

Document Title: MODERN SLAVERY STATEMENT 2022

FDL is strongly opposed to slavery, child labour and human trafficking. We strive to act ethically and with integrity in all our business dealings and relationships to ensure that slavery, child labour and human trafficking is not taking place within our organisation or our supply chains.

This statement provides some background to our organisation and our supply chains. It also sets out the steps that we have taken during the financial year ended 31 December 2022 to ensure that slavery and human trafficking are not taking place, either in our organisation or in our supply chains.

Our Organisation

FDL is a body corporate registered in England and Wales, with the head office in London, its manufacturing sites are at Little Walden Airfield – Saffron Walden, Newstead Industrial Estate - Stoke, Brickyard (Phoenix City, Alabama, USA), Gurgaon, Delhi, India and has offices based in Shanghai, China, employing 250 staff globally. Its primary function is supplying products and services to the food and beverage industry.

This statement covers: FDL LTD, Fuerst Day Lawson Group LTD and Fuerst Day Lawson (USA) LTD.

FDL exists to supply innovative products and services within the food sector. Our diverse portfolio and vast experience gives us the edge in this ever growing and changing industry to stay ahead of competition and deliver on-trend products.

Our activities are overseen by our Board of Directors who work collaboratively with staff to ensure effective management of the company. FDL's day-to-day management resides with the Executive Leadership Team which reports directly to the Board of Directors.

Our Policies and Procedures

We operate a number of policies and procedures which reflect our commitment to acting properly in all of our business relationships and to implementing and enforcing effective systems and controls. They apply throughout the organisation including all employees whether permanent or temporary and any contractors working on projects from time to time.

Our key policies and procedures which contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chain include our:

- **Bullying and harassment policy** – which ensures that all of our staff and contractors are treated with both dignity and respect.

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- **Fraud and corruption policy** – which reminds our employees to take account of any improper or suspicious behaviour or situations, and to report and deal with the risk of fraud and corruption.
- **Health, safety and environment policy** – a key aim of which is to ensure the safety of all our employees and anyone else who may be affected by our activities.
- **HR procedures** – which ensures equal and fair treatment of employees. We have procedures in place to safeguard against child labour within the organisation and our supply chain.
- **Procurement policy** – which ties in with the company Quality Assurance policies setting out a clear criterion for selecting suppliers. This in turn involves considerations of supplier reputation and compliance with laws and ethical procedures.
- **Risk management policy** – which ensures our activities are in line with all applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking).
- **Agreements policy** – our template agreements and standard terms and conditions require suppliers to comply with the law (including in relation to modern slavery and human trafficking).
- **Whistleblowing policy** – providing guidance on how to report suspected dangers or wrongdoing in the workplace.

Our policies are monitored by the relevant Division Head and reviewed at least every three years. We will continue to review our policies to ensure that they are effective and relevant.

In particular, our procurement team together with QA continues to review and strengthen our centralised procurement processes and policy, taking into account a range of risks, including slavery and human trafficking.

Our Supply Chain

Our supply chain is the back bone of the business comprising of 100s of companies across globe which supply the organisation with raw materials. Other key areas in which we engage suppliers/service providers are:

- Information technology
- Quality Assurance
- Legal
- Building and construction
- Health and Safety

Our Supply chain due diligence

Given FDL's zero-tolerance policy to slavery, human trafficking and Child Labour, we take active steps to ensure our organisation, business activities and supply chain remain ethical, including:

1. We, ensure fair and equal wage to all employees, and conform to the national wage legislation in the countries in which it operates.

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2. We, have strict protocols on who we contract business with and not trade or do business with any company who does not have similar attitudes to ethical management.
3. When using temporary employees in our UK sites, these are sourced only from recruitment agencies who hold current certification under the Gangmasters Licensing Act 2014, and will encourage suppliers to follow similar practice.
4. Where temporary staff are employed in FDL non European sites, recruitment conforms to local employment legislation.
5. FDL does not require deposits, hold passports or similar documents or otherwise restrict the lawful free movement of its staff, whether permanent or temporary employees.
6. FDL is a member of Sedex, and encourages suppliers to be similarly registered.
7. FDL include ethical considerations both in self assessment questionnaires used at the start of trading and every three years thereafter and in physical site audits undertaken by our staff or nominated agents.
8. FDL have an ethical management system identifying all aspects of fair employment including zero tolerance to discrimination in any form (such as on grounds of gender, race, religion or sexual orientation)

We have analysed our supply chain, assessing the key suppliers in more detail to ensure that they have appropriate policies in place to minimise the risk of slavery, child labour and human trafficking in their business.

Based on our review, we are satisfied that our key suppliers have appropriate policies in place.

Our Quality Assurance team carry out regular due diligence checks on all material suppliers and routinely monitor their compliance with applicable law (including in relation to slavery, child labour and human trafficking). All suppliers are assessed based on ethical audits and accreditation by a reputable ethical body such as SEDEX, is mandatory to approval.

Our procurement team is also looking to foster long-term relationships with suppliers, through which policies aimed at minimising a range of risks (including the risk of slavery, child labour and human trafficking) can be advanced.

Training

Adequate information and training is provided to all our employees, contractors or visitors. Here are some examples of the information and training we provide:

- all new joiners receive induction and are introduced to all functions of the business,
- managers work closely with our HR and legal team in HR and employment related matters including recruitment, remuneration and employee wellbeing,

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- our procurement team works closely with our Quality Assurance team to continuously monitor supplier performance and conformance to necessary national laws and international conventions.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes FDL's Modern Slavery Statement for the financial year 1 January 2022 to 31 December 2022.

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