

1. Our structure, business, and supply chains

Fullers Foods International PLC headquarters is based in Leeds in the UK and has approximately 70 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 ready to cook and ready to eat frozen, chilled and ambient potatoes, chips, vegetables, ready meals, meat, fish, prawn, bread, morning goods and cookies, ice, ice cream, fruit, party foods, meat free, organic and vegan products.

We manage approximately 105 supplier partners which are located in the UK, ROI, Eastern and Western Europe, South America, Africa and Asia. 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, a small volume of products business to business, plus 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.

In September we appointed an Environmental and Social Governance (ESG) Manager, a new role within Fullers responsible for our strategy across sustainability, human rights, ethical trade and governance. They are responsible for the generation and delivery of our ethical trade approach, identifying training needs around modern slavery, is the point of contact for escalating human rights issues within the supply chain and is customer facing providing compliance updates and site risk monitoring. Our strategy and any decisions are jointly made by the ESG Manager, Technical Director and signed off by the Executive Officer. Our organisational structure lends itself to effective decision making with direct communication to the senior leadership team.

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 the staff handbook regarding our whistleblowing procedure. New colleagues are trained on modern slavery awareness during induction and key colleagues who are most in contact with our supplier partners have completed modern slavery in global supply chains training. In the coming year we are planning to develop governance by creating a management system where we are assigning modern slavery champions in line with our human rights policy and providing a regular company briefing pertaining to salient risks and mitigation of these in our communications policy.

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, we are planning to collate all relevant ESG policies and procedures into a management system. Currently 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 Ethical Trade and Labour Standards policy is shared prior to business confirmation alongside a request for acceptance. Any instances of 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 platform 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 solutions forward 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 set to generate an outcome for each supplier partner across all human rights matters:

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

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 in Europe continue to be at increased risk during this reporting period. The results of audits are monitored and any status impact to either the Fullers or retailer risk ratings are communicated by the ESG Manager. Our highest risk supplier sites make up 5% 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. Whilst we have started this process, we are still developing our business-level risk assessment of modern slavery using more targeted questions and areas of focus to increase capacity and improve system capabilities across operational risks, moving away from a risk assessment mostly built on inherent risk and audit outcomes. This will help us to identify where we should be prioritising our due diligence activities.

4. Due diligence procedures

Audit 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. 51% of those suppliers have had a SMETA audit in the last two years and we have an 83% 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 and they do not adequately close out non-compliances to a satisfactory level or in a timely manner this will result in the business being placed on hold. Next steps are decided between Fullers Foods, the site and the retail customer on a case-by-case-basis. During this reporting period we have had labour challenges arise at supplier sites which have required a collaborative decision regarding corrective action plans and timescales, however being engaged and working closely has delivered the appropriate outcome and kept our supply chains resilient. We have also clearly identified trends in audit outcomes and used a cross-department approach to engage and drive for resolution.

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. Our colleague handbook outlines the mechanisms in place for grievances and whistleblowing, with details for whistleblowing currently available electronically and are to be shared on the health and safety noticeboard for colleagues and visitors alike. A worker welfare policy will form part of our new management system. 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

Key Performance Indicator	Y 2020/2021	Y 2021 / 2022
Development and implementation of policy	100%	100%
Colleagues who have completed ST training on modern slavery	0	5x technical / 6x commercial / 6x NPD
Number of supplier partners registered on SEDEX	100%	100%
Number of supplier partners with completed SAQs	96%	83%
Number of supplier partners that have accepted and are abiding to the Fullers Ethical and Labour Standards Policy	100%	53%
Number of non-compliances raised in ethical audits identifying modern slavery issues	0	0
Number of modern slavery incidents reported in the supply chain through non-audit channels	0	0
All UK supplier partners (meeting legal requirement) have published a modern slavery statement	not recorded	80%
Number of times the policy has been accessed	not recorded	issue with reporting
Number of times a grievance mechanism was used	not recorded	0
Number of times a whistleblowing mechanism was used	not recorded	0
Number of supplier partners engaged through awareness raising and training exercises	not recorded	50%
Bi-annual updates with supplier partners on their approaches to tackling modern slavery risks	not recorded	8%

We utilise resources such as the Responsible Recruitment Toolkit and the Stronger Together Good Practice Implementation Checklist to assess and monitor our progress. 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. This reporting period we have completed the following:

- [Stronger Togethers Introduction to Tackling Modern Slavery in UK Businesses](#) for our Commercial team in May and June, and our Development team in January 2021
- Stronger Together bespoke refresher training for the Technical and Compliance teams in May 2022
- [Stronger Togethers Advanced Tackling Modern Slavery in UK Businesses](#) for the ESG Manager in December 2021
- Culture training which covers identifying responsible behaviours and creating a positive culture where business practices do not increase the risks of modern slavery. Completed by the Technical team in November 2021.

We produce an annual presentation to share insights on common non-compliances alongside good examples and key learnings to present to the internal business. 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. We can use SEDEX analytics to assess what the rate of completion is on sites e-learning pathway and review the standards for SAQ completion. We share links to any learning, training or resources with supplier partners across a number of topics such as labour provider due diligence, recruitment good practices, retailer forums and regional conferences.

Signed (Jason Fuller CEO)

