

## 1. Our structure, business, and supply chains

Fullers Foods International is one of the largest suppliers of frozen foods to the UK market, specialising in the development and procurement of retail ready to cook and ready to eat products across frozen, chilled and ambient categories. Supplying more than 1,200 products including potatoes, vegetables, fruit, poultry, prawns, breads, morning goods, cookies, ice, ice cream, smoothies, ready meals, party food, meat free, organic, free from and vegan products.

Fullers Foods International headquarters is based in Leeds in the UK and has approximately 70 employees. We are an office-based company made up of development, technical, commercial, accounts, and supply chain departments. We have recruited additional resource to support key departments in the business to meet with increasing demand and enabling more effective compliance for our customers. In November 2022 the company was acquired by the existing management team lead by our CEO and backed by American family investors. We've also enhanced our senior management team numbers and defined responsibilities for our business operations. We consider the modern slavery risk of the office to be extremely low.

We work with approximately 110 supplier partners which are located in the UK, ROI, Eastern and Western Europe, South America, Africa and Asia. Finished packaged goods are supplied by our partners and distributed through assigned cold store and distribution networks. The majority is sold to the end user through high street retailers in the UK and Eire, although we do supply into the food service industry, a small volume of products business to business, plus Fullers brand and tertiary branded lines into the retail and food service sectors.

We acknowledge that brand integrity of our customers products is a primary requirement which includes our responsibility and commitment to Corporate and Social Responsibility. This publication is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of Fullers Foods International. Our efforts against slavery and human trafficking complement our broader ethical policy based on the ETI Base Code and ILO standards.

In order to support the Environmental and Social Governance (ESG) Manager, a new role was created to focus on driving social compliance in the supply chain and a colleague was appointed in October 2022. They are responsible for all aspects of compliance to ethical standards, SEDEX data management, new site on-boarding and site risk monitoring. Our strategy and any decisions jointly made by the ESG Manager, Technical Director and signed off by the CEO.

## 2. Policies and contractual controls

### Our employees

Fullers Foods International are committed to human rights and as such have policies in line to protect colleagues. We require all staff working at the head office to follow the staff handbook regarding our whistleblowing procedure. Our new colleague induction defines modern slavery, what the risks are and why they exist. In addition, key colleagues who are most in contact with our supplier partners have completed modern slavery awareness training. In order to strengthen governance, work has started on building a business management system covering human rights, environmental and health and safety aligning business practices with sustainable supply chain relationships and mitigating known human rights risks. Currently all policies and the handbook are accessible in hard copy format and electronically to colleagues. All employees are made aware of the relevant policies during their induction and any updates are formally issued internally through face-to-face training.

### Supplier partners

We expect all our supplier partners to comply with the Ethical and Labour Standards policy and to take responsibility for human rights, not only within their factories, but within their extended supply chains. Our policy covers areas such as worker engagement, grievances, whistleblowing, audit requirements and human rights commitments, including in scope UK sites to publish a modern slavery statement. These are the minimum requirements set out by Fullers Foods. This is distributed electronically at the time of business confirmation and acceptance is recorded with each new version. We rely on sites to maintain open and transparent communication regarding audit bookings, completion, non-compliances and learnings. The most severe issues identified during an ethical audit are required to be highlighted within 48 hours and business will

be placed on hold until effective corrective actions are implemented. Through site visits we are establishing the response plans and mechanisms in place if a slavery incident is suspected or identified, and we are monitoring any emerging trends in labour provision and worker movements.

### 3. Assessment of modern slavery risk within our supply chain

We are a BRCGS Agents and Brokers accredited supplier and are AB members of the Supplier Ethical Data Exchange (SEDEX). We use the platform risk assessment to understand modern slavery, as well as broader human rights risks at supplier site level. We are a member of the FNET (Food Network for Ethical Trade) and as such we are committed to engaging with this group to understand human rights indicators, identify common challenges, industry concerns and create solutions. We continue to participate in regular retailer conferences and disseminate outcomes, resources or projects to our supply base.

Our overall ethical risk assessment uses the following data set to generate an outcome for each supplier partner based on the following:

- Sedex SAQ score
- Sedex RADAR
- location of factory (country)
- size of factory
- commercial value to Fullers
- product type
- previous ethical audit score
- engagement with Fullers Foods

Outcomes are low (green), medium (amber) or high (red) risk enabling easy identification, reporting and consistency in terminology with retail customers. Based on this information as well as the knowledge from internal teams, we have identified seasonal supply chains in Asia, in particular Vietnam, Thailand and China as being high risk. In addition, all year-round supply chains in Europe and the UK as being at an increasing risk during this reporting period (due to labour standards risks). The outcomes and grading of audits are communicated to sites alongside their risk rating. Our highest risk supplier sites make up 11% of our total supply base currently. We have had no reported cases of forced labour or child labour raised about our own operations in the reporting year. We continue to develop our risk assessment process and review the needs of the business and customer requirements across all sectors.

It is important to us to collaborate with various stakeholders and be informed through multiple data sets. We attended the Modern Slavery Intelligence Network conference in June 2022 which aims to highlight new challenges that have evolved the landscape of exploitation and how it can disrupt modern slavery and labour exploitation in the food and agricultural industry. To develop our understanding of remediation we have been in contact with a rehabilitation project for survivors of modern slavery building confidence and practical cookery skills. We attended a retailer strategic human rights forum in July covering key supplier and industry updates, progression journeys and customer projects and also facilitated a Fullers Foods human rights update at a tier 1 site with a customer.

### 4. Due diligence procedures

#### Audit and SEDEX

We understand that our biggest exposure to modern slavery is in our product supply chains and in the first instance we use SEDEX for compliance with our policy for tier 1 sites. All sites are expected to comply with our Ethical and Labour Standards Policy. In addition, if the sites are producing for retail own label they must be linked to customers on SEDEX, complete the SAQ in full every 6 months or after a significant change and produce visibility of audit history. 80% of those suppliers have had a SMETA audit in the last two years and we have an 71% compliance rate regarding SAQ management.

Our policy outlines our requirement for open and honest communication; following an audit the corrective action procedure for non-compliances must be committed to. During this reporting period we have had labour challenges arise at supplier sites which have required a collaborative decision regarding corrective action plans and timescales however being engaged and working closely has delivered the appropriate outcome and kept our supply chains resilient. We have also clearly identified trends in audit outcomes and used a

cross-department approach to engage and drive for resolution. SEDEX RADAR and analytics are both tools that we use routinely for due diligence.

#### Remediation and grievance mechanisms

We recognise the importance of locally developed grievance procedures and procedures for remedying human rights issues which are raised by workers or external third parties about supply chains. Grievance procedures should follow the United Nations Guiding Principles “effectiveness criteria” for non-judicial grievance mechanisms. Our colleague handbook outlines the mechanisms in place for grievances and whistleblowing, with details available at all times on the health and safety noticeboard for colleagues and visitors. All supplier partners are required to have a whistleblowing policy and grievance procedure in place with supporting resources and information visibly displayed.

#### Toolkits and resources

We use the Responsible Recruitment Toolkit and the Stronger Together Good Practice Implementation Checklist to assess our status and monitor progress. We complete an annual ESG assessment on Authenticate which highlights our current status and progression on a shared portal which is available to retail customers. We are also due to complete our first ESG assessment with EcoVadis which will support any priority actions across labour and human rights indicators.

#### 5. Effectiveness / Key Performance Indicators

With the actions we implement within the business and supply chain we monitor a range of indicators internally to understand effectiveness and accuracy. This data is recorded and includes monitoring and evaluation of policy development and implementation, colleague training, SEDEX related compliance and safeguarding mechanisms. Our relationships with supplier partners is key and as our expectations for labour standards is increasing in value, commitment to due diligence and governance are being recorded. This will be monitored through a combination of quantitative data and in person visits.

#### 6. Training

A key part of our slavery and human trafficking strategy is to promote cultural change through training. This reporting period we have completed the following:

- [Stronger Together Introduction to Tackling Modern Slavery in UK Businesses](#) in May 2022
- Responsible Recruitment Toolkit ([RRT](#)) [Labour Supply Chain Due Diligence](#) in Oct 2022 by ESG Manager
- [RRT Fair and Equal Opportunity and Treatment](#) in Nov 2022 by ESG Manager
- SMETA for suppliers workshop in Nov by ESG Manager
- [RRT Eliminating Worker Paid Recruitment Fees](#) in March 2023 by ESG Manager
- [Ethical Trade Initiative Human Rights Essentials](#) in May and June by the ESG team

We have identified champions within the business that are responsible for raising awareness and mitigating risks of modern slavery, are a point of contact for any queries and will be part of our response plan. Our supply chain partners must complete with any retailer specific training requirements, and also we recommend a nominated colleague at the site undertakes the SEDEX e-learning modules. We share links to any learning, training or resources with supplier partners across a number of topics such as labour provider due diligence, recruitment good practices, retailer forums and regional conferences.

Signed



CEO Kevin Smith 11.09.23