



Freshtime UK Ltd Slavery and Human Trafficking Statement

(Fiscal Year 2017-2018)

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 period ending 28 December 2018

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 – Organisation Structure and Supply Chain

Freshtime UK Ltd manufacture a range of prepared foods for UK retailers from our site in Boston, Lincolnshire.

Global supply chains are used to procure raw materials and packaging. The company has a Board of Directors and a Senior Management Team responsible for policy and practice. Resource is available for ensuring compliance with the Act.

Section 54.5.b - Policies

Freshtime UK Ltd policies are intended to reduce the risk of slavery and human trafficking occurring within our business and supply chain.

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 – Due Diligence Processes

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 members of the Food Network for Ethical Trade (FNET) – a supplier led collaboration of food manufacturers and retailers with a mission to improve human rights in global food supply chains through a common approach to managing ethical trade.

Section 54.5.d – Risk Assessment

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).

We risk assess our raw material supply chain using a number of resources including the FNET risk assessment tool and prioritise our activities based on the results. Mitigation activity includes requiring third party audits of suppliers, site visits from Freshtime Ethical Trade Team and other capacity building activity.

Section 54.5.e - Effectiveness

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

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.

Operational managers and team leaders who have regular contact with the workforce have received specific training on identifying potential victims of exploitation.

This statement was approved by the Board of Directors on the 17th January 2019.

Signed:



Steve Evans (Managing Director)

Date:

17/02/19