

Modern Slavery Statement 2024-2025

This statement sets out the steps that Suma Wholefoods has taken to ensure that modern slavery or human trafficking does not take place within our business or supply chain during the period from October 2024 to September 2025. This year has seen some good progress with Suma's revised Buying Policy now in operation having been updated in 2024. Work is currently ongoing examining our approach to boycotts which encompasses regimes using unfree labour and this will continue through 2025-2026.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Forced or unfree labour is when a person is forced into undertaking work for little or no money. 28 million people are in forced labour worldwide and more than 122,000 people are in modern slavery in the UK – although the figures are most likely much higher ([Unseen](#), 2025). Suma has a zero-tolerance approach to any form of modern slavery. We are committed to acting with integrity and transparency in all business dealings and maintaining effective systems and controls to safeguard against modern slavery and other human rights violations within our business and supply chain.

- **Organisation:** Structure, governance and supply chains

Suma is a fully democratic worker co-operative comprising of a blended workforce; members, trial members (TMs) and fixed term workers. All co-operative members and employees receive the same gross hourly rate of pay, no matter what their job or responsibilities. We also often deal with external organisations and contractors for

various services both onsite and offsite. We have had a Bakers, Food and Allied Workers Union branch for over 30 years.

We operate from three linked sites – our base, in Elland, West Yorkshire, a hub in London and a hub in Bristol. All workers are based in the UK at one or more of these sites. Suma is the UK's largest independent wholefood wholesaler/distributor, specialising in vegetarian, fairly traded, organic, ethical and natural products from all around the world. This means that our supply chains are complex and require a lot of attention.

Suma brand products

Suma has three brands, 'Suma' for our food range including our organic products, 'Ecoleaf' by Suma' which is our household cleaning products, and 'Alter/native by Suma' which is our body care range.

The logo for Ecoleaf by Suma. The word "ecoleaf" is written in a lowercase, teal-colored, sans-serif font. To the right of "ecoleaf", the words "BY SUMA" are written in a smaller, teal-colored, uppercase, sans-serif font, oriented vertically.The Suma logo. The word "Suma" is written in a large, bold, black, serif font. Below it, the words "CO-OPERATIVE SINCE 1977" are written in a smaller, black, uppercase, sans-serif font.The Alter/native by Suma logo. The words "ALTER/NATIVE" are written in a bold, black, uppercase, sans-serif font. To the right of "ALTER/NATIVE", the words "BY SUMA" are written in a smaller, black, uppercase, sans-serif font, oriented vertically.

- **Policies:** Relevant policies on slavery and human trafficking.

Our Vision, Mission and Sustainability Strategy all guide Suma towards a fair and transparent supply chain.

We continue to be guided by our internal Modern Slavery policy which was implemented and signed off by the Board in July 2022. Our reviewed Buying Policy, in operation this year has proved to be more holistic and comprehensive – providing clarity for Suma workers, especially our Buyers. This emphasises what we expect from our suppliers and defines what sets us apart from our competitors.

- **Due Diligence & Risk Management:** Processes for assessing and managing risks.

To compliment this work, our SEQ has also been updated to ensure that it aligns with the Buying Policy, serving more as a preventative control to mitigate the risk of onboarding a supplier who does not align with our values. The SEQ acts as our main method of assessing and managing our risk in this area. Of course, there is still largely an element of trust between Suma and our Suppliers as we accept that what is shared with us is accurate.

Sedex membership

We have renewed our membership to Sedex which allows us to have support to gain better insight of our supply chains, assess our risks, report any negative impacts and comply with legislation. We try to advise some of our relevant suppliers to have a

membership or at least sign up to similar accreditation schemes that serve a similar function.

- **Training:** Details on staff and supplier training.

We continue to operate a number of related policies to ensure that we are conducting business in an ethical and transparent manner. These include our:

1. Recruitment policy. We operate a recruitment policy, 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.
2. Whistleblowing. All new starters are issued with an induction pack stating that 'whistleblowing' (as defined by the Public Interest (Disclosure) Act 1998) will not be deemed a 'serious breach of Confidence' under the terms of our Disciplinary and Dismissal procedures.

We continue to align ourselves to the Ethical Trading Initiative Base Code which consists of the following criteria:

1. Employment is freely chosen.
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour shall not be used.
5. Living wages are paid.
6. Working hours are not excessive.
7. No discrimination is practised.

8. Regular employment is provided.
9. No harsh or inhumane treatment is allowed.
10. Our new supplier approval process is built around ensuring that suppliers are fully compliant with this code.

Modern Slavery training will continue to be mandatory to employees who fulfil specific roles and functions within the business.

- **Performance:** Setting goals and reporting on effectiveness.

Completed 2024-2025

- New Buying Policy in operation.
- Revised SEQ now being used.

Our Ethical Supply Chain Working Group meets every two months to actively monitor progress and examine ideas for improvements. We are currently looking at our Boycotts policy and how this fits in with our Buying Policy and our aim is to complete this work during 2025-2026.

References

<https://www.unseenuk.org/about-modern-slavery/facts-and-figures/>