

Modern Slavery Statement 2024

Bakkavor

Chief Executive's Introduction

As the UK's leading provider of fresh prepared food, at Bakkavor we are clear about our responsibilities and the example we must set within our industry.

Senior accountability for human rights is critical. The Bakkavor Board has ultimate responsibility for human rights and our wider ESG activities and the ESG Committee has oversight of the Group's ESG strategy, Trusted Partner, and its execution. On a day-to-day basis the Responsible Sourcing Governance group is part of our ESG strategic governance and monitors these topics.

Across Bakkavor, we are committed to maintaining the highest standards of employee welfare and safety. In addition, as a resilient supply chain is critical for our business, we are also clear with our suppliers of our expectation and requirements with regards to upholding and safeguarding human rights in the supply chain. As such we work with our supply base to ensure they can meet the standards required through our Supplier Code of Conduct.

Our values are core to everything that we do and will never be compatible with any form of modern slavery. That is why we raise awareness and action on this issue through internal campaigns and ongoing training programmes that aim for our people to be able recognise the indicators of modern slavery and how to report them.

Bakkavor is also an active partner of Stronger Together, the multi-stakeholder initiative that aims to tackle modern slavery through training and information sharing and we value their expertise in supporting our benchmarking, training and awareness programmes. In 2023 we retained our Stronger Together Business Partner 'Advanced' status as well as achieving Responsible Recruitment 'Business Partner' status for the first time.

We are proud of the work we have done and continue to do in this area, but we are not complacent. Our annual review process looks at what more we can do to meet the highest ethical standards for all our stakeholders.



Mike Edwards

CEO, Bakkavor Group plc

27 June 2024



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Introduction

About this statement

This statement is Bakkavor’s latest Modern Slavery Statement and relates to the year ending 31 December 2023. In scope it covers Bakkavor Group plc and Bakkavor Foods Limited, referred to as “Bakkavor” throughout this Statement. In this statement we set out the activities we have undertaken in 2023 to tackle the issue of modern slavery within our UK business and down our supply chain.

Our Business and Supply Chains

Bakkavor is a leading provider of fresh prepared food. We operate from 44 sites and develop and manufacture over 3,000 different fresh prepared food products.

We source from around 1,300 suppliers located around the world – from small farmers to multi-national operators. They, in turn, work with thousands of their own suppliers who grow and move hundreds of raw materials across global supply chains. Underpinning the safety of our products ensures the integrity of this supply chain, all the way from an initial risk assessment through to supply chain mapping.

Our values

We are proud to be a values-led business. Our vision and purpose are underpinned by these values and are the foundation of our culture.



PROUD TO LIVE OUR VALUES



Our commitment to help end modern slavery reflects our values. In particular, we are committed that our supply chain operations should have a positive impact, creating opportunities for people all over the world.

Our ESG strategy

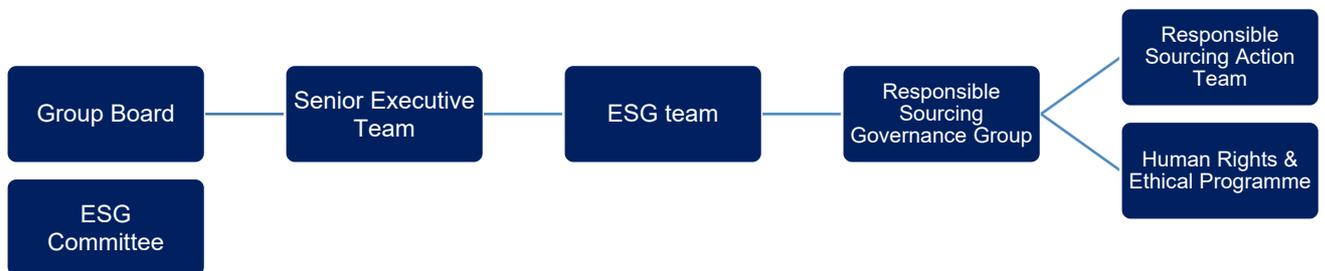
Trusted Partner is our ESG (Environment, Social and Governance) strategy that guides our progress towards a more sustainable business.

Bakkavor takes its responsibility to build a sustainable business seriously. Our Trusted Partner Strategy is built around three focus areas:



- 1. Responsible Sourcing** in our supply chain
- 2. Sustainability and Innovation** in our operations
- 3. Engagement and Wellbeing** in our workplaces and communities

Our ESG Governance structure includes ethical trade and human rights in our own operations and supply chain and reports into the ESG team:



We published our second [ESG report](#) which contains a detailed overview of our Trusted Partner strategy and the progress we have made against our ESG objectives and activities in 2023.



- **Trusted Partner Responsible Recruitment and Employment commitments** Drive awareness and action on the issue of modern slavery, rolling out campaigns and training so that our colleagues know the indicators and how to report them (ongoing).
- Work with industry partners to share best knowledge and collaborate on responsible recruitment and employment practices.

- Trusted Partner Responsible Sourcing commitments**
- Work collaboratively with suppliers on any breaches of our Code of Conduct to develop and implement a clear and appropriate corrective action plan (UK).

Our Ethical Trade and Human Rights Governance

Board responsibility for ethical trade and human rights is as set out below:

<p>Board</p> <p>Overall responsibility for ethical trade and human rights including the signing of Bakkavor's Modern Slavery Statement</p> <p>Chief Executive Officer: Mike Edwards</p>	
<p>Bakkavor Internal Operations</p> <p>Responsibility within Bakkavor sites</p> <p>Chief People Officer: Donna-Maria Lee</p>	<p>Bakkavor Supply Chain</p> <p>Responsibility in the Bakkavor supply chain</p> <p>Chief Executive Officer: Mike Edwards</p>

Internal ethical trade team

The Bakkavor Human Rights and Ethical Programme is driven by our internal ethical trade team, formed of a nominated Head of Human Resources, two Senior HR Business Partners and an external ethical trade specialist.

The team's purpose is to ensure that our own operations understand and comply with the required ethical standards, to develop ethical policies and processes, provide training and support, and to develop and agree the Bakkavor's ethical trade and modern slavery action plans.



Responsible Sourcing Governance group

The Responsible Sourcing Governance group sets the direction on strategy and policies for Bakkavor.

The Responsible Sourcing Action Team implements the strategy and policies and ensures that progress is tracked and managed.

These are valuable forums for building the capacity of the UK businesses to stay informed of emerging threats and ensure the business is well positioned to respond to these.

Risk assessments and audits within our own operations

Our approach to risk assessments and audits remains unchanged, and we constantly assess our own operations, including for potential risks.

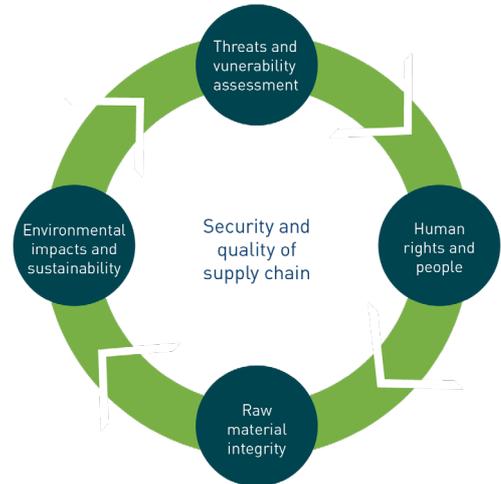
Other relevant policies

The following policies underpin our approach to tackling Modern Slavery in our own business and our supply chain:

- Ethical Trade and Human Rights Policy
- Internal Human Rights and Ethical Trading Policy (Updated 2023)
- Anti- Bribery and Business Ethics Policy
- Bakkavor Code of Conduct
- Inclusion and Diversity Policy
- Whistleblowing Policy
- Supplier Code of Conduct (Updated 2023)
- Anti-Money Laundering Policy
- Group Remediation Policy
- Forced Labour Response Plan Policy (Updated 2023)
- Resourcing and Recruitment Policy (updated 2023)

Responsible Sourcing

Risk assessment - Own operations and supply chain





Human Rights and Ethical Trade Programme

The Bakkavor Human Rights and Ethical Trade Programme brings together all the activities undertaken at group and site level into a common framework:



The programme is reviewed annually and updated as required. In 2023, the focus continued to be on embedding and operationalising.

The programme identifies our risk assessment and audit activities in our own operations:

- **Internal ethical audit process** – supports our own sites to embed our Human Rights and Ethical Trade Programme. In 2023, four sites completed this process.
- **SEDEX SAQ and RADAR risk rating** – all Bakkavor sites in the UK complete the SAQ and update annually. At the end of 2023, all UK sites had achieved a low-risk rating.
- **SEDEX AB member** – we are an active Buyer/Supplier (AB) member of SEDEX playing a leadership role in SEDEX which includes providing feedback on our experiences of using the platform as well as input into their system development programme.
- **Third party SMETA audits** – our own sites complete a third party SMETA audit every 4 years or sooner if required by our customers (most do not require this for low-risk suppliers). In 2023, nine sites completed a SMETA audit. We take a zero-tolerance approach to non-compliances, and close them out as soon as possible.
- **Modern Slavery risk assessment process** – this is our Bakkavor specific internal annual risk assessment process and designed to provide each site with a modern slavery risk rating:



Risk Rating	Assessment	Score Range
High Risk	Very likely to have issues of modern slavery	<33%
Medium Risk	Possible there are some issues of modern slavery	33% - 63%
Low Risk	Unlikely to have issues of modern slavery	>67%

Our overall modern slavery risk rating has improved from 63% to 66%. This represents spread of risk scores across our sites – that is – mostly low with some medium risk sites.

- **Stronger Together Good Practice Implementation Checklist** – Bakkavor has worked with [Stronger Together](#) since 2013 and actively supports the development of training, guidance, and toolkits. The checklist enables us to measure how well we are delivering our Human Rights and Ethical Trade programme. Alongside our Modern Slavery risk assessment process, all sites complete this [checklist](#) on an annual basis.
- **Stronger Together Progress Monitoring Tool** – Completed at group level, this is an online self-assessment that supports companies to measure their progress and to highlight their next steps in addressing modern slavery risks within their businesses and supply chains. One of our key performance indicators, we are pleased to report that Bakkavor’s overall score has increased to 79%.
- **Stronger Together Business Partner** – evidence is uploaded to publicly demonstrate our commitment to tackling modern slavery. We are pleased to report that we maintained our Business Partner Advanced Verified status in 2023.
- **Responsible Recruitment Business Partner** – evidence is uploaded to publicly demonstrate our commitment to responsible recruitment. We are pleased to report that we achieve Business Partner Status in 2023.
- **‘Speak Up’ whistleblowing hotline** – ‘Speak Up’ enables all employees, including agency workers, to raise any potential concerns anonymously and confidentially including those relating to modern slavery. Cases logged in 2023 were investigated thoroughly by site HR colleagues and senior management. Information about the whistleblowing hotline is prominently displayed at all sites. In addition, whistleblowing is monitored by the Board at each Board meeting.
- **Third party labour provider annual audits** – labour providers supplying more than ten workers are required to complete our annual audit. This is be-spoke to Bakkavor and covers a management systems review, financial due diligence check, review against Bakkavor’s terms of business, recruitment fee risk assessment, review of grievance procedures and feedback from agency workers. In 2023, we completed our third round of these audits, and 13 labour providers completed this audit.
- **Annual review** – the third annual review of the Human Rights and Ethical Programme was completed in 2023. This enables us to monitor our progress in addressing and reducing risks of modern slavery and make any necessary updates and changes to our programme.



Modern Slavery Action Plan

Using the results from the Modern Slavery Risk Assessment and Stronger Together Good Practice checklist and our Annual Review, we developed our fourth Modern Slavery Action Plan:

Actions	Status
<p>1. Continued Modern slavery awareness training. Run modern slavery awareness training sessions for SEF/TU Representatives, HR and Operations managers and extend to Central Recruitment Team and introduce training targets.</p>	
<p>2. Embed Remedy and Remediation Policies Continued to embed Forced Labour Response Plan policy and Group Remediation policy</p>	
<p>3. Achieve Responsible Recruitment Business Partner Status Self-assess our direct recruitment process against the Responsible Recruitment Toolkit Standards and achieve Business Partner Status.</p>	
<p>4. Onsite Contractors Agree the onsite contractors to be covered by the modern slavery risk assessment process and work with Stronger Together to develop a checklist.</p>	
<p>5. Agency Labour Third Party Audits Complete third annual assessment process of all labour providers by an independent qualified labour provider auditor, aiming for all to be at least compliant</p>	
<p>6. Review Proactive Checks Carry out a review of the Proactive Checks in the Stronger Together Checklist and agree checks to be implemented</p>	
<p>7. Partnership with external charity/NGOs Carry out a review of potential external charities/NGOs that Bakkavor could link with for additional support on tackling issues of hidden exploitation and Modern Slavery</p>	

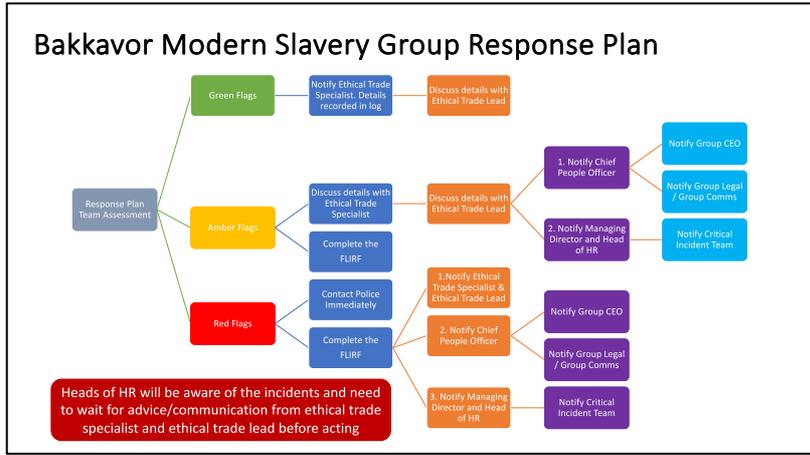
We are pleased to report that five of our actions have been completed in full and progress has been made on the remaining two. We have plans to complete these two in 2024.

Site Action

A key focus for 2023 was embedding our Forced Labour Response Plan Policy. Response plan teams were established on each site in 2022, consisting of a General Manager, HR Business Partner, First Aider and at least one Modern Slavery Champion. Our Modern Slavery Champions are SEF Representatives but also can be new starter champions, occupational health staff or trainers – anyone that connects with workers and can build trust.

Response plan team members are trained on raising awareness of modern slavery and forced labour and how to report and record cases. We use the Stronger Together Modern Slavery Champion resources to give sites further support.

We reviewed our Bakkavor Modern Slavery Group Response Plan in 2023 to ensure that any potential cases of modern slavery or forced labour are raised quickly and dealt with by the right people. This flowchart shows how we manage this process:



In addition, Stronger Together posters are displayed at all Bakkavor sites to raise awareness of modern slavery.

Responsible Recruitment has been embedded into our Ethical Trade and Human Rights Programme. This includes the Working in the UK - Your Rights video which is now part of our ethical training and induction programmes. We also included worker rights in our agency worker induction programme.

In 2023, we developed our first video to raise awareness of modern slavery, the indicators to look for and how to report issues. We plan to launch this in 2024 to increase understanding at site level.

We became a business partner with Bright Futures Co-op to support survivors of modern slavery who face many obstacles when re-entering the workplace by promoting jobs within Bakkavor.

During 2023, we identified a small number of potential cases of modern slavery including:

- **Bourne** – raised a concern about a pregnant agency worker with their local labour provider. She had complained about feeling dizzy and unwell and unable to provide basic information. There were concerns that her behaviour potentially could constitute forced labour under abuse of vulnerability and restriction of movement. The agency worker had the same contact number and address but did have access to her own bank account and wages. The investigation was conducted by the agency labour provider in conjunction with the local police and no concerns were found. The agency committed to continue to monitor the situation.
- **Devizes** – an agency worker was seen to be falling over a lot and not eating at work. There were concerns about their welfare as well as whether or not there was any labour exploitation. The agency labour provider investigated and found there was no evidence of labour exploitation.
- **Highbridge** – the GLAA raised a concern with us about an accommodation complex that they had been investigating. There was no immediate threat, risk, or harm to those living there. We found that 18 agency workers and one direct employee lived in this accommodation. A range of checks were carried out to establish if there were any indicators of modern slavery, including an increase in car park monitoring, issuing out the modern slavery leaflet, briefing managers, checking duplicate bank accounts and address.

The response plan team concluded that this was a green flag and unlikely to be an issue of modern slavery.

Modern Slavery Risk Within our Supply Chain

Bakkavor has a high level of awareness of the risk of Modern Slavery within our supply chain. We recognise our responsibility to inform suppliers of this risk and to work with them to prevent or eliminate all forms of exploitation from their operations and supply chains.

We recognise that modern slavery will not be resolved by any individual business and that greatest impact will be achieved by working pre-competitively with our customers, peers, and suppliers alongside government, enforcement agencies, and civil society. We have a clear focus on creating and supporting the collaborations and institutions to enable this to happen most effectively.

In 2023 we invited UK suppliers who use seasonal workers to join a Grower update and discussion forum run by the Association of Labour Providers and the Seasonal Workers Scheme Taskforce.

Migrant Labour

Migrant labour risk continues to be one of the most complex challenges faced by the food industry. The demands of seasonable production within agriculture and manufacturing means there will always be a need for seasonal labour, however the nature of this workforce can make it vulnerable to exploitation.

Suppliers are expected to assess the risk of migrant labour occurring in their own business and supply chains and implement steps commensurate to the severity and likelihood of the adverse impact.

Bakkavor expects its suppliers to have a clear understanding of the processes, fees and costs associated with migrant labour. This includes fees and costs incurred for migrant worker recruitment at origin, transit (where applicable) from destination countries and any outstanding debts the worker may incur because of the process.

The migrant worker recruitment policy should stipulate clearly what fees and costs shall be borne by workers and the employer respectively as well as the main principles that shall guide the suppliers' recruitment activities and their engagement with registered recruitment agencies, registered sub-agents, 3rd party recruiters or suppliers.

If not already implemented, suppliers should develop a time bound action plan to move to a responsible recruitment model in line with the Employer Pays Principle and the ILO definition on recruitment fees and costs. This should be incorporated alongside adequate controls as part of the recruitment process.

These requirements are clearly documented within Bakkavor Supplier Code of Conduct which is available online. Suppliers are asked to report on compliance and engagement takes place to address non-compliance.

Supply Chain Collaboration

Food Network for Ethical Trade (FNET)

Bakkavor was a founder member of the Food Network for Ethical Trade (FNET), a collaboration set up to promote greater understanding of and an aligned approach to ethical supply chain management within food supply chains. FNET provides expertise, insight, and a safe space where members can work to address shared human rights challenges.

Bakkavor joined the FNET Board in 2022, putting the company in a position to coalesce industry action towards a goal of eliminating modern slavery. The company continues to participate in FNET working groups and chairs the FNET Audit and Risk Committee, ensuring robust organisational governance.

Modern Slavery Intelligence Network (MSIN)

Bakkavor are founding supporters of the Modern Slavery Intelligence Network (MSIN), a non-profit collaboration between supermarkets and large food and fresh produce processors created in response to the findings of Operation Fort, the UK's largest ever Modern Slavery investigation. MSIN have been supported by an independent charity, Stop the Traffic, to provide a secure platform for information and intelligence sharing, expert analysis and guidance on modern slavery prevention and remediation. This enables member to share details of incidents through a secure online platform.

Spanish Ethical Trade Forum

The Spanish Ethical Trade Forum (ETF) was established to create a non-competitive space where Spanish suppliers and their UK based customers can share best practice on human rights and environmental issues and discuss joint challenges and effective ways to resolve these.

ETF membership continues to grow and Bakkavor is an active participant with both Spanish technical colleagues and the UK-based Responsible Sourcing Team engaging in events and activities, online and in-person. In 2023 Bakkavor Spain Technical Manager was nominated to the Board of ETF, reflecting the company's commitment to the organisation.

Ethical Trade Initiative grievance mechanisms in agriculture

Bakkavor is participating in this project that is funded by the UK Government Modern Slavery Innovation Fund to contribute to the UK Modern Slavery Strategy. The purpose is to increase the ability of migrant workers to access appropriate grievance mechanisms within targeted agricultural supply chains in Spain and Italy, and for retailers, suppliers, and producers to improve their approach to preventing modern slavery and enabling decent work. The ETI are working alongside the Spanish ETF to create a single grievance mechanism for Spanish growers to maximise reach and improve the effectiveness of this important tool.

Direct Supplier Engagement

In 2023 Bakkavor updated the Supplier Code of Conduct that outlines the company's expectations of suppliers in relation to human rights. Every supplier was asked to carry out a compliance self-assessment, the findings of which determined Bakkavor engagement priorities for 2024.



Modern Slavery Training and Awareness.

Bakkavor operational capacity building

We continued to deliver our on-line modular training programme in 2023 to reach more colleagues across Bakkavor.

The following sessions took place:

Training session	Numbers of Sessions
Modern Slavery response plan team	3
Modern Slavery and hidden exploitation for SEF and Trade Union reps	3
Modern Slavery and hidden exploitation for HR	2
Modern Slavery and hidden exploitation for Operations	4
Bakkavor Ethical Trade and Human Rights programme for HR	2
Annual Modern Slavery risk assessment process for HR	1
Customers & Human Rights for HR, Commercial, Procurement and Technical	1

Our ethical compliance consultant accesses Stronger Together and other ethical standards resources to ensure we have the most up to date information on tackling the issue of modern slavery and hidden exploitation which are built into our training sessions.

Stronger Together’s ‘Tackling modern slavery in UK businesses’ training.

It is our policy to have at least one HR colleague per site attend this external training course every three years as a minimum, and preferably two to account for jobs moves and leavers. In 2023, 14 HR colleagues attended this training and there is a plan to train up to a further 19 HR colleagues in 2024.

Effectiveness assessment

To assess the impact of the steps we have taken, key performance indicators are reviewed and reported on in our Modern Slavery statements. These KPIs support the focus on building capacity and awareness across Bakkavor.

Key Performance Indicator	2017	2018	2019	2020	2021	2022	2023
Stronger Together progress monitoring tool		48.6%	55%	65%	77%	77%	79%
Stronger Together Organisational Performance Assessment		43%			77%	77%	77%
% of Bakkavor sites with HR that have completed the Stronger Together training	89%	100%	100%	89%	100%	100%	74%. ¹
% of Bakkavor sites completed the Modern Slavery risk assessment	100%	100%	100%	100%	100%	100%	100%

¹ In 2023, we re-set the numbers that have attended this training to include only those that have been trained in the last three years.



Key Performance Indicator	2017	2018	2019	2020	2021	2022	2023
% of Bakkavor sites completed the Stronger Together Tackling Modern Slavery in Business implementation checklist	89%	100%	100%	100%	100%	100%	100%
Number of Bakkavor capacity building days	550	469	521	225	2205	715	607
% of Bakkavor sites that have completed an agency audit every 12 ¹ months	100%	100%	100%	100%	100%	100%	100%
Number of cases received by the whistleblowing hotline	105	67	69	51	42	21	41
% of 2023 whistleblowing cases closed out	100%	100%	100%	100%	100%	90%	92% ²
Implementation of Stronger Together Good Practice Checklist				54%	65%	72%	77%
Modern Slavery risk rating					62%	63%	66%

Progress against Stronger Together’s ‘Tackling Modern Slavery – Good Practice Implementation Checklist’

Using this checklist and we are able to monitor our year-on-year progress and to measure our activities against the UN Guiding Principles Framework:

Steps	2020	2021	2022	2023
1. COMMIT to tackle modern slavery risk in your business	65%	85%	86%	87%
2. ASSESS - Understand the risks of modern slavery and hidden exploitation within your business	75%	82%	92%	93%
3. ACT - Take action to prevent and deal with identified risks	49%	52%	58%	67%
4. REMEDY - Protect and provide remedy for victims of exploitation	34%	64%	94%	94%
5. MONITOR - Monitor and review progress	66%	81%	80%	80%
6. COMMUNICATE - Tell people what you've done	71%	88%	88%	88%
OVERALL SCORE	54%	65%	72%	77%

We were pleased to see our overall score increased again to 77%. We have action plans in place to drive further improvements in our scores in 2024.



We have retained our Stronger Together Business Partner ‘Advanced’ status for 2023.



We achieved Responsible Recruitment Business Partner Status in 2023.

This statement was approved by the Board of Bakkavor Group plc on 27 June 2024.

¹ Change to every 12 months in 2022 with the new Labour Provider Audit Process

² Three cases were still outstanding at the end of 2023 but are now closed out.