



## MODERN SLAVERY STATEMENT – 2023

### Introduction

This is the Modern Slavery Statement of Froneri Limited and its subsidiaries, Froneri International Limited and Froneri Ice Cream UK Limited (formerly R&R Ice Cream UK Limited) (together “Froneri”).

Froneri Limited is the ultimate UK parent of the Froneri group and Froneri International Limited is the parent of the operational group, providing central support and services to its operational companies worldwide. Froneri Ice Cream UK Limited is Froneri group’s main operating business in the UK.

Froneri is a global ice cream manufacturer with its head office in the UK.

This Modern Slavery Statement details Froneri’s actions and activities during the financial year 1<sup>st</sup> January to 31<sup>st</sup> December 2023 to prevent modern slavery taking place in our business and supply chains.

### Organisational Structure and Supply Chains

Froneri group operates 30 factories in 24 countries across the world, employing over 12,000 people with sites in the United Kingdom, Europe, Australia, New Zealand, the Middle East, Argentina, Brazil, the Philippines, South Africa, Puerto Rico and the United States. Froneri operates a decentralised model with international subsidiaries operating as standalone businesses and relying on Froneri International Limited for central business support and group policies. Froneri group operates in the UK through its operating business Froneri Ice Cream UK Limited across 3 manufacturing sites.

The nature of the supply chain principally relates to the provision of food ingredients and packaging as well as the labour used in the manufacturing process.

As a food manufacturer we have suppliers located throughout the world. We are aware that, like other companies in the sector who draw on similar supplies, we are exposed to a level of modern slavery risk through our UK and global supply chains. We are therefore committed to the prevention of modern slavery and human trafficking both in our business and in our supply chains and have a zero-tolerance approach to modern slavery.

We recognise that the sector in which Froneri group operates means that our raw material and packaging suppliers present the biggest risk of exposure to modern slavery through our supply chains. Froneri has a group Supplier Code which sets out Froneri’s expectations of suppliers in respect of modern slavery, and which is enforced with relevant suppliers, who are required to communicate the content of the Supplier Code to any subcontractors and their employees. All Froneri suppliers of raw materials and packaging are also required to complete a Supplier Questionnaire at point of onboarding which requires confirmation of compliance with minimum standards of environmental and social responsibility based on international standards and guidelines and confirms the supplier’s agreement to Froneri’s Supplier Code.



Froneri reserves the right to carry out audits of relevant supplier's premises in order to verify compliance with the Supplier Code or with the minimum standards agreed to in the Supplier Questionnaire.

The Supplier Code requires all relevant new and existing suppliers to join Supplier Ethical Data Exchange (SEDEX) (or equivalent platform preferred by the supplier) and complete a Self-Assessment Questionnaire (SAQ) on labour management, employment, health & safety and environment within their business. With the support from SEDEX and other platform providers used by our suppliers, we increase our visibility of our supply chain.

### **Policies in relation to modern slavery and human trafficking**

Froneri manages modern slavery risks and has taken steps to prevent modern slavery occurring in our business and our supply chain with the following policies and practices:

- **Modern Slavery Policy:** In 2021 a Froneri Group Anti-Modern Slavery Policy and supporting documentation was implemented, prepared with the assistance of specialist external lawyers and approved by Froneri Group Board. This Policy outlines our expectations in respect of modern slavery and strengthens our approach to due diligence and is reviewed annually and updated as required (last version effective from 12<sup>th</sup> February 2024).
- **Labour Practices:** we adopt and implement labour practices that meet or exceed recognised international standards and, through promotion, monitoring, training and audit verification, seek to maintain these standards across the group.
- **Whistleblowing** and reporting hotline available to all Froneri colleagues worldwide, and is free, anonymous, and confidential to allow employees to raise matters of concern. The contact details are communicated to colleagues by each business (e.g. displayed on notice boards at all UK sites and embedded within the induction programmes). All new starters are encouraged to report any concerns including risks of slavery and human trafficking. Froneri's Integrity Call Group Policy was first implemented in 2019 and is reviewed annually and updated as required (last version effective from 12<sup>th</sup> February 2024), which explains to process for reporting concerns of misconduct or wrongdoing. The whistleblowing procedure is designed to make it easy for workers to make full disclosures without fear. The whistleblowing procedure allows for issues of concern to be escalated to country leadership or group level so that they can be dealt with properly.
- **Group Employee Code of Conduct** confirms that all employees worldwide understand what is required from them in terms of setting the standards on how we work together. It covers a range of issues relating to professional behaviour as an employee and how to conduct business ethically. The Code of Conduct is reviewed annually and updated as required (last version effective from 12<sup>th</sup> February 2024).
- Commitment to **responsible sourcing** by adopting the Ethical Trading Initiative ("ETI") base code of labour practices.
- **Staff engagement surveys** provide opportunities for employees to raise concerns on any matter including slavery or forced labour.



- **Annual Ethical Trading Audits** take place within our own UK factories, conducted by an independent third-party.

Froneri's international subsidiaries apply group policies and procedures and supplement these with local controls based on local laws.

### **Due diligence and processes**

Froneri undertakes risk based due diligence on new and existing suppliers in order to limit the risk of modern slavery in our supply chain and has in place systems to encourage the reporting of concerns by suppliers and the protection of whistleblowers.

Our Supplier Code includes a requirement for relevant suppliers (i.e. raw material and packaging suppliers) to join online platform SEDEX (or another approved platform), to manage and improve working conditions in global supply chains.

As well as our Supplier Code requiring raw material and packaging suppliers to join SEDEX, (or other approved platform), we encourage relevant suppliers to undertake their own ethical trading audits, and we conduct regular reviews of existing suppliers, including Self-Assessment Questionnaires (SAQ) and ethical trading audits. During 2023, we continued to review and collate SAQs from our suppliers, to provide us with assurance that our suppliers are operating in a way that meets our ethical standards.

In early 2022, the UK business launched a new Procurement Policy, which includes specific requirements for onboarding suppliers, undertaking supplier due diligence checks, and guidance for conducting enhanced due diligence for key suppliers. In 2023, the UK business has focussed on effective implementation of the Policy requirements and sharing knowledge with Froneri's other international subsidiaries, all of which are actively encouraged to regularly review their onboarding processes including assessing improvements to supplier due diligence checks.

Due diligence processes are similarly built into our labour practices through which we seek to meet or exceed recognised international standards and, through promotion, monitoring, training and audit verification, maintain these standards across the group. This includes onboarding checks for employees, for example, in the UK, we conduct 'right to work' checks on all new employees which are verified and approved by UK Head of HR. Additionally, bank accounts are checked and verified to match each individual employee.

### **Risk assessment and management**

As part of our commitment to combatting modern slavery in the UK, we carry out third party ethical audits of relevant domestic and international suppliers via SEDEX or, alternatively, under a third party's own system. All audits conform with ETI requirements and are uploaded to the SEDEX platform. We regularly review this audit information and will continue to risk assess relevant suppliers via supplier audits in 2024 and via SEDEX engagement projects.

Each year, as part of our commitment to combatting modern slavery in the UK, the UK business run a Supplier Engagement Project conducted by SEDEX. This Supplier Engagement Project continued in



2023 with the aim to encourage and support relevant suppliers to renew their SEDEX membership, to support the objective to have SAQs completed by at least 95% of suppliers and to support suppliers in linking to Froneri on the platform so that the supplier SAQ information is visible to Froneri. Our suppliers are allocated to agents within the SEDEX engagement team, depending on geographical location and language requirements.

Our technical and supply chain staff also visit key suppliers, to conduct an audit of their premises, and ensure they maintain and operate, as a minimum, to our standard requirements. In 2023, 120 supplier technical audits were conducted for relevant suppliers both in the UK and across the wider Froneri group using a specialist third party and including an audit of key Ethical, Social and Governance requirements.

We employ purchasing procedures that select suppliers based on a number of factors, including the extent to which suppliers demonstrate that they operate in an ethical and socially responsible manner.

### **Measuring effectiveness**

We regularly review our performance against the measures we have in place. In respect of our UK business this is managed via our annual third-party ethical trading audits which identify any non-conformances and provide a corrective action plan to ensure we are maintaining the highest standard of ethical trading at all times. During 2023, Bureau Veritas performed ETI audits at 1 of our UK sites, with audits planned for the remaining 2 UK sites during 2024. Froneri's UK operating sites are also independently audited by our customers at a frequency determined by our customers and we maintain full data disclosure under the SEDEX system for all sites. Froneri's other international subsidiaries are encouraged to undertake their own ethical trading audits.

We monitor and categorise concerns reported to us (either via our whistleblowing line, or other channels) and continue to assess the need for further action to be taken and other key performance indicators to be implemented as we continue our risk assessment and due diligence activities. In 2023, there were no reported incidents of forced labour or related modern slavery issues at any of our UK or other operating sites worldwide or within our global supply chains.

Staff engagement surveys also offer employees the opportunity to address any concerns, including those related to slavery or forced labour and are conducted for each Froneri group business either annually or every two years. In 2023, all UK employees were surveyed by an independent third party and asked to feedback anonymously on various aspects such as employee experience and safety. No issues pertaining to slavery or forced labour were reported during this survey, or any other survey conducted for other Froneri group businesses in 2023.

### **Training on modern slavery and trafficking**

We take our responsibility to be alert to the risks of modern slavery very seriously and actively raise awareness of the risks of modern slavery with all our colleagues.



Everyone in our business undergoes induction training, which includes a section on Code of Conduct (and more specifically in the UK on modern slavery). It provides a clear message to work together to tackle hidden labour exploitation and how to report any concerns. It enables our employees to understand and spot the signs of modern slavery and human trafficking.

Froneri has a group e-learning platform which is used to provide training annually to colleagues globally on various compliance topics. In 2023, Froneri changed its group e-learning platform provider with new content being created, and existing training modules refreshed as a result (including work on completing a focussed modern slavery module for global rollout). The existing global e-learning suite includes a Code of Conduct module, which includes general awareness on modern slavery and, was last completed by all office-based colleagues in 2022, with an awareness video recorded and provided to those colleagues outside of office-based roles.

The UK business also repeated its guidance to employees in 2023 through its Stronger Together communication, which applies to all employees and those working on our behalf (including contractors and agency workers). The guidance is communicated during induction training and displayed on noticeboards at each of our UK sites. The guidance provides a clear message to work together to tackle hidden labour exploitation and how to report any concerns. It enables our employees to understand and spot the signs of modern slavery and human trafficking.

In 2023, a number of UK business employees participated in training courses organised by the Association of Labour Providers in compliance with the Gangmasters Licensing Authority, including attendance by key managers responsible for onboarding new personnel within the UK operations at the Labour Provider Compliance Due Diligence Workshop and members of the UK supply chain team participating in a workshop focused on addressing modern slavery through procurement practices.

It is a responsibility of all managers to ensure that Froneri policies are properly communicated, understood, and applied, and to undertake full investigations into suspected breaches of Froneri policies, rules, and guidelines.

Employees are encouraged to advise their managers as soon as possible where they either suspect or believe there has been a breach of Froneri's ethical standards.

### **Next Year**

The plan for 2024 is to continue to develop our approach to combatting modern slavery and human trafficking and we will continue to assess and manage risks on an on-going basis.

In 2024, we will continue to enforce the Froneri Group Anti-Modern Slavery Policy, ensuring each Froneri operating subsidiary has a fully implemented local Anti-Modern Slavery Policy in line with group minimum standards and local laws. This will continue to be monitored by Group Internal Audit, with Group Legal supporting the local teams where required.

A new Froneri Group Supplier Management Policy will be introduced in 2024, requiring each Froneri group business to implement its own local Supplier Management Policy in line with group minimum Policy requirements and local laws. This includes minimum requirements for supplier due diligence and audit to further strengthen and standardise supplier due diligence across the group.



A plan is being developed for focussed modern slavery compliance training to roll out to all relevant staff.

Supplier audits, and audits of our own factories, will continue in 2024. 180 supplier technical audits are in scope for 2024 globally.

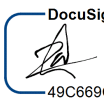
We will continue to review our existing supply chains and work to on-board remaining raw and packaging suppliers on to the SEDEX (or alternative approved) platform.

All Froneri operating subsidiaries will continue to work to improve local supplier due diligence processes, in accordance with Group Supplier Management Policy and in accordance with local legislation.

We will continue to use employee engagement surveys to consult and collaborate with staff across all Froneri businesses worldwide. It is anticipated that the results from such surveys will help our internal audit and HR teams to identify behaviours and practices that could lead to a failure of ethics, controls, or governance, before they occur.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2023.

This statement has been approved by the boards of directors of Froneri Limited, Froneri International Limited, and Froneri Ice Cream UK Limited.

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Phil Griffin  
Deputy Chief Executive Officer