



## **Freshtime UK Ltd Slavery and Human Trafficking Statement**

**(Fiscal Year 2016/17)**

*This is a statement of compliance for Freshtime UK Ltd under section 54 “Transparency in Supply Chains” of the Modern Slavery Act (2015).*

*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 2016/2017.*

*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 Policy”, the “Policy on Preventing Hidden Labour Exploitation”, the “Human Rights Policy” 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 Supplier 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 are member of the Food Network for Ethical Trade (FNET) – a supplier led collaboration aiming to improve supply chain risk assessment through sharing of resources and development of best practice ways of working.

*Section 54.5.d*

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 2017 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.

A number of suppliers identified as of interest were visited by Freshtime Ethical Trade team during the reporting period.

Labour Providers used by our manufacturing site are audited on a regular basis with an aim to improve performance and understanding of the risks in the industry.

*Section 54.5.f*

Training of staff has been ongoing through the reporting period and will continue. Appropriate bodies such as the GLAA, ALP, the Stronger Together Initiative and other industry bodies and NGO's with specific knowledge are 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: \_\_\_\_\_



Steve Evans (Managing Director)

Date:

11/10/2017