



MODERN SLAVERY STATEMENT

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This statement has been issued in accordance with the Modern Slavery Act 2015 and covers Bidfresh Limited. It has been considered and approved by the Bidfresh Board of Directors. 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



INTRODUCTION: COMPANY COMMITMENT AND PLEDGE

Modern slavery is the umbrella term used to encompass the offences of slavery, servitude, forced or compulsory labour and human trafficking. The term extends to slavery-like practices such as debt bondage, sale and exploitation of children and forced or servile marriage. It is widespread and recognised to be a growing issue, given the rapid rise in global migration. It exists in every region and every type of economy; industrialised, developing or in transition. No sector or industry is untainted. Modern slavery thrives on vulnerable and unprotected workers, and is driven by discrimination, inequality, poverty, and greed for financial gain.

According to the International Labour Organisation (ILO), in 2016 an estimated 40.3 million people were victims of modern slavery, and of these, 24.9 million people were in forced labour in various sectors, including construction, agriculture and fishing. 10,000 people in the UK alone were referred to authorities in 2019 in relation to modern slavery; the real number of people trapped in slavery is estimated to be much higher.

At Bidfresh we recognise that modern slavery is a crime that can take many forms; we have a zero-tolerance approach to modern slavery within our own business, with our suppliers of agency labour and in our dealings with our food and non-food product suppliers. We're committed to putting effective systems and controls in place to safeguard against any form of modern slavery within our business or our supply chains.

OUR BUSINESS AND SUPPLY CHAINS

Bidfresh is a specialist fresh food supplier with a decentralised model of management encouraging the entrepreneurial spirit contained in each of its businesses. Our fishmongers, greengrocers and butchery 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 hold 13 sites and 14 brands across the UK, supplying to the chefs and the caterers. 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.

¹www.antislavery.org

EXAMPLES OF LABOUR RISKS RELEVANT TO BIDFRESH SUPPLY CHAINS

WARM WATER SHRIMP	PERUVIAN ASPARAGUS	SOUTH AMERICAN BEEF	FROZEN, FRESH AND AMBIENT TUNA
<p>There have been documented cases of severe exploitation of workers, specifically of migrant workers in the Thai peeling sheds and Bangladeshi shrimp-fry collectors.</p>	<p>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.</p>	<p>Cattle ranches exploit slave labour for tasks such as building fences, tending to cattle, applying pesticides etc.</p> <p>The isolation of farms/ abattoirs and a shortage of inspectors to uphold the law is what can result in worst-case scenarios.</p>	<p>Use of transshipment is prevalent in these supply chains. Transshipment 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.</p>

EMPLOYEE CONDUCT AND ETHICS:

We have robust people policies and standards in place to ensure compliance with legislation and fundamental rights at work including: freedom of association, dignity at work and prevention of discrimination throughout employment. Prior to recruitment, we check that all our potential recruits have the Right to Work in the UK.

Our policies and standards are readily available to our employees through our intranet and notice boards. We operate a Preferred Supplier List (PSL) for the provision of agency labour and expect agencies that provide staff to Bidfresh to adhere to the same strict standards. All of our PSL Agencies are required to agree to terms and conditions to ensure their compliance with relevant UK legislation, regulations and codes of practice.

We have put in place a comprehensive code of conduct which includes fairness, non-discriminatory reporting, respect for human dignity and human rights, social justice, health and safety and ethics.

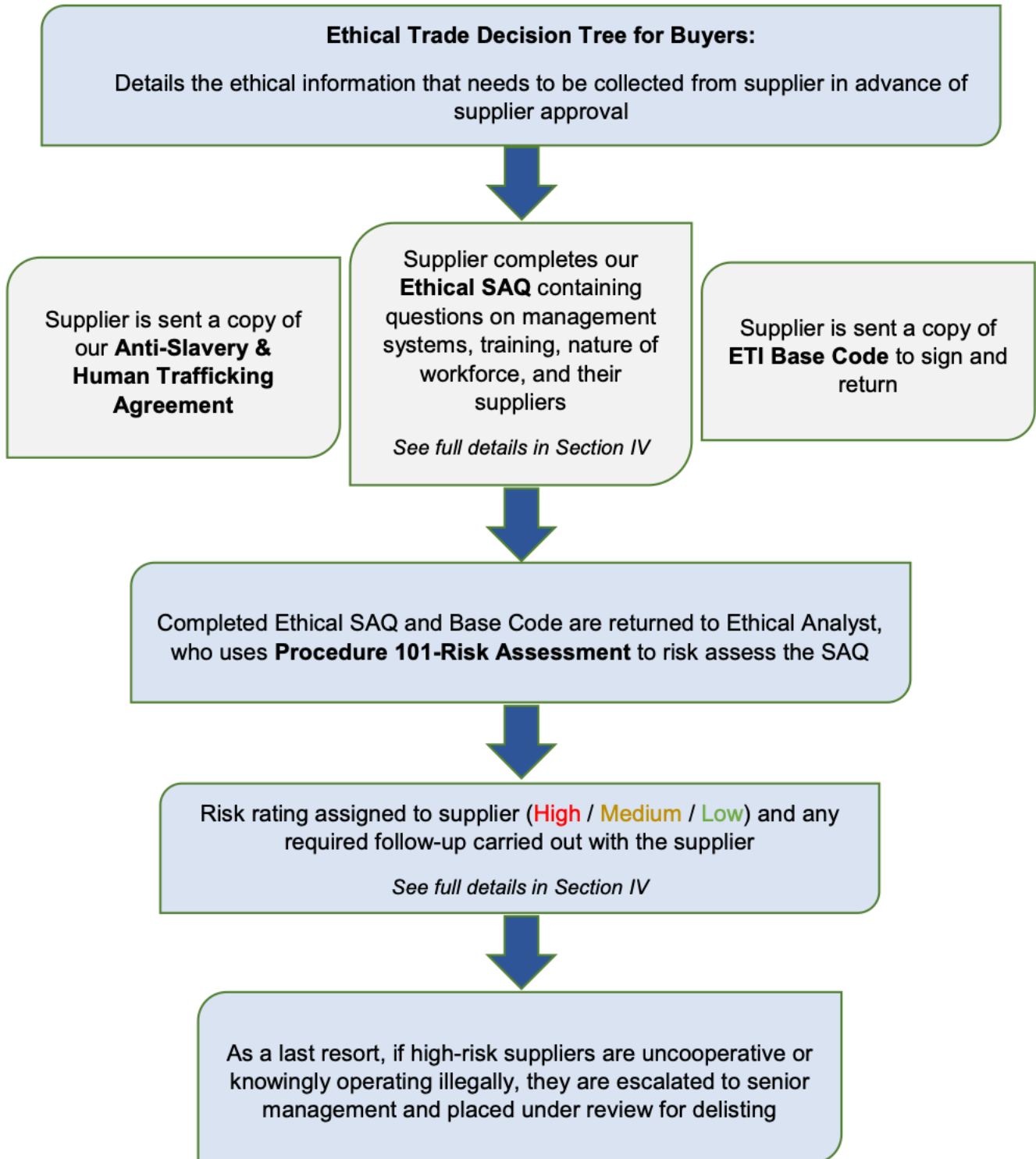
Additionally, we have an Anti-corruption and Bribery Act compliance programme in place. If any employee's behaviour falls short of our expected code of conduct, we have a performance management approach that includes everything from coaching and guidance right up to termination of employment.

If any employee has a concern that they feel they can't raise at work, they can contact our external and independent 24 hour whistleblowing hotline, which is described in more detail under 'Monitoring and Remedial Action'.

We're committed to working with our suppliers to operate ethically and to build greater transparency within our supply chains. We aim to act dutifully and always within the law and regulations in the UK. As a minimum we expect all suppliers to comply with our ethical code of conduct (Ethical Trading Policy) which is based on the principles of the Ethical Trading Initiative (ETI) and relevant International Labour Organisation (ILO) standards and conventions. Suppliers must also comply with national and international laws.

Prior to trading, all suppliers undergo a thorough supplier approval process.

OUR MAIN ETHICAL DUE DILIGENCE PROCESS FOR SUPPLIERS IS AS FOLLOWS:



Failure by a supplier to meet our standards may jeopardise their ability to continue to do business with us and are addressed on a case-by-case basis. If, following an in-depth investigation, the supplier still refuses to cooperate with Bidfresh's Ethical Trading Policy and due diligence process, we will cease trading with that supplier. If modern slavery or human trafficking is identified in our supply chain, appropriate investigations will be conducted internally and the relevant authorities would be contacted.

DUE DILIGENCE PROCESSES

In our business

An annual business risk assessment by the Risk Register Advisory Group evaluates all internal and external risks Bidfresh might face, and assigns priorities based on the relevant business department. Tackling modern slavery remains a top priority for us. We aim to strengthen our understanding of modern slavery within the business and supply chain and implement effective controls to mitigate it.

MONITORING AND REMEDIAL ACTION

Within our business

Often employees are the first people who realise that there may be something seriously wrong within an organisation but often they don't express their concerns. This may be because they feel that speaking up may be seen as being disloyal to colleagues and the organisation, or fear that they may be victimised as a result. Our Whistleblowing Standard aims to encourage and enable our employees to raise serious concerns within Bidfresh through approved channels rather than overlooking a problem. We have a 24-hour whistleblowing hotline that anyone can call (employee, visitor, contractor or agency worker) if they suspect malpractice, and this is well advertised across all Bidfresh sites. Our whistleblowing procedure is designed to make it easy for anyone to make disclosures, without fear of retaliation; they can telephone, email or log an issue via the website, all in multiple languages.

We operate a corporate risk register committee, which includes members of our senior leadership team and entails the review of all risks on a quarterly basis as well as the updating of actions to mitigate those risks. Modern slavery and exploitation within our operations are included on the risk register, which means we are regularly reviewing our current ways of working and how to improve them.

Within our supply chains

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

In 2019 and 2020, key members completed SGS Social Systems/Lead Auditor training and the buying team received training on Modern Slavery and identifying risks.

In December 2021 we launched an e-learning modules, for all Bidfresh employees on recognising and responding to signs of modern slavery with the aim for all employees to have completed the training by the end of January 2022.

We also recognised that Brexit increased the risk of exploitation, given that people traffickers would be aware of the increase in the number of European nationals uncertain about their immigration status. We provided our people managers with additional information and tools to help them manage this increased risk.

PLANS GOING FORWARD

Within our business

Our current processes and procedures have led us to assess the level of risk of modern slavery and exploitation within our operations to be low, but this doesn't mean that we should ever be complacent given that the food industry as a whole is identified to be high risk.

Within our supply chains

The repeated Covid-19 lockdowns and the impact on the industry and our suppliers have prevented us from making as much progress in this area as we would have liked to and so we did not fully meet our previous commitments. However, we are committed to reinvigorating the process during the coming financial year as soon as resources permit.

In 2021-2022, we will review and amend our Ethical Trading Policy and all our current procedures and commitments. We aim to then identify the best ways to collaborate all our suppliers, including non inventory, to mitigate the risk of modern slavery, and provide effective remediation strategies where any modern slavery is identified within their supply chains.

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.

Supporting the principles and standards of:

Ethical Trade Initiative

International Labour Organisation

UK Gangmasters and Labour Abuse Authority

This statement has been approved by the Bidfresh UK Senior Leadership Team and will be reviewed annually.