

# MODERN SLAVERY STATEMENT

2023/2024

30 June, 2024

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# INTRODUCTION

Modern slavery is a global issue that affects millions of the most vulnerable people in society. LDH (La Doria) Ltd is committed to ensuring that the human rights of all workers in our supply chains are respected. This includes playing our part in eradicating modern slavery.

This is the eighth LDH Modern Slavery statement prepared in accordance with the Modern Slavery Act 2015. This statement refers to the financial year ending 31 December 2023 and outlines the steps LDH took to prevent, identify, and remediate modern slavery within our business and supply chains.

This statement was created to meet section 54(1) of the UK Modern Slavery Act 2015 for the financial year ending 31 December 2023 and was approved by LDH's management body on 30/06/2024.

## Key Progress 2023

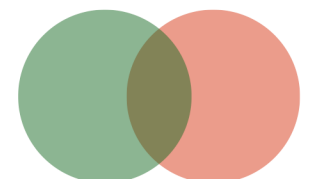
- Identified salient high-risk supply chains to conduct further supply chain transparency and mapping.
- Responsible Sourcing Manager attended further training in:
  - Responsible recruitment
  - Eliminating worker-paid recruitment fees
  - Labour supply chain due diligence
  - Tracking modern slavery in global supply chains
  - Tackling labour exploitation in UK warehousing
- Data collection on gender across Tier 1 suppliers.
- Continuation of Tier 1 risk assessments & action plans.

# MESSAGE FROM OUR CEO

In 2023 we focused on further enhancing our human rights strategy efforts to increase the visibility of our supply chains, conduct horizon scanning and identify salient modern slavery risks across our value chain. Data gathering, collaborative action plans and remediation remain core to our strategy. Last year we identified potential migrant labour risks within our key tomato partnerships, as a result, we co-created a Worker Voice Project with a key customer, NGO, Tier 1 supplier and multiple growers to conduct a confidential survey across 84 workers.

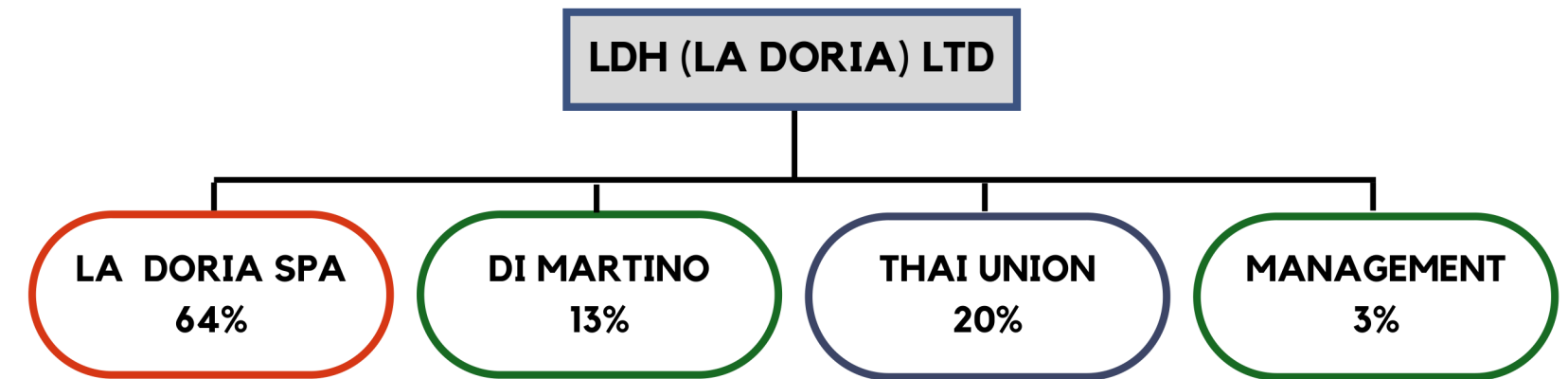
Our responsible sourcing manager has attended further human rights training to proficiently identify and mitigate risks. As we continue, we will remain focused on expanding our knowledge and action plans into 2024 within our own business and across our global stakeholders.

Enzo Lamberti  
CHIEF EXECUTIVE OFFICER



# OUR OPERATIONS

LDH is an importer and distributor of ambient grocery food products with our head office and distribution centre based in the UK. We have a direct relationship with Tier 1 suppliers from global supply chains where the product is packed seasonally and throughout the year for the UK retail, food service and manufacturing sectors. The company ownership encompasses a small number of shareholders; Gruppo La Doria S.p.A, Pastificio Di Martino Gaetano & Fili S.p.A, Thai Union Group PCL and LDH company Directors. LDH has procedures to support the verification and monitoring of its suppliers to ensure that suppliers meet LDH and customers' standards and policies.

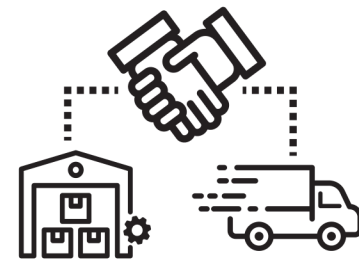


## Governance

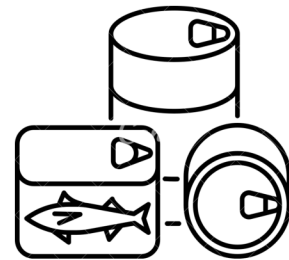
The Responsible Sourcing Manager drives the development and implementation of all activities related to responsible sourcing and human rights, including modern slavery and human trafficking in our supply chains. The Technical Director, who sits on the Board of Directors, has oversight and close involvement with the responsible sourcing programme and informs all company directors of progress and issues every quarter. There is close contact regularly with the Procurement team and internal escalation mechanisms at the Director and CEO level which have been effectively applied in the last year.



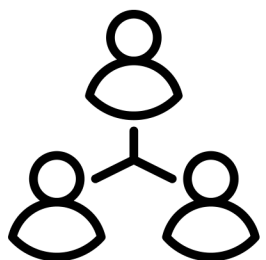
20+ Countries



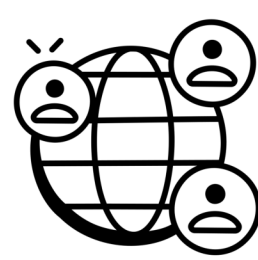
60+ Tier 1 Suppliers



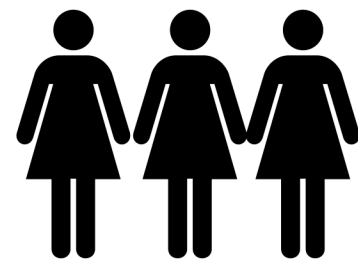
1000+ Product Lines



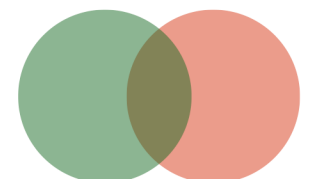
103 LDH Employees



32,358 Tier 1 Employees



18212 Tier 1 Female Employees





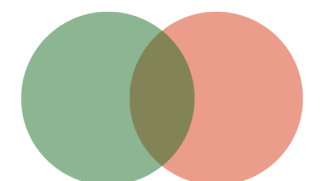
# OUR SUPPLY CHAINS

## Communication Strategy

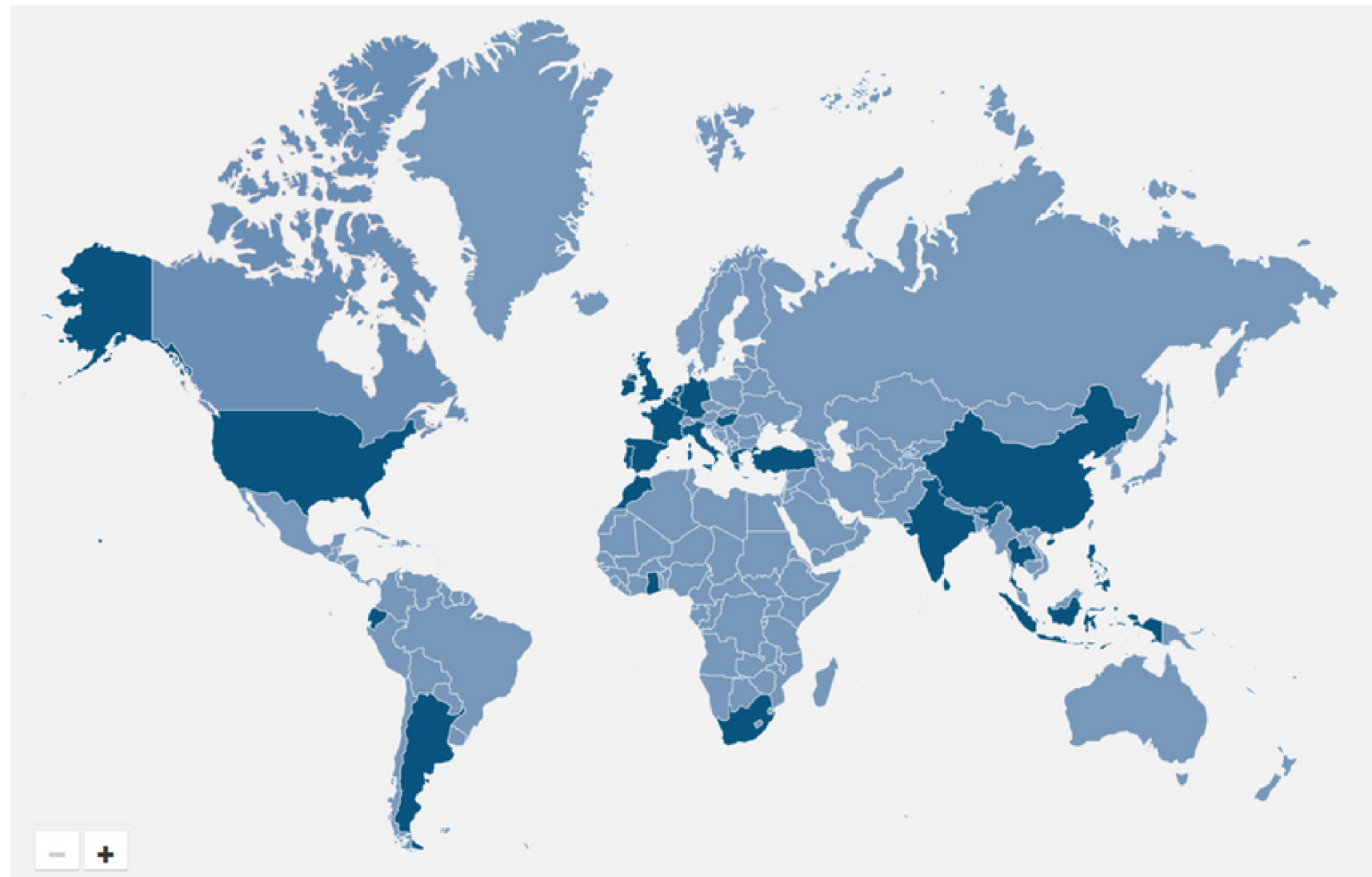
Communication	Tier 1 Suppliers
LDH Policies	All LDH policies are communicated when onboarding & updated if any revisions are made.
Customer Policies	All relevant customer policies are communicated & acknowledgement of compliance is required.
Legislation Updates	New legislation & guidance are communicated to ensure implementation across the supply chain where relevant.
Supplier Questionnaire/ Sedex SAQ	Questions to enhance annual risk assessment data/ SAQ every six months on Sedex
Risk Rating/ Audit schedule	Advise sites of risk rating allocated by each customer and the audit frequency required. Send 3-month audit schedule reminders to sites.
Corrective Action Plan	Discuss corrective action plans from audit outcome, roadmap & timelines to rectify and close non-compliances. Regular updates with sites and customers.

The company's focus is on private-label ranges, predominantly ambient pasta, vegetables, pulses, fruits, fish, chocolate, cooking sauces, and condiments. Due to the nature of products, the majority are sourced from outside the UK, with global sourcing of ingredients and commodities. Given that no country is fully exempt from modern slavery and human trafficking risks, we acknowledge that our supply chains and manufacturers need to be aware of and mitigate these risks. LDH has established due diligence processes and communication channels with Tier 1 suppliers which include communicating LDH and customer human rights and ethical trade policies, requirements on Tier 1 social audits and risk assessment questionnaires. We have developed strong, long-term relationships with our Tier 1 suppliers globally and have broadened our supply chain mapping process to cover an increased range of salient products back to source.

Tier 1 suppliers are responsible for conducting due diligence and internal audits on Tier 2 and raw material suppliers. LDH require further transparency across all tiers to conduct enhanced supply chain due diligence.



# LDH PROCUREMENT MAP 2023



## Country List

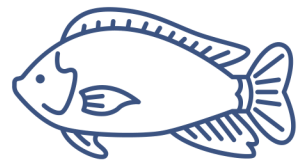

Belgium	Malta
China	Morocco
Ecuador	Netherlands
France	Philippines
Germany	Portugal
Ghana	Seychelles
Greece	South africa
Hungary	Spain
India	Turkey
Indonesia	Thailand
Ireland	UK
Italy	USA

## High Risk Countries

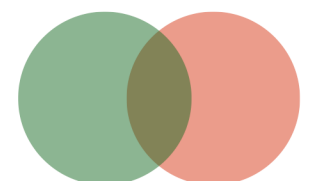
China		Morocco
India		Philippines
Indonesia		Turkey
		Thailand

(Determined by SEDEX Radar Inherent Risk Score)

## High Risk Products Identified

	
Seafood	Tomato

(Determined by LDH risk assessment)





# POLICIES IN RELATION TO MODERN SLAVERY

In line with the United Nations Guiding Principles on Business & Human Rights (2011), we are committed to upholding the principles set out in the UN Declaration on Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (1998). Under these principles, LDH (La Doria) Ltd (LDH) has developed systems and controls to identify and address the risk of modern slavery within our business and supply chains.

In 2018, we began developing our responsible sourcing strategy. This included the design and implementation of LDH's responsible sourcing risk assessment framework. In early 2021, we enhanced our due diligence process by updating our risk assessment framework and through the development of a company-wide Human Rights Policy and a Supplier Code of Conduct covering modern slavery and human trafficking. These documents were created with support from an external human rights consultant and stakeholders across the business. In 2022, these documents were reviewed to ensure they were still relevant.

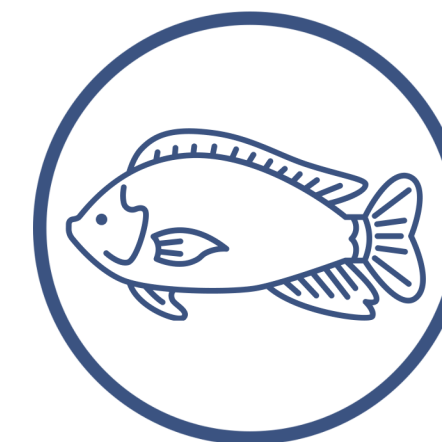
**Human Rights Policy**



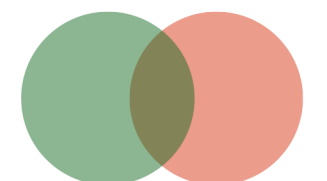
**Supplier Code of Conduct**



**Seafood Sourcing Policy**



**Human Resource Policy**



## Supplier Code of Conduct

Our Supplier Code of Conduct was created in early 2021. The Supplier Code of Conduct sets out LDH's expectations of our suppliers, labour providers, service providers, contractors, and sub-contractors (collectively referred to as "suppliers") concerning social and environmental practices. Suppliers are responsible for ensuring that this Code of Conduct and all relevant laws and regulations are complied with in their business and respective supply chains. Where the requirements of this Supplier Code of Conduct set a higher standard than is required by local laws and regulations, suppliers must align with the requirements of this Supplier Code of Conduct. We expect our suppliers to communicate the principles of this Code to workers and suppliers in their supply chain.

## Seafood Sourcing Policy

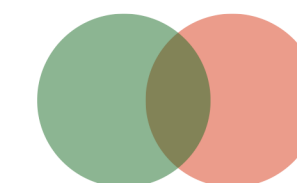
LDH requests that our supply chains implement standards that align with ILO 188, which entitles all fishermen to written terms and conditions of employment, decent accommodation and food, medical care, regulated working time, repatriation, social protection and health and safety on board. At LDH we are committed to social accountability in fisheries and across all stakeholders within the supply chain. To carry out due diligence LDH conducts supply chain mapping of the value chain with a focus on fisheries, vessels and processors exposed to higher human rights risks. This model provides transparency and accountability across seafood supply chains.

## Human Rights Policy

Our Human Rights Policy outlines the minimum standards that we adhere to and expect our suppliers to follow to ensure human rights in the workplace. The policy applies to all LDH facilities and our supply chain and is based on the ETI base code. LDH implement policies and processes to identify, prevent and mitigate any adverse human rights violations. This policy is effective through LDH's processes, for example, our risk assessment, management and monitoring mechanisms.

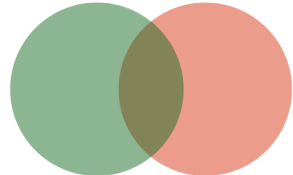
## Human Resource Policy

Our company handbook ensures that recruitment practices are transparent and fair, with all workers provided with clear and understandable terms of employment. The policy also includes provisions for educating employees about grievance mechanisms and whistle-blowing, which include modern slavery and human trafficking. This ensures that workers can report concerns without fear of retaliation, ensuring adequate protection for employees who raise grievances or make protected disclosures. Lastly, it emphasises the company's dedication to compliance with local and national laws regarding labour rights, reinforcing its commitment to human dignity and ethical business practices.



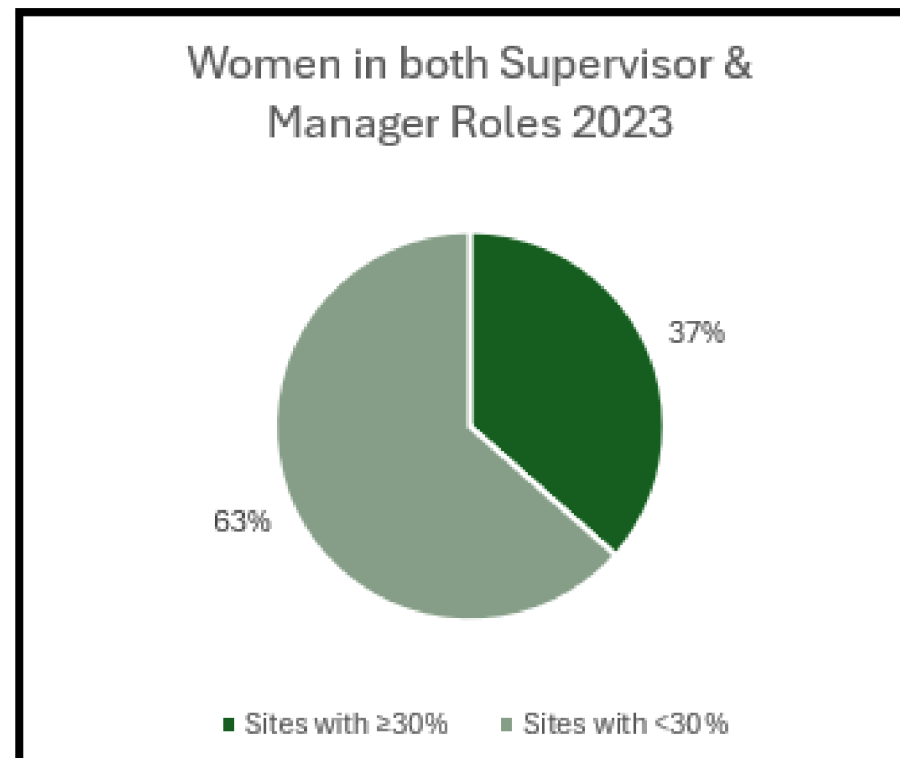


Policy	Overview	Communication & Implementation
Supplier Code of Conduct	LDH requirements of suppliers with respect to social and environmental practices across the supply chain	<p>The document is sent to all Tier 1 suppliers who are asked to inform us regularly about their actions and improvement plans and areas of the Code of Conduct that present challenges to their business. Key areas cover:</p> <ul style="list-style-type: none"> <li>• Supplier compliance to LDH &amp; customer policies</li> <li>• Management systems, traceability &amp; transparency</li> <li>• Responsible recruitment</li> <li>• Grievance mechanisms</li> <li>• Gender &amp; inclusion</li> </ul> <p>Tier 1 suppliers are responsible for communicating and monitoring this Code of Conduct in their business and their supply chains.</p>
Human Rights Policy	LDH principles & standards aligned with ETI Base Code for internal & external stakeholder fulfilment	<p>The policy is sent to all Tier 1 suppliers who are required to implement and cooperate with the following due diligence requirements:</p> <ul style="list-style-type: none"> <li>• Third-party social audits</li> <li>• Corrective action plan &amp; non-compliance closure progress (dialogue)</li> <li>• Supplier Audit Questionnaires (SEDEX)</li> <li>• Annual risk assessment (LDH questionnaire &amp; SEDEX)</li> <li>• High-risk sites action plans (Collaborative dialogue, roadmap &amp; timeline on delivering continuous improvement)</li> </ul>
LDH Seafood Sourcing Policy	Includes commitment to social accountability in fisheries and along the supply chain	<p>The policy is sent to all Tier 1 suppliers who are required to implement and cooperate with the following due diligence requirements:</p> <ul style="list-style-type: none"> <li>• Fishery and processor social risk assessments (Sea Alliance Fishery Risk Tool, Global Slavery Index, Sedex Flag State Risk Rating)</li> <li>• Supply chain mapping (Data collection via Tier 1 supplier )</li> <li>• Vessel Crew data ( Data collection via Tier 1 supplier)</li> <li>• Advocacy (Sea Alliance Membership)</li> <li>• Engagement with relevant NGOs, trade unions and experts.</li> </ul>
Human Resource Policy	Includes LDH policies on responsible recruitment, grievance mechanisms & whistle-blowing	<p>The policy is sent to all staff when onboarding and is available on the LDH staff portal to review. All sections of the policy outline implementation &amp; communication methods.</p>

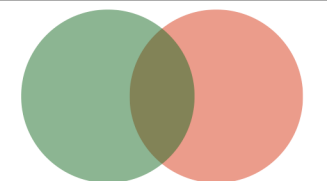


# RISK ASSESSMENT, PREVENTION & MITIGATION

While we have continued to deliver our annual risk assessments and site action plans, in 2023 we laid out a plan to develop our human rights program beyond compliance. There were four areas of focus within our supply chains:

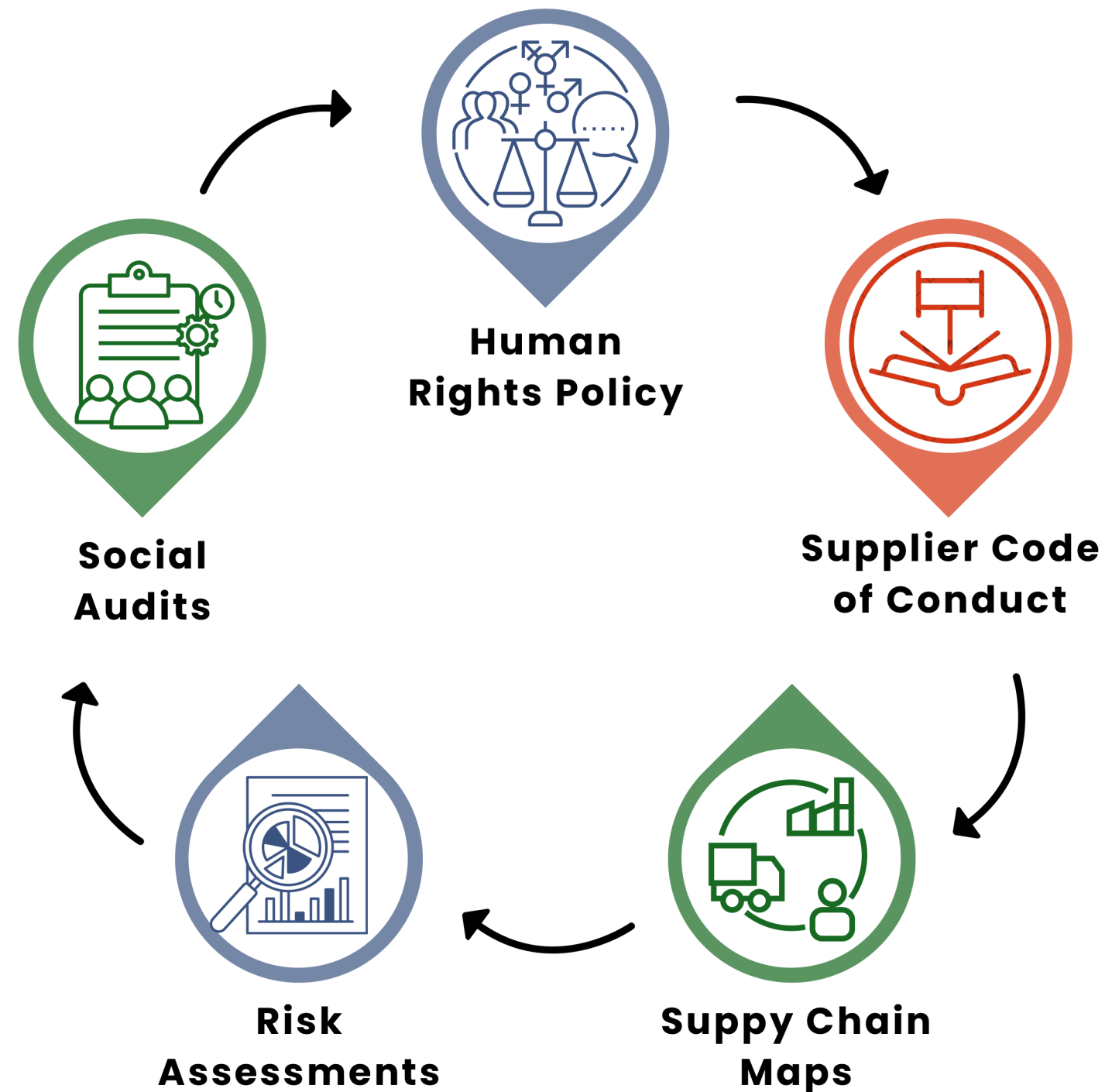


INDICATOR	ACTIVITY	OUTCOME
Responsible Recruitment	Verified the information provided in 2022 and expanded data collection of salient supply chains to map high risk in responsible recruitment.	<ul style="list-style-type: none"> <li>Require further data gathering on stakeholders beyond Tier 1.</li> <li>In 2024 create a responsible recruitment plan, aligned with customer requirements.</li> <li>Joined the Sea Alliance working group on Responsible Recruitment in Tuna.</li> </ul>
Gender	Engaged in gender and inclusion seminars to enhance knowledge. Continued data collection on women employed across Tier 1 sites and percentage of women in senior roles.	<ul style="list-style-type: none"> <li>Approximately 2/3 of sites have ≥30% women in senior roles.</li> <li>Develop an LDH gender plan in 2024.</li> </ul>
Horizon Scanning	Horizon Scanning tool covering human rights to establish if there were any emerging issues which could affect our supply chains.	<ul style="list-style-type: none"> <li>Additional human rights checks were conducted with our pineapple grower as a result of negative media on human rights issues from Kenyan pineapple farms.</li> </ul>
Worker Voice Project	Project to gather insights on salient human rights issues directly from workers at tomato farms, particularly around forced labour, work & living conditions of seasonal workers.	<ul style="list-style-type: none"> <li>84 workers surveyed</li> <li>Themes attracting the most negative perception: Freedom of Association, Fair &amp; Timely Remuneration, Health &amp; Safety.</li> <li>2024 additional grower participation.</li> </ul>





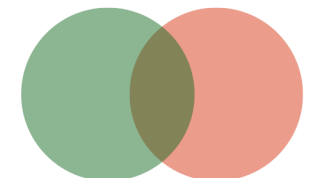
# DUE DILLIGENCE PROCESSES



## Site Approval

LDH has been a member of Sedex (Supplier Ethical Data Exchange) since 2007 and we require all of our suppliers to be Sedex members and to complete the Sedex Self-Assessment Questionnaire (SAQ) every six months. SAQ is the first step in helping us understand the working conditions, recruitment, labour management, policies and workforce demographics at the individual site level. In addition, we continue to extend our process of mapping salient supply chains back to the source with in-depth details regarding farm workers and vessel crews.

Third-party audits to assess compliance against the ETI Base Code at Tier 1 and assessments such as GRASP at grower level help determine whether human rights risks and violations are present. But they are only one tool within the evolving LDH toolkit against modern slavery. Open and transparent relationships with our suppliers are also essential to know, understand and improve working conditions in our supply chains. Our assessment process for supplier selection is conducted to form long-term partnerships with frequent communication, both remotely and on-site. We carry out these assessments using a range of technical and ethical performance indicators and targets, including risk assessments, action plans, supply chain mapping and social audits.



## Supply Chain Mapping

We recognise that modern slavery risks exist in our supply chains therefore, we have taken practical steps to identify and prioritise addressing these risks. In early 2021, we further enhanced our responsible sourcing strategy by creating a new supply chain mapping template and distributing this to our supplier base. Our new mapping template collects more detailed information at the farm and vessel level, enabling us to look at areas of potential risk beyond our tier 1 suppliers. In 2022, we reviewed our mapping template to ensure it was still relevant. In 2024 we will further enhance our supply chain mapping template, focusing on high risk fish and tomatoes supply chains.

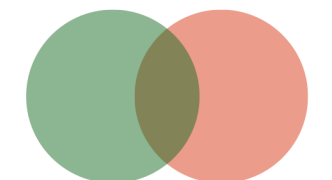
## Social Audits

SMETA (Sedex Members Ethical Trade Audit) audits are conducted at sites by third-party auditors on a risk basis as determined by customer policy. Audits provide verified visibility of working conditions and insight into worker feedback. The SMETA audit reports published on Sedex provide audit feedback and a corrective action plan for non-compliance against the Ethical Trading Initiative's (ETI) Base Code. Compliance with the ETI Base Code is regarded as the most rigorous benchmark at the factory level of best practice for working conditions, verifying labour agencies, recruitment fees, and grievance channels. At the farm level, we have an expanding number of our growers implementing Global G.A.P GRASP, assessing the risks associated with child labour and forced labour. In 2024, we will introduce a mandatory requirement for all sites to conduct a SMETA audit.

## Risk Assessments

Each year each of our tier 1 suppliers is risk assessed against LDH's responsible sourcing risk assessment framework. In 2021, our risk assessment methodology was updated and included information from SMETA audit reports, Sedex SAQs and Sedex inherent risk scores, as well as information on the capacity and capability of the site to manage ethical issues. Each supplier that we work with is scored against these criteria and the outcome of the assessment is a better understanding of the modern slavery and human rights risks by supplier. This risk rating helps to prioritise and inform annual supplier action plans, which are developed in dialogue with suppliers. In 2023 four suppliers were categorised as high-risk and action plans were developed and progressed.

In 2024 we will further develop the risk assessment framework to include extended qualitative and quantitative data points including supplier policies and reported grievances.





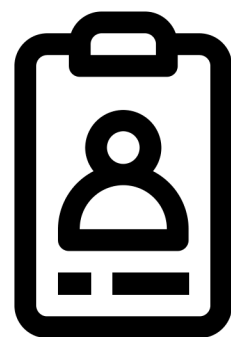
# KEY PROGRESS INDICATORS

To date, LDH has primarily used Sedex to understand and monitor supplier ethical progress and performance through SAQs and SMETA audits. The latter gives an extensive overview of supplier compliance in line with national labour legislation and the ETI Base Code. Building on that, we deploy our responsible sourcing assessment framework to evaluate supplier performance against known risks and indicators

We recognise the importance of building improvement plans with all our suppliers, but we prioritise high-risk sites for action plans before moving onto medium-risk sites. Sites should continue to improve as we continue to have detailed and targeted conversations with suppliers on forced labour risks and solutions.

Our targets for the next three years focus on moving all high and medium-risk suppliers to medium or low-risk and increasing our visibility at lower tiers of the supply chain. We plan to achieve progress through action plans, regular stakeholder dialogue and monitoring of supplier audit performance. We recognise the importance for all workers in our supply chains to be allowed to raise grievances, this is actively monitored through our risk assessment process. We are working with suppliers to improve these feedback and dialogue mechanisms.

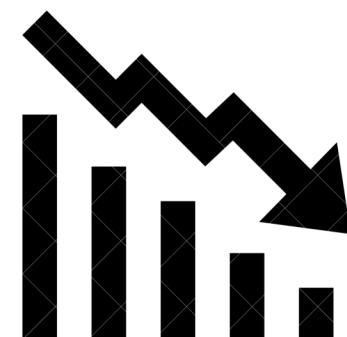
Suppliers that fail to improve compliance against their action plan should communicate with us on how to implement immediate corrective action. LDH provides increased support and assistance where necessary to help build capacity and capability.



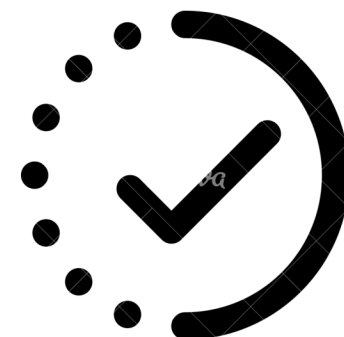
SEDEX registration



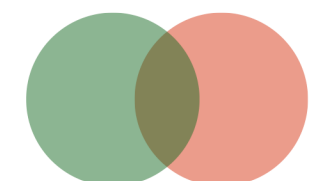
SAQ completion



Reduce critical NCs



Audit NC closure within timescale





We plan to focus on sites with critical non-conformances raised to ensure no repeat non-conformances in future audits. We will achieve this by supporting sites to develop robust action plans based on the root cause and analysis.

KEY INDICATOR	ACTIVITY	OUTCOME
All sites registered on Sedex	Ensure all sites are registered and linked to LDH. All suppliers links must be indirectly shared with the customers.	<ul style="list-style-type: none"> <li>• LDH &amp; customers can monitor the audit progress of each site, SAQ results and RADAR ratings on SEDEX.</li> </ul>
SAQ completed every 6 months at 100%	Ensure all sites are informed when their SAQ is due for an update & that SAQ is completed within the required timeframe.	<ul style="list-style-type: none"> <li>• LDH &amp; customers can review the data provided in the SAQ.</li> <li>• Risk ratings are subject to change depending on the SAQ answers submitted, which can consequently change the audit requirements for a site.</li> </ul>
Reduction in the number of critical non-compliances received (TYvs LY)	Monitor critical non-compliances received for each site & engage with the site to ensure these are closed within the timeframe allocated. Inform customers on the action plan and progression of closure.	<ul style="list-style-type: none"> <li>• Identify root causes &amp; solutions with the site.</li> <li>• Mitigate repeat non-compliance.</li> <li>• Implement long-term solutions for the issue raised.</li> </ul>
All audits NCs closed out within the specified timescale.	Liaise with the site to address all raised non-compliances, to develop and communicate an action plan to address root causes and effective solutions.	<ul style="list-style-type: none"> <li>• Ensure all desktop evidence is uploaded within the given timescale.</li> <li>• Site to book a follow-up audit window before the closure date expires.</li> <li>• Communicate any derogation, issues or disputes with the customers to inform them of delays.</li> </ul>



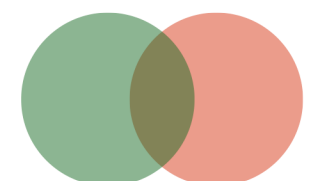
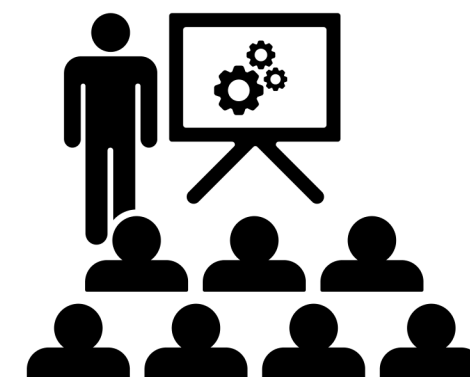
# TRAINING & CAPACITY BUILDING

We are committed to raising awareness about human rights risks, including modern slavery, across our business and supply chains. In 2018, we developed a training programme to help understand and identify modern slavery risks. This programme aimed to increase the capability for detecting modern slavery issues during technical supplier audits, which complements the visibility provided by SMETA audits. In addition, we conducted modern slavery training at the Director level, with the participation of 80% of the relevant staff. Our Responsible Sourcing Manager has invested in training with Stronger Together and will continue in 2024 with additional training conducted by Sedex & Oxfam.

Our staff training demonstrates a proactive approach to addressing these complex ethical issues. To support this further, we are evolving and strengthening our approach to provide a greater understanding of the issues surrounding modern slavery from the source of the product and throughout the supply chain. It will enable us to advance the development of skills, processes and resources within our organisation. Further training and capacity building is regularly scheduled for relevant staff across LDH.

TRAINING 2023
Responsible recruitment
Labour supply chain due diligence
Tracking modern slavery in global supply chains
Tackling labour exploitation in UK warehousing

TRAINING 2024
Sustainable supply chains
Employee Pays Principle workshop
Grievance mechanisms in agriculture
Advanced tackling labour exploitation in UK businesses
New SMETA training
Applying a gender-sensitive approach to human rights due diligence
Effective grievance mechanisms
Increasing representation of women in leadership

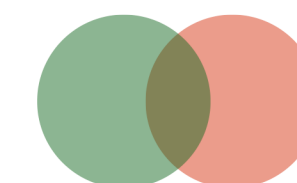




## Collaboration & Engagement

LDH recognises entrenched, systemic socio-economic realities that negatively influence worker and stakeholder rights. We also acknowledge that addressing the source of modern slavery and human trafficking is often beyond the leverage of any single buyer or supplier. Therefore, LDH are members of FNET and contribute to several working groups. We are also a member of the ETI Italian Agriculture working group and various other category-specific groups developed to advocate for positive change in complex and distant supply chains where direct influence isn't achievable. In 2024, we will continue our working group membership, broadening the scope to ensure some of our more complex and challenging supply chains, including wild-caught seafood.

PARTICIPATION	2023	2024
FNET Working Groups	Responsible Recruitment Climate & Human Rights Developing Common Due Diligence Tools	Responsible Recruitment Climate & Human Rights Developing Common Due Diligence Tools
ETI Working Group	Grievance Mechanisms in Italian Agriculture (Tomatos)	Grievance Mechanisms in Italian Agriculture (Tomatos)
Sea Alliance	Active membership	Worker Driven Social Responsibility (Fishing)
Employer Pays Principle Study	Tuna Processing Sector	Tuna Processing Sector



# NEXT STEPS IN 2024



## Enhanced Stakeholder Collaboration

Strengthen partnerships with key stakeholders to identify and mitigate modern slavery and human rights violations within our supply chains. Collaborative efforts will extend our reach and foster knowledge exchange.

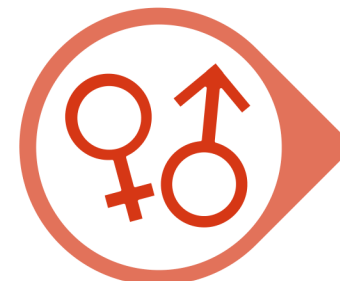
**Develop & expand Tier 1 risk assessment framework**  
Gather in-depth data on site performance via quantitative and qualitative increased data points.



## Develop salient supply chain mapping process & data collection

Focus on seafood tomato supply chains as identified high-risk, complex commodities.

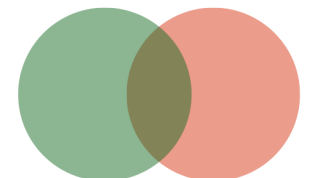
**Expand Worker Voice participation**  
Further collaboration to onboard additional growers and farm workers to take part in the Worker Voice survey for 2024.



## Gender Equality Plan

Enable tools to increase women's rights and voices in the workplace, measure and report on progress to achieve gender equality.

**Knowledge training & implementation of CSDDD**  
Attend training and workshops to understand Corporate Sustainability Due Diligence Directive (CSDDD) requirements within our business and supply chain. Implement a communication plan with stakeholders to manage expectations.





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