



# **Fullers Foods International PLC**

## **Modern Slavery Statement**

### **Effective May 2019.**

#### **1. Business overview.**

Fullers Foods International PLC specialises in the development and procurement of retail packed frozen, chilled and ambient goods. These include formed potato products, chipped potatoes, vegetables, fruit, poultry, meat, ready meals and fish.

We acknowledge that brand integrity of our customers products is a primary requirement which includes our responsibility and commitment to Corporate and Social Responsibility (CSR). With that in mind, we have developed and published our annual Modern Slavery Statement with due consideration to section 54 of the Modern Slavery Act 2015. We explain how slavery and human trafficking can affect our business, and the steps we are taking to control and eliminate it. This publication is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of Fullers Foods. Our efforts against slavery and human trafficking complement our broader CSR Policy and our adoption of the Ethical Trading Initiative.

Fullers Foods International headquarters is based in Leeds in the UK and employ approximately 48 operatives. We manage approximately 110 supplier partners which are located in the UK, Eastern & Western Europe, North America, and Asia. Finished packaged goods are supplied by our partners and distributed through Fullers Foods assigned coldstore & distribution network, and mainly sold to the end user through high street retailers in the UK and Eire, although we do supply into the food service industry.

We are AB members of the Supplier Ethical Data Exchange (SEDEX), and all our suppliers are registered on the SEDEX platform.

## **2. Risk Assessment**

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We have used the SEDEX risk assessment tool to enable us to identify the risk of modern slavery in the supply chain. This includes assessment of the following:

- SAQ risk rating
- Inherent risk rating
- Previous audit performance

The combined overall risk rating will be categorized as low, medium or high risk, and enables us to easily identify the sites on which we need to focus.

During the past year ending 30<sup>th</sup> April 2019, we took the following steps to further develop our supplier engagement with regard to minimizing the risk of modern slavery in our supply chain:

- **Relationships:** Strengthening our supplier engagement process
- **Knowledge:** Improving our knowledge base by engaging with industry bodies and customers ethical departments, sharing best practice and increasing skill sets and knowledge
- **Measurable change:** Developing verifiable KPIs to measure progress
- **Supplier collaboration:** Encouraging suppliers to collaborate and address slavery and human trafficking issues
- **Incentivisation:** Developing mechanisms to incentivise suppliers to address slavery and human trafficking and improve labour standards
- **Accountability:** Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking.

## **3. Due diligence procedures**

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We understand that our biggest exposure to Modern Slavery is in our product supply chains. We have undertaken activity over the last 5 years to minimise the risk of Modern Slavery. Within these areas, new suppliers and sites are subject to due diligence checks in the form of ethical & compliance audits. These audits assess compliance with the ETI initiative and are amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

Any site that fails its ethical audit or does not adequately close out non-conformances to a satisfactory level, or in a timely manner will be delisted, and their approved supply status withdrawn.

#### **4. Identifying, assessing, and managing risk**

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We set out to identify the extent of any slavery and human trafficking in our supply chains by:

- Engaging and facilitating third party auditors to conduct social audits at supplier sites in line with retailer requirements
- Collaborating with our suppliers to develop an improvement plan to address new and previously identified slavery and human trafficking issues

#### **5. Key performance indicators**

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In order to assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

- Ethical audit report non-conformances
- Number of slavery incidents reported in the supply chain

#### **6. Training**

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A key part of our slavery and human trafficking strategy is to promote cultural change through training. Training undertaken last year, and planned for this year includes:

- Delivered CSR training to all members of the Fullers Foods Technical Team
- Fullers Foods have a dedicated member of staff trained as an ethical auditor and in human resources
- Stronger Together will deliver Modern Slavery training to Fullers Foods Technical Managers
- Fullers will develop and deliver a Webinar on ethical trading practices including modern slavery to our suppliers to update them on retailer requirements regarding ethical management.



Jason Fuller  
CEO – Fullers Foods International.