REVIEWED BY THE BOARD OF DIRECTORS AND IS AUTHORISED ON BEHALF OF THE BOARD BY IAN SCHMID, MANAGING DIRECTOR 18/9/2024 WHO WILL REVIEW AND UPDATE IT ANNUALLY.

IAN SCHMID. MANAGING DIRECTOR