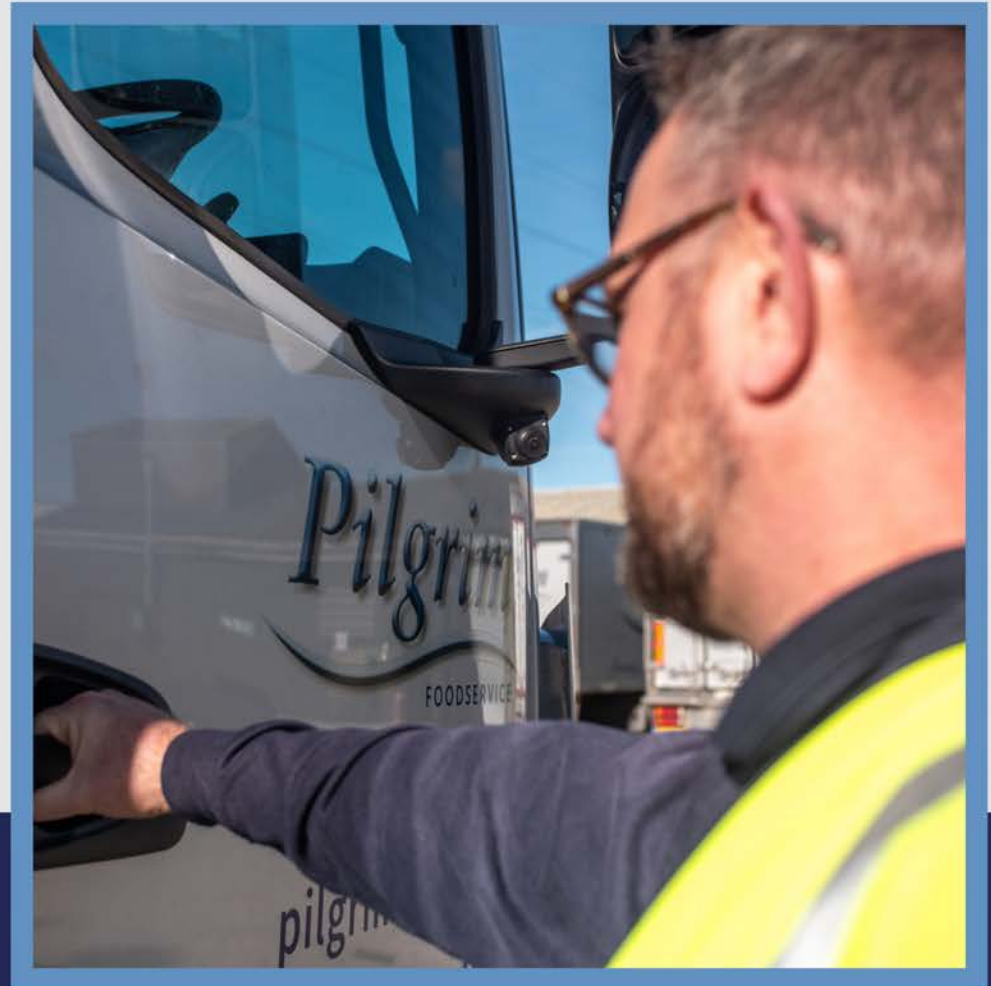


MODERN SLAVERY STATEMENT

September 2024





INTRODUCTION

Modern slavery is a rapidly growing global concern, with many people living under conditions of forced labour, slavery, servitude, and human trafficking. It affects all business sectors and regions globally.

Pilgrim Foodservice Ltd is committed to taking all possible measures to eliminate modern slavery within our business and supply chain. Our staff are encouraged to report any concerns through safe and confidential channels so that senior management can take appropriate action.

This is Pilgrim Foodservice's fifth modern slavery statement, published in adherence to the Modern Slavery Act 2015. The purpose of this statement is to demonstrate the steps taken by Pilgrim Foodservice Ltd to prevent modern slavery and human trafficking within our business and supply chain for the financial year ended April 2024.

The statement references the Ethical Trading Initiative's modern slavery statement evaluation framework. (1)

STRUCTURE, BUSINESS AND SUPPLY CHAIN

Pilgrim Foodservice Ltd is a family-run business supplying foodservice outlets, such as bars, restaurants, the care sector, and leading foodservice suppliers. We manufacture fresh prepared vegetables and butchery products, and we also supply a wide range of chilled, frozen, ambient, cleaning, and disposable goods. We are members of a larger group called Caterforce.

Modern slavery is a shared responsibility across the business, with HR and the Managing Director overseeing internal practices, while Procurement, Buying, and Technical departments focus on the supply chain.

We recognise how our behaviour impacts our people, the environment, and the success of our business, which has led to the creation of our four core values:

- Innovation
- Respect
- Integrity
- Trust

These values guide our approach in all areas of the business, including the eradication of modern slavery from our supply chains and our site.

Pilgrim Foodservice operates from a single site in Boston, Lincolnshire, serving neighbouring counties and London. Since 2024, with the opening of a new cross-dock facility, our operations have extended into Essex.

We employ over 300 permanent full- and part-time team members, including office workers, warehouse staff, production operatives, and drivers. During peak times, such as around Christmas, we work with a local labour agency to boost the workforce. All labour agencies we use are registered with the Gangmasters Labour Abuse Authority (GLAA).

We also work with third-party service providers and contractors for site maintenance, including manual handling equipment, delivery vehicles, high-level cleaning, and building repairs. These providers are known to the company and are approved from a safe systems of work perspective.

Pilgrim Foodservice uses a wide range of suppliers, from local farmers to global companies, and we assess their practices on modern slavery via our Ethical Trading Questionnaire. We are committed to continually assessing our suppliers and service providers to ensure no instances of modern slavery occur within our supply chains.



POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Pilgrim Foodservice Ltd operates under strict HR and Sourcing Policies, which are based on the Modern Slavery Act and use resources from the Stronger2gether website: www.stronger2gether.org.

We are committed to ensuring that all team members, new or existing, are not subject to threats that may amount to modern slavery or forced labour. Our internal recruitment team advertises roles internally and externally, and we only use reputable external labour agencies. We are fully committed to the following:

- Fair and consistent advertising, criteria for shortlisting, and practices for selection
- Verifying that new team members have the right to work in the UK (e.g., passport, UK birth or adoption certificate, work permit, share code, etc.)
- Asking new team members if they have their own bank account for payment
- Ensuring young, inexperienced, or other new team members are treated equally and fairly
- Not employing anyone considered to be 'child labour'
- Providing new team members with a full induction, including health and safety training
- Offering holiday entitlement above statutory requirements
- Providing fair pay, never below the national minimum wage
- Offering benefits, break/rest time, and statutory sick pay if eligible
- Providing a grievance procedure for team members who believe they are being treated unfairly
- Ensuring fair and safe working conditions
- Strictly prohibiting forced labour
- Managing team member exits in a fair and consistent manner, including a documented exit interview

All team members have access to the Company Handbook, which is stored electronically within the Quality Management System (QMS). Training is provided to all team members on using the QMS, and policies are enforced through audits and daily communications. Those without system access receive policies via email.

Other relevant policies include:

- Control of Contractors (safe working methods, health & safety)
- HR Operating Procedure (job profiles, staff facilities, personal data, recruitment, inductions, exits, training, absence, grievance procedures, etc.)
- Product, Supplier Management & Procurement (supply chain management)
- Health & Safety Operating Procedure
- Employee Medical Questionnaire (captures existing medical conditions)
- Equal Opportunity Monitoring Form
- Working Time Directive Opt-Out Agreement (allows team members to limit their working hours)
- GDPR Policy (how employee personal data is treated)
- Whistleblowing Policy (enables anonymous reporting of misconduct)



Our HR team looks for signs of modern slavery, such as:

- Lack of control over personal documents (passport, birth certificates, etc.)
- Behaviour indicating coaching or control by others
- Allowing others to speak on their behalf
- Being dropped off and collected from work
- Appearing withdrawn or frightened
- Limited contact with friends or family
- Restricted social interaction

This list is not exhaustive.

Our payroll process is outsourced to a reputable provider that adheres to the Modern Slavery Act 2015.

To maintain awareness and understanding of the risks of modern slavery, our policy is available to all team members.





DUE DILIGENCE PROCESSES

We periodically audit our recruitment and induction processes to ensure we are not enabling modern slavery. We expect all labour agencies to be fully compliant with the Modern Slavery Act 2015. Any agency found to fall short of these standards will be removed from our preferred supplier list, and we may involve the police or GLAA if necessary.

We assess suppliers for risk, and if modern slavery is identified, we will work with the first-tier supplier to create a plan for eradication. If they fail to address the issue, we will report them to the authorities and remove them from our supplier list.

Team members affected by modern slavery may speak to any manager or the People department. They can also report concerns through the company's whistleblowing system.



TRAINING AND CAPACITY BUILDING

Our People and recruitment team have been trained to recognise and respond to signs of modern slavery. Department managers are also familiar with the reporting process.

Awareness is raised among all new employees through the Modern Slavery Policy, which is part of the induction pack.

NEXT STEPS AND OUR COMMITMENT

The next steps for Pilgrim Foodservice include:

- Continued supply chain monitoring of suppliers and service providers
- Ongoing supplier reviews, including the ethical trading questionnaire
- Staff awareness campaigns
- Developing stronger supplier relationships
- Auditing or traceability exercises on higher-risk suppliers
- Ongoing risk assessments

We commit to working with experts internally and externally to audit our policies and identify any risks. The results of these audits will shape our policies at the senior level, ensuring that every member of our business understands these policies and adheres to the expected behaviours.

This statement has been approved and signed by:

Charles J Bateman | Managing Director

Pilgrim Foodservice Ltd

September 2024





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(1) Ethical Trading Initiative Modern Slavery Statements; A Framework for Evaluation

www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Framework%20MSS%20Evaluation_v8_for%20publication.pdf