



Modern Slavery Statement

Financial Year 2019-2020

This statement has been issued in accordance with the Modern Slavery Act 2015. This statement demonstrates our commitment to ethical trading, tackling modern slavery and the steps being taken to increase transparency within our supply chain and our own operations

OUR VISION:

Assurance that all workers in our own business and in our global supply chains are protected, respected and free from slavery, abuse and harm.

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INTRODUCTION

The UK Modern Slavery Act 2015 looks to tackle this international atrocity, by making large UK companies accountable for the workers in their supply chains, where modern slavery is often hidden. The Act requires companies to publish an annual report setting out the steps being taken to ensure that trafficked men, women and children are not operating in their supply chains and to give details of any due diligence being conducted to avoid forced, bonded, or slave labour.

Bidfresh Limited is fully committed to ethical working practices, and, as a company, regards inhumane conditions such as slavery, worker exploitation, and human trafficking as completely unacceptable either within our own business or through our supply chains. We understand our responsibilities and have a zero tolerance approach to modern slavery. We recognise that modern slavery, which can take many forms, is a crime, and we strive to act ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

Modern slavery within the food industry may take the form a number of forms for example:

- Engagement of labour agencies who recruit seasonal workers for fruit and vegetable picking on farms, without express obligations concerning ethical recruitment and retention of labourers
- Poor conditions, passport retention and bonded labour in food processing
- Procurement of high risk foods across maritime borders, particularly from emerging economies, such as
 crustaceans, corn, palm oil, poultry, rice, sesame, wheat, sugarcane, cattle, beans, coffee and cocoa beans,
 seafood, nuts and tea, including forced labour risks involved in shipping, and transport of these products

The Coronavirus pandemic has affected businesses across the world and the change in economic conditions is likely to lead to an increase in the risk of modern slavery and exploitation within the supply chains by:

- Increasing vulnerability to slavery due to lockdowns and job losses
- Increased risk to migrant workers
- Reduction of scrutiny and ethical auditing due to travel restrictions

OUR COMMITMENT

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OUR BUSINESS & SUPPLY CHAINS

Bidfresh is a specialist seafood, meat, produce and dairy supplier with a decentralised model of management which encourages the entrepreneurial spirit contained in each of its businesses. Businesses retain their local brand, tone of voice, look, and feel. However, many of the back office functions - including ethical trade and food safety - are centralised.

We currently consist of 12 sites and 17 brands across the UK, supplying to chefs, restaurants and food service. A full list of our businesses and brands can be found on our website, www.bidfresh.co.uk.



Food safety and buying roles are responsible for collecting ethical information from proposed suppliers as well as supporting involvement in supplier projects.



SUPPLY CHAINS

The majority of our tier 1 suppliers are UK-based, which reflects a priority across the group to source fresh, locally and seasonally wherever possible. However we also have a number of important products such as seasonal produce, prawns and squid which come from the EU and overseas.

The supply chain structures within Bidfresh vary depending on the business division. For example, a complicated fish supply chain may involve vessels who engage in transhipment, offload to a freezer or cannery, and then ship overseas to one of our depots; whereas a complicated meat supply chain may include different farms for breeding, rearing, fattening, and abattoirs before being packed and shipped to the UK. In more simple cases, we purchase directly from local farmers or fish markets in the UK. All of these different stages in supply chains may have different human rights issues associated with them.

We have continued the mapping of our supply chains and will continue to do so in the coming financial year.

Examples of Labour Risks Relevant to Bidfresh Supply Chains

Warm Water Shrimp	There have been documented cases of severe exploitation of workers, specifically of migrant workers in the Thai peeling sheds and Bangladeshi shrimp-fry collectors
Frozen, Fresh and Ambient Tuna	Use of transhipment is prevalent in these supply chains. Transhipment has links to potential labour rights abuses as there is a lack of transparency making it difficult to control or even monitor worker welfare on vessels
Peruvian Asparagus	Use of agency labour to support mass production. Majority of the workforce are women who are seen as more vulnerable and more likely to enter and leave the labour market according to the season – leads to unregulated agency work
South American Beef	Cattle ranches exploit slave labour for tasks such as building fences, tending to cattle, applying pesticides etc. The isolation of farms/abattoirs and a shortage of inspectors to uphold the law is what can result in worst-case scenarios.



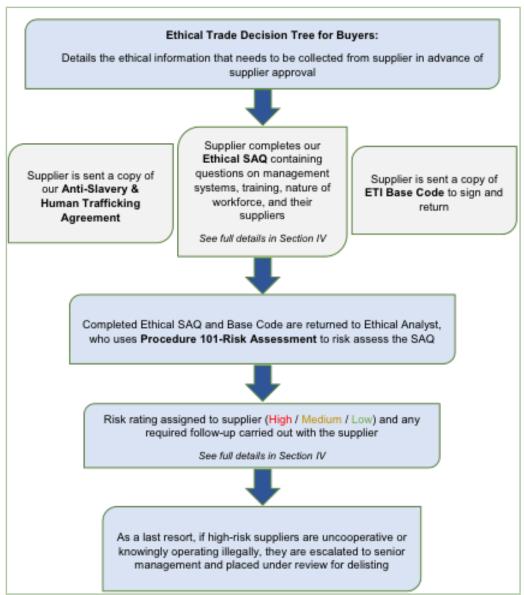
DUE DILIGENCE PROCESS

The Company monitors and evaluates its suppliers based on their commitment to ethical trade and compliance with the ETI Base Code. The due diligence procedure is normally conducted during the approval process for a new supplier, and updated at least on a biennial basis.

During the year all policies, procedures and risk assessments relating to Ethical Trade have been reviewed. Revised records ensure better integration with Technical supplier approval, and improved ease of access to supplier ethical information

All of the Bidfresh sites have our internal Fraud & Ethics Hotline on display, which anyone can contact anonymously at any time. The hotline is for reporting incidents such as suspected fraud and unethical behaviour, bullying, human trafficking, and slavery, either within our business or that of our suppliers. The line is monitored by an anonymous dedicated member of staff who deals with and escalates each issue as appropriate.

Our main ethical due diligence process for suppliers is as follows:





MONITORING & REMEDIAL ACTION

Bidfresh recognises the responsibility that we share with our suppliers to provide remedy to victims of slavery. Successful remediation is not easy to achieve and requires a victim-led, consultative and multi-stakeholder approach. We have developed a policy which is drawn from best practice guidance on remediation and builds on the requirements of ILO Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights to Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the UN Guiding Principles on Business and Human Rights. The policy intends to provide a practical framework for Bidfresh and its suppliers to apply remedy should we encounter victims of slavery in our business and/or supply chains.

We expect our suppliers, and their suppliers, to have Freedom of Association and grievance procedures in place for all their workers. All parties should also support state-based judicial and non-judicial grievance procedures and remediation at all times. *Bidfresh should become involved in grievances only when all local and site-based remediation and grievance mechanisms have been exhausted by an individual or an organisation who represents them, or if parties feel that these have not resulted in adequate remedy.* It is our role to support our suppliers to put in place suitable local and site-based mechanisms and ensure they have qualified staff to manage those mechanisms and any grievances raised.

TRAINING: RAISING AWARENESS AND CAPACITY BUILDING

During the financial year 2019-2020 the following have been completed:

- Social Systems/Lead Auditor training was completed by a number of employees including buyers and Technical.
- Training materials have been created for buyers/sales teams on Bidfresh ethical trade
- A monthly newsletter to highlight topical issues in our supply chains was distributed to all sites and employees raising awareness to all staff

The Ethical Trade team also continued to attend a range of events, working groups, forums and conferences to stay informed on ethical trade and pursue continuous improvement.



PLANS GOING FORWARD

Our current risk assessment of supply chains within our business assess the level of risk of modern slavery and exploitation to be low. However, we cannot be complacent, especially with the current world situation providing an environment and conditions that may allow modern slavery to increase.

In the coming financial year Bidfresh are committed to:

- Reviewing our current supply chains and re-evaluating the risk in light of the Covid 19 pandemic focusing on the top 10% of our suppliers.
- Continuing to train all employees and raise their awareness, not only in relation to our business and supply chains but from a wider perspective. We will continue to review current training materials and the method of delivery to ensure best practice and increase employee engagement.
- Reviewing our current Ethical trade approval systems including our current use of SEDEX

To date, no modern slavery has been identified in our internal operations nor are we aware from our audit and verification processes of any in our supply chains. We will continue to monitor the effectiveness of our existing controls internally, and review annually what improvements may be made to strengthen our auditing and verification procedures.

www.bidfresh.co.uk

