



## **Fullers Foods International PLC – Modern Slavery Statement Effective May 2020**

### **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 International PLC. Our efforts against slavery and human trafficking complement our broader CSR Policy and our adoption of the Ethical Trading Initiative (ETI).

Fullers Foods International PLC headquarters is based in Leeds in the UK and employ approximately 56 operatives. There have been no structure changes since the last statement was published.

We manage approximately 120 supplier partners which are located in the UK, Eastern & Western Europe, South America, Africa and Asia. Finished packaged goods are supplied by our partners and distributed through Fullers Foods International PLC assigned cold store and distribution networks. These are 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 a BRC Agents and Brokers accredited supplier and are AB members of the Supplier Ethical Data Exchange (SEDEX). All our suppliers are registered on the SEDEX platform.

### **2. Policies in relation to slavery and human trafficking**

Fullers Foods International PLC have developed, with the assistance of FNET (Food Network for Ethical Trade), an Ethical and Labour Standards policy. We are committed to human rights and we expect all our suppliers to take responsibility for human rights, not only within their factories, but within the supply chain. This policy was developed to be in line with the requirements of the ETI base code, the Fundamental Conventions of the International Labour Organisation (ILO), National and International Laws and covers areas such as worker engagement, grievances, ethical audit requirements, commitments.

The policy was communicated internally to all existing suppliers and is given to all new suppliers as part of the onboarding process.

Fullers Foods International PLC also require all staff working at the head office to follow the Code of Conduct for Employees.

### 3. Identifying, assessing, and managing risk

Fullers Foods International PLC have developed their own risk assessment to better identify any risks within the supply chain and to highlight the most salient modern slavery risks. This was created from several factors including but not limited to – SEDEX SAQ score, SEDEX Risk Assessment, location of factory (country), size of factory, commercial value to Fullers Foods International PLC, type of product, previous ethical audit score, inherent risk rating, FNET Risk Assessment.

The combined overall risk rating is categorised as low, medium, or high risk and enables us to easily identify the sites with which we need to focus.

We still use the below methods 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
- Businesses who, for various reasons are now marked as “ceased trading” on the GLAA Public Register of Licensed Gangmasters are communicated to all suppliers
- Sites are asked to do a risk assessment of own operations and an action plan to tackle risks including third party suppliers – security, canteen workers, outsourced cleaning

### 4. Due diligence procedures

We understand that our biggest exposure to Modern Slavery is in our product supply chains. We have undertaken activity over the last 6 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 and compliance audits. These audits assess compliance with the ETI base code and amongst other things, are intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken. Any sites that fail their ethical audit or do not adequately close out non-conformances to a satisfactory level or in a timely manner will be delisted and their approved supply status withdrawn.

Fullers Foods International PLC have joined FNET where we are able to share and receive lessons learned and best practice regarding Modern Slavery and other ethical risks. We are active members of the Co-operative supplier forums where we take the outputs of the forums and disseminate this information to our supplying sites and internal customers within Fullers Foods International PLC.

During the past year ending 30<sup>th</sup> April 2020, we took the following steps to further develop our supplier engagement regarding minimising 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

## 5. Key Performance Indicators

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

- Ethical audit report non-conformances
- Number of slavery incidents reported in the supply chain
- Ensure that 100% of Fullers Foods International PLC technical employees are aware of Modern Slavery Awareness raising; how to spot the signs and how to report it
- All supplying sites will receive ongoing updates and notifications regarding Modern Slavery – including GLAA ceased trading businesses
- Ensure 100% of suppliers have accepted and are abiding to the Fullers Foods International PLC Ethical and Labour Standards Policy

## 6. Training

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:

- Stroger Together delivered the 'Tackling Modern Slavery in the UK and Global Supply Chains' training to all Fullers Foods International PLC Technical Managers including senior management
- Stronger Together will deliver refresher training on Modern Slavery to all members of the Fullers Foods International PLC Technical Team including senior management
- Fullers Foods International PLC have a dedicated member of staff trained as an ethical auditor associate and in human resources. Training is continuing this year to achieve the Ethical Auditor qualification
- Fullers Foods International PLC have developed a webinar on ethical trading practices include modern slavery which will be delivered to new suppliers to update them on retailer requirements regarding ethical management
- Requesting supplying sites to train and have 'site champions' who are responsible for raising awareness, coordinating investigations onsite and delivering training modules internally where required



Jason Fuller  
CEO – Fullers Foods International PLC