



Modern Slavery and Human Trafficking Statement for the financial year ending 25 June 2022

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes anti-slavery and human trafficking statement for the financial year ending 30 June 2020 for Bright Blue Foods Limited and any subsidiary and/or holding company of Bright Blue Foods Limited as defined in section 1159 of the Companies Act 2006 (**Group Company**). Any reference to “BBF”, “BBF’s”, “the Company”, “Company”, “we”, “us” or “our” is a reference to Bright Blue Foods Limited and/or a Group Company. The statement sets out the steps taken, and those which BBF intends to take in the future to prevent modern slavery and human trafficking in our supply chains or in any part of our business.

About BBF

BBF is one of the UK’s leading ambient cake and chilled dessert manufacturers of retailer own label, licensed and branded cakes, supplying recognisable retailers across the UK and European market. BBF has five bakeries based in the UK and Poland, employing over 1500 people.

Our commitment

BBF is committed to preventing modern slavery and human trafficking in its corporate activities and to working collaboratively with its supply chains to eradicate modern slavery and human trafficking. The statement outlines BBF’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

BBF’s directors are responsible for ensuring effective modern slavery risk assessments are undertaken, due diligence processes are in place and effective induction/refresher training is rolled out across the organisation to ensure employees understand and can respond to the identified slavery and human trafficking risks. Our Modern Slavery and Human Trafficking Policy outlines details in this regard.

Our supply chain

Since BBF sources over 500 ingredients from around the world, our suppliers work with thousands of their own suppliers across the world. Environmental and Ethical Sourcing is one of the key pillars of our approach and we strive to source all our ingredients, goods and services in an ethical and responsible way. To meet our modern slavery commitment, our first-tier suppliers are required to be members of Sedex, (the Supplier Ethical Trading Data Exchange) one of the world leading, not for profit, ethical trade membership organisations serving to help businesses operate responsibly and sustainably, protect workers and source ethically. Our overall supply chain beyond the first tier extends globally and is multi-layered and therefore we continue to look at ways of assessing the entire supply chain in collaboration with our first-tier suppliers and managing modern slavery risk within it.

Our employees

Necessary use of seasonal, temporary workers across the BBF bakeries poses a high-risk area from a modern slavery perspective. We accordingly have a well-established and robust audit process in place to manage this risk. Our process is continually reviewed and updated in accordance with guidance from Stronger Together and the Gangmasters and Labour Abuse Authority.

Training

To be effective in preventing and tackling modern slavery and human trafficking, we need to continue to raise awareness of this important issue, giving employees the necessary tools to identify suspected



cases and to know what to do if they encounter a situation that causes concern. Compulsory training on modern slavery and human trafficking is a key part of our approach. All employees must attend an induction when joining the business, which includes a modern slavery section and mandatory training must be completed by all employees as part of our training package. All Senior Managers and procurement team members have undertaken training workshops with Stronger Together on tackling modern slavery in the UK.

HR teams at BBF are provided with extensive knowledge and resources required to conduct in depth checks on 'Right to Work' compliance. HR managers also maintain the management of the SEDEX system.

Policies in relation to Slavery and Human Trafficking

We are committed to achieving the objectives and requirements of the Modern Slavery Act and aim to ensure that there is no place in our operations and supply chain for modern slavery by having robust policies and procedures.

We have a structured HR function and an array of policies, procedures and systems that are devised to ensure we are conducting our business in an ethical, responsible and transparent manner. All new employees and agency workers are required to prove that they have a right to work in the UK, to safeguard against human trafficking or individuals being forced to work against their will. All employees are paid directly into their elected bank account.

We have a Whistleblowing Policy; this policy applies to all employees and agency workers at BBF. It sets out how to raise concerns about how employees are being treated, or practices within our supply chain, without fear of reprisal.

BBF adopts a culture of openness and transparency and in conjunction with the Whistleblowing Policy, we operate a whistleblowing helpline through Navex Global, which is designed to allow employees to confidentially raise any concerns (of unethical conduct or behaviour), 24 hours a day, 365 days a year via telephone, or via an online portal. This therefore gives employees a method of reporting suspected incidents of slavery in a confidential manner. Any complaints or reports will be investigated.

We are satisfied that our existing policies and procedure continue to comply with legal requirements including in relation to modern slavery and human trafficking.

The statement has been approved by BBF's Board of Directors who will review and update it on an annual basis.

Jonathan Lill
CEO

01 December 2023