



1. Our structure, business, and supply chains

Fullers Foods International PLC headquarters is based in Leeds in the UK and has approximately 65 employees. We are an office-based company made up of several departments including development, technical, commercial, accounts, and supply chain. 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. 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.

Fullers Foods International PLC specialises in the development and procurement of retail packed frozen, chilled and ambient goods. These include ready to cook and ready to eat potatoes, chips, vegetables, ready meals, meat and poultry, seafood, breads, morning goods and desserts, fruit and smoothies, party food and snacking, 'free from' and organic products.

We manage approximately 110 supplier partners which are located in the UK, ROI, Eastern and Western Europe, South America, Africa and Asia. These supplier partners source ingredients and raw materials globally. 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 and a small number in 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. 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 clarify how slavery and human trafficking can affect our business, and the steps we are taking to control and tackle 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 ethical policies based on the ETI Base Code and ILO standards.

Our appointed Ethical Associate is responsible for internal colleagues and main point of contact for external human rights issues within the supply chain. They are responsible for identifying training needs around modern slavery and the scope for the business. Our strategy and any decisions are jointly made by the Ethical Associate, Head of Technical and signed off by the Executive Officer. Our organisational structure lends itself to effective decision making with direct communication to the senior management level and Executive Officer. From September 2021 there will be a newly created role of Environmental, Social and Governance Manager who will take responsibility for modern slavery within the full remit of our ethical business strategy.

2. Policies and contractual controls

Our employees

Fullers Foods International PLC are committed to human rights and as such have policies in line to protect the workforce. We require all staff working at the head office to follow guidance and policies outlined in the Staff Handbook.

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, ethical audit requirements and commitments, including UK sites in scope to publish a modern slavery statement. These are the minimum requirements set out by Fullers Foods.

Process

As we aim to strengthen our framework and consistency of approach, our Ethical and Labour Standards policy is under review, along with the staff handbook and environmental policy. All policies and handbooks are accessible in hard copy format and electronically on the company intranet. All employees are made aware of



the relevant policies during their induction and any updates are formally issued internally through face-to-face training. These are distributed to our supplier partners electronically and acceptance is recorded with each new version. The policy is shared prior to business confirmation alongside a request for acceptance. Any instances of modern slavery or child labour identified during an audit or any other means will result in the business being placed on hold immediately until an appropriate corrective action plan is in place.

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 platforms 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 provide training on current and increasing indicators, common challenges, industry concerns and find solutions regarding modern slavery. 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 sets to generate a risk score for each supplier partner across all human rights matters:

- SEDEX SAQ score
- SEDEX risk assessment
- Location of factory (country)
- Size of factory
- Commercial value to Fullers Foods
- Product type
- Previous audit score
- Inherent information taken from FNET risk data

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 within Europe and the UK have been identified as being at an increasing risk during this reporting period. The results of audits are monitored and impacted status to either the Fullers or retailer risk ratings are communicated by the Ethical Associate. Our highest risk supplier sites make up 8% 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. In the coming year, we plan to develop our business-level risk assessment of modern slavery specifically using a broader range of intelligence from globally recognised data sources. This will help us to identify where we should be prioritising our due diligence activities.

4. Due diligence procedures

Audits 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. We require supplier partners (who deliver own-label retail products) to have completed the SEDEX SAQ in full (including an update every 6 months or after a significant change) and provide us with information about how they are managing modern slavery risks. 78% of those suppliers have had a SMETA audit in the last two years and we have a 96% compliance rate regarding SAQ management.

Our Ethical and Labour Standards Policy outlines the corrective action procedure for non-compliances. If sites are issued with the specific non-conformances explicitly itemised according to their severity and they do not adequately close them out to a satisfactory level or in a timely manner this will result in the business being placed on hold immediately. Next steps are decided between Fullers Foods, the site and the retailer on a case-by-case-basis.



In the future, we plan to work more closely with our supplier partners to resolve any complex and sustained issues where we have insight and best practice to share. We aim to take a more pro-active approach and share communication, fundamentally for our customers, through regular forums, meetings and presentations.

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. We are in the process of improving our own internal systems for raising grievances. All supplier partners are required to have a whistleblowing policy and grievance procedure in place with supporting resources and information visibly displayed.

5. Effectiveness / Key Performance Indicators

Progress against KPIs are stated below -

We use the following tools to track progress internally:

- Development and implementation of policy (100%)
- Number of employees engaged - delivery of training and impact of that training (no training completed in this reporting period)

We use the following tools to track progress externally:

- Number of supplier partners registered on SEDEX (100%) and having completed SAQs (96%)
- Number of supplier partners that have accepted and are abiding to the Fullers Ethical and Labour Standards Policy (100%)
- Number of non-compliances raised in ethical audits identifying modern slavery issues (0)
- Number of modern slavery incidents reported in the supply chain through non-audit channels (0)

We aim to share progress internally against KPIs on a regular basis using resources such as the [Responsible Recruitment Toolkit](#) and the [Stronger Together Good Practice Implementation Checklist](#). This will also enable us to report on progress to our retail customers with more depth and integrity in our data.

6. Training

A key part of our slavery and human trafficking strategy is to promote cultural change through training. Plans for the coming year includes:

- [Stronger Together Introduction to Tackling Modern Slavery in UK Businesses](#) for our Commercial and Development teams
- Stronger Together bespoke refresher training for the Technical and Compliance teams
- [Stronger Together Advanced Tackling Modern Slavery in UK Businesses](#) for the ESG Manager
- Culture training which covers identifying responsible behaviours and creating a positive culture where business practices do not increase the risks of modern slavery

For our supply base we produce an annual presentation to share insights on common non-compliances alongside good examples and key learnings. We can use SEDEX analytics to assess what the rate of completion is on their e-learning pathway and review the standards for SAQ completion. By using trends in non-compliance type, we will be able to directly support sites on addressing them and putting a more effective corrective action plan in place.

Signed (Jason Fuller CEO)

A blue ink handwritten signature, appearing to read 'Jason Fuller', written over a horizontal line.