



Freshtime UK Ltd Slavery and Human Trafficking Statement

(Fiscal Year 2015/16)

This is a statement of compliance for Freshtime UK Ltd under section 54 “Transparency in Supply Chains” of the Modern Slavery Act (2015). Modern slavery is a crime resulting in an abhorrent abuse of human rights. The term ‘modern slavery’ is used to encapsulate the crimes of slavery, servitude, forced or compulsory labour and human trafficking. We are striving to combat modern slavery within our organisation and supply chains. The purpose of this slavery and human trafficking statement is to show what we have done in the last financial year and what we are doing going forward.

Freshtime UK Ltd are fully aware of our responsibilities under the Modern Slavery Act (2015). The eligibility criteria defined in both section 54(2)(a) and section 54(2)(b) apply to Freshtime UK Ltd for the financial year 2015/2016.

This statement confirms compliance with section 54(4)(a)(i) and 54(4)(a)(ii) Section 54(4)(b) is therefore redundant.

Section 54(5)(a)

Freshtime UK Ltd manufacture a range of prepared foods for UK retailers. Global supply chains are used to procure raw materials and packaging. The company has a Board of Directors and Senior Officers responsible for policy and practice. Resource is available for ensuring compliance with the Act.

Section 54(5)(b)

Freshtime UK Ltd policies are intended to prevent the possibility of slavery and human trafficking occurring within our business. Key areas are addressed in the “Ethical Trading and Corporate Social Responsibility Policy”, the “Policy on Preventing Hidden Labour Exploitation”, and the “Working with Agencies Policy”.

Section 54(5)(c)

Freshtime UK Ltd 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.

We are AB members of the Social and Ethical Data Exchange (SEDEX) – a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains. Our suppliers are required to share their due diligence data with us through the SEDEX platform. Freshtime reserve the right to carry out audits and inspections of practices within our global supply chain.

We have systems in place to:

- Identify and assess potential risk areas in our business and supply chains;
- Mitigate the risk of modern slavery occurring in our business and supply chains;
- Monitor potential risk areas in our business and supply chains; and
- Encourage and protect whistleblowers.

Section 54(5)(d)

We have a zero tolerance policy towards modern slavery. To mitigate the risk of slavery or human trafficking occurring within the business of Freshtime UK Ltd, we have commissioned external third party audits measuring compliance with the Ethical Trade Initiative Base Code – an internationally recognised code of practice founded on the conventions of the International Labour Organisation (ILO). The 2015 audit reported very favourably.

We continue to risk assess the practices within our supply chain and request similar third party audit activity and reports where there is a high risk of slavery and human trafficking taking place.

Section 54(5)(e)

Performance indicators have been developed in consultation with our key customers. The area of reporting and measuring will continue to evolve as our understanding of the risks develop. Current reporting is centred on audit results and supply chain visibility.

Section 54(5)(f)

Training of staff has been ongoing through 2015 and will continue. Appropriate bodies such as the GLA, ALP and industry bodies with specific knowledge will be used for training of key personnel. All employees have received training regarding modern slavery and human exploitation – either at induction or as part of a planned programme.

This statement is approved by the Board of Directors.

Signed: _____



Mark Newton (Managing Director)

Date: 14TH JUNE 2016