

1. Our structure, business, and supply chains

Fullers Foods International headquarters is based in Leeds in the UK and has approximately 80 employees. We are an office-based company made up of several departments including development, technical, commercial, accounts, and supply chain. We have increased resource during the last reporting period and enhanced our senior leadership team and structure, further defining responsibilities for our business operations. We consider the modern slavery risk of the office to be low.

Fullers Foods International is one of the largest suppliers of frozen foods to the UK market, specialising in the development and procurement of retail ready to cook and ready to eat products across frozen, chilled and ambient categories. Supplying more than 1,200 products including potatoes, vegetables, fruit, poultry, prawns, breads, morning goods, cookies, ice, ice cream, smoothies, ready meals, party food, meat free, organic, free from and vegan products.

We work with over 100 tier 1 supplier partners which are located in the UK, ROI, Eastern and Western Europe, South America, Africa and Asia. Finished packaged goods are supplied by our partners and distributed through assigned cold store and distribution networks. The majority is sold to the end user through high street retailers in the UK and Eire, although we do supply into the food service industry, a small volume of products business to business, plus Fullers brand and tertiary branded lines into the retail and food service sectors.

We acknowledge that brand integrity of our customers products is a primary requirement which includes our responsibility and commitment to Environmental, Social and Governance matters. With that in mind, we have developed and published our annual Modern Slavery Statement with due consideration to section 54 of the Modern Slavery Act 2015. We clarify how slavery and human trafficking can affect our business, and the steps we are taking to control and tackle it. This publication is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of Fullers Foods International. Our efforts against slavery and human trafficking complement our broader ethical policies based on the ETI Base Code and ILO standards.

Routine social compliance within the supply chain risk is managed by the ESG team. In order to highlight the positive impact of ESG projects alongside agronomy, quality and safety, an Agricultural Technical Manager was appointed in December 2023. Intelligence is shared from a climate perspective and working closely with the ESG team align any challenges and risks to be shared with customers. Our strategy and any decisions are jointly made by the ESG Manager, Technical Director and signed off by the CEO. A multi-disciplinary ESG steering group was formed in March 2024 to embed strategic priorities.

2. Policies and contractual controls

Our employees

Fullers Foods International are committed to human rights and as such have policies in line to protect colleagues. We require all staff working at the head office to follow the staff handbook regarding our whistleblowing procedure. New colleagues are trained on modern slavery awareness during induction and key colleagues who are most in contact with our supplier partners are required to complete modern slavery awareness training. In June 2023 we completed our first company ESG assessment using EcoVadis, the outcome of which provided us with clear actions to take on human rights policies and procedures. Work has started on building a business management system covering human rights, environmental and health and safety. Currently all policies and handbooks are accessible in hard copy format and electronically on the company intranet. All employees are made aware of the relevant policies during their induction and any updates are formally issued internally through face-to-face training.

Supplier partners

We expect all our supplier partners to comply with the Ethical and Labour Standards policy and to take responsibility for human rights, not only within their factories, but within their extended supply chains. Our policy covers areas such as worker engagement, grievances, whistleblowing, audit requirements and human rights commitments, including in-scope UK sites to publish a modern slavery statement. These are the minimum requirements set out by Fullers Foods. This is distributed electronically at the time of business confirmation and acceptance is recorded with each new version. We rely on sites to maintain open and

transparent communication regarding audit bookings, completion, non-compliances and learnings. The most severe issues identified during an ethical audit are required to be highlighted within 48 hours and business will be placed on hold until effective corrective actions are implemented. We have formalised ESG minimum standards within the on-boarding process for new supplying sites meaning contractual relationships will not be issued if all standards are not met or agreed to.

3. Assessment of modern slavery risk within our supply chain

We are a BRCGS Agents and Brokers accredited supplier and are AB members of the Supplier Ethical Data Exchange (SEDEX). We use RADAR to understand modern slavery risk, as well as broader human rights risks at supplying site level. We are a member of the FNET (Food Network for Ethical Trade) and as such we are committed to engaging with this group to understand human rights indicators, identify common challenges, industry concerns and create solutions. We continue to participate in regular retailer conferences and disseminate outcomes, resources and objectives to our supply base.

Our overall ethical risk assessment uses the following data set to generate an outcome for each supplier partner based on the following:

- Sedex SAQ score
- Sedex RADAR
- location of factory (country)
- production volume to Fullers
- commercial value to Fullers
- product type
- social compliance history
- engagement with Fullers Foods

Fullers risk ratings are low (green), medium (amber) or high (red) enabling easy identification, reporting and consistency in terminology with retail customers. Based on this information as well as the knowledge from internal teams, we have identified seasonal supply chains in Asia, in particular Vietnam, Thailand and China as being high risk. In addition, all year-round supply chains in Europe and the UK as being at an increasing risk during this reporting period (due to labour standards and health and safety risks). The outcomes and grading of audits are communicated to sites alongside their risk rating. Our highest risk supplier sites make up <10% of our total supply base currently. We have had no reported cases of forced labour or child labour raised about our own operations in the reporting year. We continue to develop our risk assessment process and review the needs of the business and customer requirements across all sectors. Outside of retail branded products we have identified a need to face into other areas of the business in terms of risk assessing branded products and food service or hospitality operations.

It is important to us to collaborate with various stakeholders and be informed through multiple data sets. Stronger Together celebrated their 10 year anniversary and we attended the conference in May that aimed to share experiences on responsible recruitment, effective prevention, remedy and due diligence. We attended a Modern Slavery Intelligence Network (MSIN) conference in September which highlighted the role of legislation, trends identified in slavery and how we can engage further and quicker to disrupt labour exploitation in the industry. Two FNET working group meetings took place last year, working with other suppliers and retailers to allow transparency and generate shared solutions.

4. Due diligence procedures

Audit and SEDEX

We understand that our biggest exposure to modern slavery is in our product supply chains and in the first instance we use SEDEX for compliance with our policy for tier 1 sites. In addition to meeting the Ethical and Labour Standards policy, if the sites are producing for retail own label they must be linked to customers on SEDEX, complete the SAQ in full every 6 months or after a significant change and show visibility of audit history. 54% of those suppliers have had a routine SMETA audit in the last two years and we have an 86% compliance rate regarding SAQ management.

We ask supplying sites for open and honest communication; following an audit the corrective action procedure for non-compliances must be committed to and we provide support to enable this. An end of year review across audit outcomes provided insights on non-compliance type and categories for increased awareness within the business. Any learnings are used to support upcoming audits with supplying sites. SEDEX RADAR and analytics are both tools we use routinely for due diligence. Through site visits we are establishing response plans and mechanisms in place in the event that a breach of human rights is suspected or identified and we are monitoring emerging trends in labour provision, worker displacement and movements via FNET, Stronger Together and Food Forensics. To enhance due diligence we are recording detailed data for high risk supplying sites as part of our commitment to customers; this is enabled by Technical and Compliance Managers in support of the ESG team.

Remediation and grievance mechanisms

We recognise the importance of locally developed grievance procedures and procedures for remedying human rights issues which are raised by workers or external third parties about supply chains. Grievance procedures should follow the United Nations Guiding Principles “[effectiveness criteria](#)” for non-judicial grievance mechanisms. Our colleague handbook outlines the mechanisms in place for grievances and whistleblowing, with details available at all times on the health and safety noticeboard for colleagues and visitors. All supplier partners are required to have a whistleblowing policy and grievance procedure in place with supporting resources and information visibly displayed.

Toolkits and resources

We use the Responsible Recruitment Toolkit and the Stronger Together Good Practice Implementation Checklist to assess our status and monitor progress annually. The Authenticate ESG assessment provides a broader insight into progression on a shared portal which retail customers can access. EcoVadis has identified priority actions across labour and human rights indicators and is to be completed annually moving forwards.

5. Effectiveness / Key Performance Indicators

Key Performance Indicator	Y 2020/2021	Y 2021 / 2022	Y 2022 / 2023	Y 2023 / 2024
Development and implementation of policy	100%	100%	100%	100%
Colleagues who have completed ST training on modern slavery	0	5x technical / 6x commercial / 6x NPD	1x SLT / 3x technical / 1x compliance / 1x NPD	2x SLT / 2x technical / 2x ESG / 1x commercial / 1x NPD
Number of supplier partners registered on SEDEX	100%	100%	100%	100%
Number of supplier partners with compliant SAQs	96%	83%	71%	86%
Number of supplier partners that have accepted and are abiding to the Fullers Ethical and Labour Standards Policy	100%	73%	53%	58%
Number of non-compliances raised in ethical audits identifying modern slavery issues	0	0	0	0
Number of modern slavery incidents reported in the supply chain through non-audit channels	0	0	0	0
Number of UK supplier partners (meeting legal requirement) have published a modern slavery statement	not recorded	80%	80%	100%

Number of times a grievance mechanism was used	not recorded	0	0	0
Number of times a whistleblowing mechanism was used	not recorded	0	0	0

6. Training

Training is fundamental for colleagues and as part of our strategy, promoting cultural change. This reporting period we have completed the following:

- [Stronger Together Introduction to Tackling Modern Slavery in UK Businesses](#) in May
- Culture training which covers identifying responsible behaviours and creating a positive culture where business practices do not increase the risks of modern slavery. Completed by the Technical team in September
- Ethical Trade Initiative Human Essentials training for the ESG team in May and June

We have identified champions within the business that are responsible for raising awareness and mitigating risks of modern slavery, are a point of contact for any queries and will be part of our response plan. Our supply chain partners must complete with any retailer specific training requirements, and also we recommend a nominated colleague at the site undertakes the SEDEX e-learning modules. We share links to any learning, training or resources with supplier partners across a number of topics such as labour provider due diligence, recruitment good practices, retailer forums and regional conferences.

Signed



CEO Kevin Smith 18.04.24