



## **MODERN SLAVERY POLICY**

### **STATEMENT**

This policy applies to all persons working for Global Foods Limited (The Company), or on our behalf in any capacity, including employees, directors, agency workers, volunteers, contractors and suppliers. Global Foods Limited strictly prohibits the use of modern slavery and human trafficking in its operations and supply chains. We have and will continue to commit, implement systems, and controls, aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

### **COMMITMENT**

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Global Foods Limited expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of

writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

- Consistent with our risk-based approach we may require:
  - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
  - As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
  - If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

## **ACTION**

- Designate managers to receive relevant training in relation to this policy and to have responsibility for developing and operating company procedures relevant to this issue.
- Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and to look for signs of slavery.
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
- Provide information on tackling "Hidden Labour Exploitation" to our workforce through a variety of formats such as workplace posters, induction training, employee handbooks etc.
- Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.
- Require labour providers and other organisations in the supply chain to adopt policies and procedures consistent with the above.

The Covid-19 crisis has highlighted areas in which workers may be more vulnerable to risks of modern slavery due to COVID-19, outlined are the following mitigation measures:

- Health and safety: The Company has implemented relevant local and national government policies throughout the supply chain, including social distancing measures and paying statutory sick pay.
- Supporting suppliers: To avoid workers being unpaid for work completed, The Company engages with suppliers, and pays for orders already in production if possible.

- Grievance procedures: Workers are still able to access grievance procedures and The Company ensures that new or adapted procedures are made available if necessary.

## **APPROVAL**

This Policy has been approved by the Board of Directors.

Nina Ahmad-Vellani

Global Foods Limited

April 2020