

**LUITEN FOOD**

BEEF LAMB GAME POULTRY SEAFOOD VEGETARIAN

**THOMAS FOODS**  
INTERNATIONAL

AUSTRALIA | EUROPE | UK | CHINA | USA | JAPAN



# Modern Slavery Report 2024



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# Message from the board

Luiten Food is a family company based on honesty and trust as its main corporate values. Upholding those values only works if we can guarantee that our whole supply chain does the same. Therefore, we have enshrined ethical and socially responsible business practices at the heart of our business policy and Code of Conduct.

While our own operations are managed by a highly localized team, our supply chain spans the globe—from Norwegian salmon to Argentine beef. We are fully committed to identifying, monitoring, and addressing the risks of modern slavery, ensuring that our supply chain and operations remain free from exploitation, discrimination, bullying, harassment, and marginalization.

We strive to uphold human rights in accordance with the United Nations (UN) Universal Declaration of Human Rights, the fundamental labor standards established by the International Labour Organization (ILO), and relevant ILO Conventions. We are dedicated to ensuring fair and safe working conditions, environmental compliance, and ethical business practices. In line with the United Kingdom's Modern Slavery Act of 2015 and the Dutch "Wet zorgplicht kinderarbeid" (Child Labour Due Diligence Act), we define modern slavery as encompassing human trafficking, slavery, servitude, forced labor, debt bondage, forced marriage, and child labor.

With an increasing share of our supply coming from South America and the fishing industry, we recognize the need to enhance our supplier due diligence efforts to reflect these dynamics. It is imperative that no individual is ever coerced into exploitative conditions as a result of our business decisions.

By publishing this statement, we affirm that we have conducted thorough due diligence on our own operations as well as further down our supply chain. While we have found no evidence of modern slavery within our operations, we remain committed to continuously strengthening our processes to ensure earlier detection and a more robust system for identifying and mitigating risks.



Lennert Luiten—Managing director

# Our Company

## The History

Luiten Food has been active in the trade of game and poultry since 1938. In its current form, the company has grown into one of the biggest European players in the import of beef, lamb, game, poultry, Iberico, fish & seafood. Luiten Food is proud to be the supplier of various companies active in food service, food processing, wholesale, catering, retail, and specialty stores.

The Luiten Food team has been working together for years and attaches great importance to personal contact with its customers and suppliers. Therefore, loyalty and trust are among the key principles. This ensures high-quality products and a good relationship with customers.

Luiten Food is a modern and professional company. Outstanding quality control and service are our main priorities. The customer can be assured that we will do everything in our power to tailor a custom solution for every request. We try to find a solution for every technological issue and are happy to take on any challenge for product and chain optimization or innovation. Service and flexibility are of paramount importance at Luiten Food.

Luiten Food recognizes the importance of corporate social responsibility. Based on a sense of social commitment and a clear vision, we are constantly looking for the perfect balance between social, environmental, and economic interests. By doing this, we do everything in our power to take care of people and the environment, in the short-, but also in the long term.



# Our Structure

**Luiten Food Beheer B.V.**

**Luiten Food Import  
B.V.**

**Luiten Food B.V.**

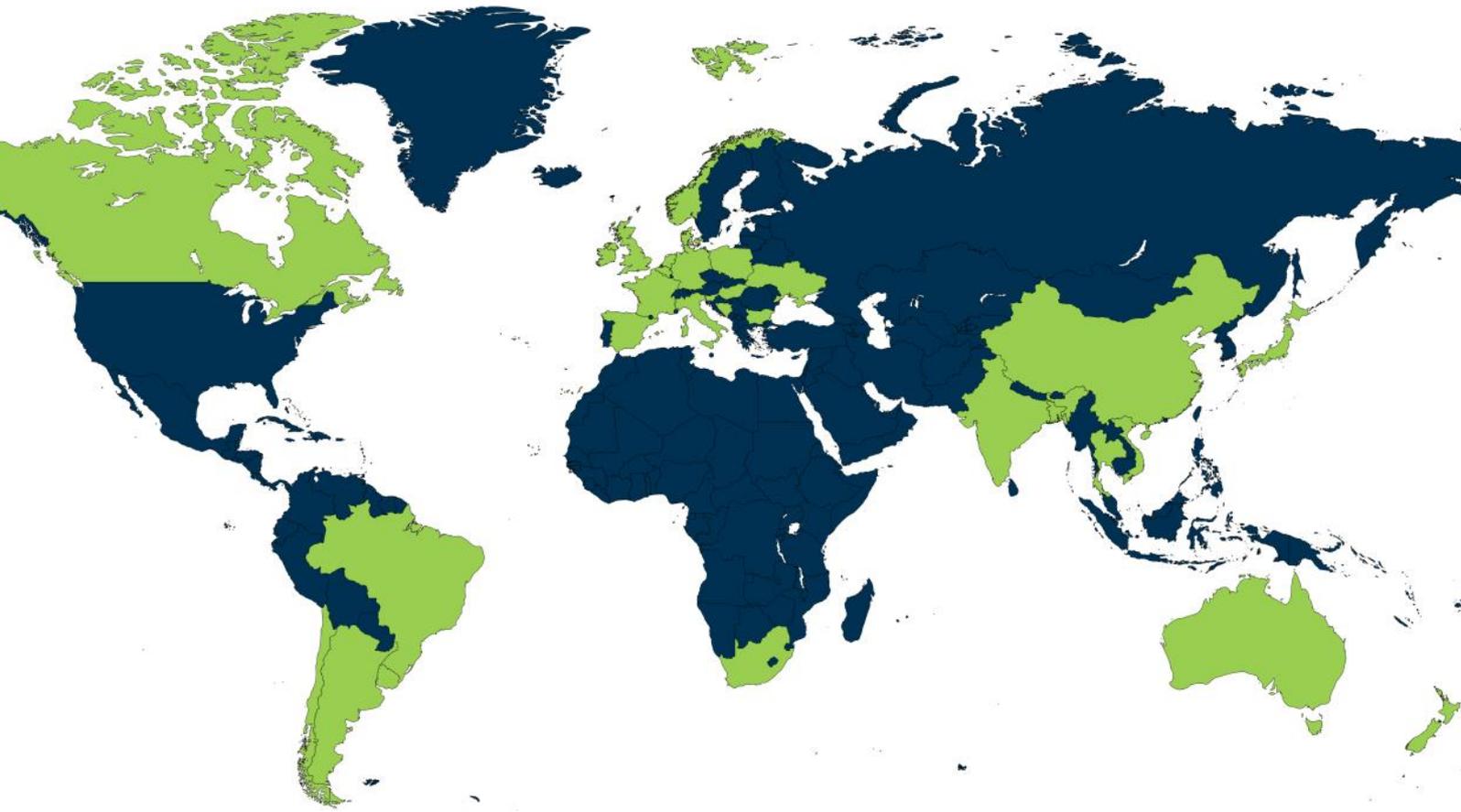
**Luiten Food Ltd.**

The reporting company for this modern slavery statement is Luiten Food Beheer B.V. The reporting company is a holding company encompassing all activities in the European Union and the United Kingdom. The activities in the United Kingdom have been incorporated into the Modern Slavery statement of Thomas Foods International Consolidated Pty. Ltd. due to nature of the operations in the UK. This statement thus includes all activities of the Luiten Food group minus the activities in the UK.

The reporting period of this statement is linked to the financial reporting period of Luiten Food Beheer B.V. The period runs from the 1st of January 2024 until the 31st of December 2024. This report fulfils the requirements of the UK Modern Slavery Act of 2015.



# Our footprint



Our supply chain sources products from various regions worldwide, with shipments directed to our warehouses in the EU and UK. We primarily source our beef from Oceania, South America, and Europe; poultry from Europe, South America, and Thailand; and seafood from India, Southeast Asia, and Europe. A general depiction of our supply chain is visualized above.

In 2024, Luiten Food has created a Code of Conduct which is an extension of its main business policy. Our suppliers are asked to sign this document which includes upholding internationally recognized modern slavery practices. In this way, both Luiten Food and its suppliers can be held responsible for possible malpractices regarding modern slavery and forced labor.

# Operational Risk Assessment

## **Internal Labour & Labour Hire**

The internal risk of modern slavery at Luiten Food is limited. All personnel on the payroll is hired in compliance with Dutch labour laws, which are classified as low risk on the modern slavery index. The staff who are hired via employment agencies must also be employed in accordance with Dutch labour law. In addition, Luiten Food has built long term relationships with its employment partners and requires them to adhere to the relevant certifications regarding payment practices, contractual terms and housing.

All staff, whether on payroll or hired via an employment agencies are provided the opportunity to report modern slavery incidents and complaints. These complaints are handled confidentially and, if deemed necessary by the employee, via an external confidant.

## **Livestock & Meat Processing**

The modern slavery risk within the livestock industry remains high worldwide<sup>1</sup>. While regional differences exist, the prevalence of exploitation of production workers is high across all geographies. Luiten Food undertakes a yearly risk assessment which includes the risk of modern slavery. Most of our meat suppliers are deemed to have a low risk of modern slavery. The suppliers which are deemed to be higher risk, have recently been visited by Luiten Food staff. Furthermore, with most suppliers we have a long-standing partnership which increases trust and lowers the likelihood of occurrences of modern slavery.

## **Fishing**

The seafood products that we buy have a high risk of modern slavery due to the sourcing locations and difficult auditability of producers at sea<sup>1</sup>. While most of our fishery suppliers have SMETA/BSCI/ASC/MSC reports or certifications, the ones that do not are still deemed high risk suppliers. Although no cases of non-compliance have been found, it is still important to improve the due diligence on these suppliers in the fishing industry.

## **Other products and services**

Additional processing services, distribution, and packaging suppliers are all based in the European Union. Most suppliers of these types are based in the Netherlands, Belgium and Germany. These companies have a low risk of modern slavery according to the modern slavery index<sup>1</sup>. In 2025 and 2026 Luiten Food strives to analyse the risk of the Tier 2 suppliers of the distributors and processors. These products sometimes originate from high risk areas where modern slavery is more prevalent. This Tier 2 analysis will also include the international shipping used by our suppliers to bring the product to us.

## **Result**

Luiten Food has not found any cases of modern slavery or forced labour in its risk assessment nor its whistleblower channel. As a result, Luiten Food has not identified any circumstances where remediation has been required during the reporting period.

<sup>1</sup> Walk Free (2024) The Global Slavery Index. [www.walkfree.org/global-slavery-index/map](http://www.walkfree.org/global-slavery-index/map)

# Our Actions

## Structure

By integrating the plan, do, check, act cycle Luiten Food ensures continuous improvement. Furthermore, the actions are brought in line with the Forward Strategy of Thomas Foods International to allow for better cooperation and coordination. The actions below show the highlights from 2024 as well as some of the actions to be completed with a relation to modern slavery.

## Policy (Plan)

<b>Code of Conduct implementation (ongoing)</b>	<b>Whistleblower policy</b>	<b>Purchasing policy</b>
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## Practice (Do)

<b>Employment agency verification</b>	<b>Safe Working Conditions</b>	<b>Approved Supplier Program</b>
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## Audit (Check)

<b>Triennial Supplier Survey</b>	<b>Sustainability Platform</b>	<b>TFI Modern Slavery self-audit (updated assessment)</b>
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## Review (Respond)

<b>Luiten Food board annual review</b>	<b>Identify possible corrective &amp; preventative actions</b>	<b>Implement legislative updates (continuous)</b>
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<b>Ongoing / Planned</b>	<b>Implemented</b>
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01-04-2025