

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT.

MAKING **FOOD TO FEEL GOOD**

For Financial Year 2023 to 2024



CONTENTS

INTRODUCTION

OUR BUSINESS AND SUPPLY CHAIN

UK IMPLEMENTATION

- Recruitment
- Speak Up & Whistleblowing
- Training
- Outsourced manufacturing

MANAGING RISK

- Risk assessment
- Audits

COLLABORATION

TARGETS

- KPIS

OBJECTIVES

INTRODUCTION

The Compleat Food Group recognises the imperative need to address modern slavery and human trafficking within our supply chains and business operations. As mandated by the Modern Slavery Act 2015, this statement confirms our commitment to eradicating violations of human rights.

As a group, we believe in the fundamental dignity and rights of all individuals. This Modern Slavery Statement serves as a testament to our unwavering pledge to uphold ethical standards and ensure transparency throughout our operations and supply chain. It outlines the measures we have implemented and continue to develop to prevent, detect, and address instances of modern slavery and human trafficking.

We are committed to fostering a culture of accountability, integrity, and respect for human rights and as a business we follow the requirements of the Ethical Trade Initiative (ETI), requiring all suppliers to comply with this.

This Statement, which is reviewed on an annual basis, has been approved by our Board of Directors.

Signed



Nick Field
Chief Executive Officer
The Compleat Food Group



OUR BUSINESS

Formed in 2021, The Compleat Food Group is a food group on a mission to create great quality, tasty and affordable food, that people love to eat.

We're committed to doing it in a sustainable way that delivers a positive impact on the world and maximises the well-being of the communities we are part of.

At The Compleat Food Group, we're home to exciting brands including Pork Farms, Wall's Pastry, Squeaky Bean, Unearthed, Vadasz, Wrights and Palace Culture. We're also a leading supplier of delicious own-label pastry, sweet bakery, party food, olives and antipasti, continental meats, dips and sauces and plant-based food to the UK's largest food retailers and foodservice companies.

Employing more than 4,600 people across 14 sites, our ambition is to become the UK's No 1 chilled prepared food company measured by ESG, culture and business performance.

Each of our sites has its own area of specialism with expert teams focused on category leading innovation continually delivering premium quality products and service to new and long standing customers.



OUR SUPPLY CHAIN

Our supply base is complex, with manufacturing sites based in the UK and throughout Europe. We have strong, long standing supplier relationships with many of our European Outsourced partners which assists in the transparency of sourcing.

Our 14 UK sites and 80 European partners source ingredients from over 500 suppliers across the globe. We have used digital mapping for over 10 years to provide full transparency of the supply base back to the farmer or grower of key raw materials. This well established technology helps us identify potential human rights risks posed within supply chains.



UK IMPLEMENTATION

While our Human Resources and Ethical teams take a lead role on upholding human rights, all our departments are accountable and work together to achieve our goals. Monthly Group ethical meetings are held to focus on key human rights issues within our supply chains which includes emerging risks and driving longer term objectives.

RECRUITMENT

As part of our terms and conditions with recruitment agencies, key requirements to mitigate slavery are incorporated. A robust recruitment policy and set of practices exist, in line with UK legislation, including right to work document checks, contracts of employment and ensuring that personal information provided is genuine.

The company are members of the Association of Labour Providers (ALP), which provides information and support to all the UK sites. Our Recruitment and HR functions have access to their specialised training. Also the company is a member of Responsible Recruitment Toolkit (RRT).

All labour providers are audited before commencing supply and then at least annually using Complyer.

Annual due diligence audits are also carried out internally to focus on specific risk areas. All labour providers are members of GLAA where required and Stronger Together .

Labour providers are required to be members of Sedex or to complete the company's Ethical SAQ. The company has a list of approved labour covering all UK sites.

Periodically, randomly selected workers are required to complete a confidential questionnaire on their employment, offering them the means to alert the business to any concerns they may have.



SPEAK UP & WHISTLEBLOWING

In 2024 we launched our new Speak Up procedure across all our sites, providing all employees with a variety of routes to escalate concerns at a site or group level. This is supported by an independent whistleblowing hotline hosted by a third party. This provides the ability to raise concerns anonymously and in multiple languages. We encourage all of our employees to Speak Up through our induction process and induction refresher programmes. All reports are tracked to enable trend analysis across the group, this is reviewed by both the HR & Ethical team to establish future actions

TRAINING

In 2022, we used Tyler Bladon to provide training across all our UK sites raising awareness of the types of exploitation which could be in our sites and our supply chains, along with how to spot the signs. In 2024, the team have put together a video which will be used as part of our induction pack for our colleagues in the roles who are most likely to encounter modern slavery activity and those who are responsible for taking the next steps.

The company are partners of Stronger Together. In 2024, we will be reviewing the training carried out by members of the HR and Ethical Teams agreeing what courses are required and ensuring that this is regularly refreshed.

We take the opportunity throughout the year to raise the awareness of our colleagues to Modern Slavery and its associated risks by participating in events such as National End Human Trafficking Day in July and Anti Slavery Day in October. Sites are provided with case studies, posters and



OUTSOURCED MANUFACTURING

The strong relationships and long term business relationships we have with our Outsourced partners helps us to focus engagement of the manufacturing base in the issues surrounding modern day slavery and human trafficking.

- All suppliers are required to comply with the company's Responsible Sourcing Policy
- To obtain an understanding of the ethical status of new sites before supply commences there is an Ethical section within the New Supplier Questionnaire. This gives initial information which will then be followed by membership of Sedex or Completion of a SAQ depending on the supplier/customer.

Sedex (Supplier ethical data exchange) is a useful tool to the business helping to identify and mitigate risk within supply chains. Sedex provides an initial risk assessment for a supplier taking into consideration known inherent country and industry risks. This allows identification and monitoring of specific high risk products or areas.

- The Company requires all sites that supply UK retailer own brand products to be members of Sedex. Sites must be fully linked to Compleat Food with fully visibility rights of their SAQ and audit information. Sites must have a fully completed SAQ to be reviewed every 6 months.

Production partners that supply branded lines are required to join the Sedex network, or they complete the Compleat Food Ethical SAQ.

Our supply base consists of hundreds of small growers and farmers and reaching out to these producers using appropriate communication methods and materials remains a constant challenge. 2023 enabled us to travel more extensively again after COVID 19 restrictions were relaxed. The ability to visit growers again has been hugely beneficial to get a better understanding of the challenges faced by our supply base. Our technical teams have been undertaking ethical audits as part of their routine visits to high risk sites and with these findings we have been able to identify common areas to focus on upskilling and understanding.



MANAGING RISK

RISK ASSESSMENT

We have a risk assessment through which using the data provided from our supplier SAQ's and Sedex can identify areas of our producer network that need additional focus and support, and we continue to build on this. We are developing risk assessments that combine multiple sources of data to give a more focused approach to identify specific risks at our sites and within our supply chains.

AUDITS

Outsourced

2023 13 SMETA audits undertaken across our Outsourced sites. 8 audits are due to be undertaken in 2024. The company work with a team of global independent auditors to conduct ethical audits. Local auditors who are familiar to the laws, working practices and language of the country where the audit is taking place are used. Audits consist of observations from a site tour, paperwork reviews, confidential employee interviews and management interviews.

UK

In 2023, 6 ethical audits have been carried out at UK manufacturing sites. 2 audits are due to be undertaken in 2024.

If a non-conformance is identified, the company aim to work together with sites and certification bodies to implement sustainable solutions to resolve these issues. The company are part of the Sedex SMETA audit working group developing the new audit standard which our sites will be assessed against.

Audit non-conformances are trended to highlight common areas, which require focus. Best practice guides have been written for our key areas. For example for our Outsourced sites in Europe, Fire Safety best practice guides are used to encourage businesses to internally review their procedures against these suggestions, with the aim of driving sustainable change.

The scale, complexity and seasonality of our supply base of primary growers and farmers, means that specific independent audits are not always possible. The new Human Rights Checklist is completed during site visits by trained staff and this information will be reviewed by the ethical team.



SMETA the Sedex Members Ethical Trade Audit

COLLABORATION

We're committed to working collaboratively to help increase our effectiveness in tackling modern slavery. We're active members of Sedex and FNET (Food Network on Ethical Trade) and play an active part in other collaborative working groups across the industry and more widely. The Company acknowledges that the most powerful means of driving sustainable change within global food supply chains is through collaboration and the collective leverage of the food industry as a whole.



The company is a member of the Sedex Stakeholder Forum (SSF), which brings together manufacturers, brands, retailers, NGO's, auditing bodies and industry experts to discuss challenges in ethical trade and responsible sourcing and solve these problems collaboratively.



The Association Of Labour Provider not for profit organisation promotes responsible recruitment .



The Compleat Food Group is a proud member of The Food Network for Ethical Trade (FNET) which has been established to improve human rights in global food supply chains through a common approach to managing ethical trade. It aims to support suppliers to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and build a forum for sharing issues and challenges and, in the longer-term, to support the food industry to focus on promoting human rights in global food supply chains. This year the company is a member of the Raw Materials working group and has recently joined the new Agents group.



The Company including the UK manufacturing sites are business partners of Stronger Together, a multi stakeholder initiative aiming to reduce modern slavery, particularly hidden forced labour, labour trafficking and other third party exploitation of workers. As business partners we provide evidence to publicly demonstrate the business's commitment to tackling hidden labour exploitation.

TARGETS

We have developed a set of KPI measures which will effectively measure our processes used to tackle modern slavery within our supply chains.

UK KPIS

Target Against Achievement

Modern Slavery Training %	100% Via Inductions
Suppliers on Sedex or completed company SAQ %	95.3%
Labour provider audits completed to schedule %	100%
Worker interviews for agency number biannual 10% of daily requirement	100%
Improvement in Stronger Together Business Partner Reporting Tool score	Increase by 6% - 56%

OUTSOURCED KPIS

Target Against Achievement

Sites on Sedex or completed company SAQ % - 100%	96.4%
Grievance Mechanism in place - 100%	83%
Where labour providers are used auditing in place	100%



2023/24 OBJECTIVES

We aim to be transparent as a business in the challenges that Modern Day Slavery and Human Rights violations present. As such we have identified opportunities within our own business and our supply chains where we feel further progress can be made. These objectives help us to focus on key areas of risk where change can be most impactful.

- Weighting the data for UK and outsourced to ensure that our Risk Assessment is truly reflective and highlights specific areas to target within our supply chain.
- Ethical Risk Assessment to be reviewed annually to illustrate suppliers human rights progress
- Training Video on Modern Slavery Awareness For Managers to be implemented in the induction for all Line Leaders , Managers and HR on the new Compleat Learning system
- Biannual personnel details audit of whole payroll %
- Improvement in Stronger Together Business Partner Reporting Tool score
- Identify partners to work with who are involved in helping victims of Modern Slavery





MAKING FOOD TO FEEL GOOD

As a business our mission is to create great quality, tasty and affordable food, that people love to eat.

And we believe that this should be done in a way that delivers a positive impact on the world and maximises the social, economic, and environmental well-being of the communities we are part of.

We strongly believe that the objectives set out in this years Modern Day Slavery Statement plays an integral part in demonstrating these company values.

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