



Modern Slavery Statement

Our Commitment to Tackling Modern Slavery

Sofina Foods Limited is committed to respecting the Human Rights of all employees and workers within its supply chain and to tackling all forms of hidden labour exploitation, including slavery and human trafficking. We have procedures in place to help identify and eradicate these practices within our business and to reduce risks in our supply chain.

We respect the Human Rights of all employees and workers within our supply chain. To mitigate the risk of labour exploitation within Sofina Foods Limited and throughout our supply chain, our ethical practices and processes are focussed on Compliance to the Ethical Trading Initiative's internationally recognised code of labour practices. This sets minimum requirements covering the following areas:

1. Employment is freely chosen
2. Freedom of association
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

This statement is published by Sofina Foods Limited, in accordance with section 52(1) of the Modern Slavery Act 2015. It sets out the steps, actions and activities during the Financial Year 1st April 2021 to 31st March 2022.

Our Business and Supply Chains

Supplier Standards - undertakes due diligence when taking on new suppliers and reviews its existing suppliers. We require all our suppliers to operate to our 'Terms and Conditions of Purchase', which includes a specific requirement to operate according to recognised ethical business standards as defined within the Ethical Trade Initiative Base Code and in ensuring the Human Rights of those engaged in the supply chain.

Supply Chain Audit - We monitor and review the supply chain risk routinely and we have procedures in place to escalate high risk issues where necessary. We have implemented a due diligence approach to identifying risk and prioritising activity within our supply chains and where we find issues we will work in collaboration with our suppliers, where possible, to improve standards within our supply chains.

Due Diligence and Audits of Our Suppliers and Supply Chain

We are members of the Supplier Ethical Data Exchange (Sedex). So that we can conduct effective risk analysis of our supply chains, all our suppliers are required to register themselves onto the Sedex system and to allow us to see their audit results and self-assessment details.



Our People - Due Diligence

Identification Checking - When recruiting we follow good practice approaches to identification, verification and legitimacy of right to work within the UK.

Agency Audit - All of our agency suppliers are subject to audit and each are required to maintain GLA licensing. We recognise that temporary workers are a particular risk in respect of modern slavery and we will continue to work closely with our agency partners to mitigate the risk of potential labour exploitation.

Employee Interviews - A representative sample of our workforce are interviewed on a quarterly basis, ensuring that their treatment is in line with the Ethical Trading Initiative Code, and that evidence is sought that they are not the subject of modern slavery or human trafficking.

Whistleblowing - We operate a whistleblowing policy which is designed to make it easy for employees and workers to make disclosures without fear of retaliation. It is communicated to all employees and agency workers via their induction, Company handbook and on posters throughout all our locations. We encourage our colleagues to report any concerns they may have regarding any situation which causes them concern or any specific circumstance that may give rise to an enhanced risk of slavery or human trafficking.

Independency of Colleagues - Checks are undertaken throughout the year within our own business operations to identify any areas of concern associated with shared addresses or bank accounts.

Our Anti-Slavery Training

HR Team Training - Through the 'Stronger Together' programme, our HR teams and agency providers have received awareness training on the signs and risks associated with Modern Slavery and Hidden Labour exploitation.

Key People Awareness - This year will see the wider roll-out of 'Stronger Together' training for First Line Leaders within the business through our Management Essentials programme and Apprenticeship modules.

Wider Communication – Through the appointment of an Ethical & Compliance Advisor, this year will see a wider communications programme in relation to Modern Slavery, including support for the annual Anti-Slavery Day in October and further policy development in relation to Hidden Labour exploitation.

This statement has been approved by the organisation's Board of Directors.

Steve Ellis
Director

12 November 2021

(originally issued 1 January 2020 on behalf of Eight Fifty Food Group Limited, now Sofina Foods Limited)