



# MODERN SLAVERY STATEMENT

The background of the page is a faded, grayscale photograph of a port or industrial setting. In the foreground, a large, dark, cylindrical object, possibly a ship's hull or a large pipe, runs diagonally from the bottom left towards the center. In the background, a worker in a light-colored uniform and a cap is visible, standing near some equipment. The overall scene is industrial and somewhat desaturated.

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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), a staggering 28 million people were in forced labour in 2021; the number of people in modern slavery has risen significantly in the last five years. Modern slavery occurs in almost every country in the world, and cuts across ethnic, cultural and religious lines. 52% of all forced labour can be found in upper-middle income or high-income countries, with migrant workers being more than three times more likely to be in forced labour than non-migrant adult workers. In the UK alone, the number of referrals received exceeded 4,000 for the first time in a quarter and is the highest since the NRM (National Referral Mechanism) began in 2009 (Source: [www.gov.uk](http://www.gov.uk))

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 dealings with our food and non-food product suppliers. We are committed to putting effective systems and controls in place to safeguard against any form of modern slavery within our business and 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 chefs and caterers. A full list of our businesses and brands can be found on our website [www.bidfresh.co.uk](http://www.bidfresh.co.uk)



The majority of our tier 1 suppliers are UK-based, which reflects a priority to source fresh, locally, and seasonally wherever possible. However, we also have a number of important products; for example seasonal produce, prawns, tuna and beef that are sourced from 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 transshipment, 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 and rearing, before transferring to abattoirs and then on to be packed and shipped to the UK. In more simple cases, we purchase directly from local farmers or fish markets in the UK. All of the different stages in supply chains may have different human rights issues associated with them.

# 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.

In line with our vision, our People Policies show our commitments to our employees.

We believe honesty and fairness are key.

Our commitment to our employees includes:

## Equal opportunities:

We make sure there are equal opportunities in all areas of recruitment, development, reward and career progression.

## Having a voice:

We believe two-way communication is crucial for business success, so will provide briefings on company progress and regular opportunities for feedback on views and suggestions for improvement.

## Health & wellbeing:

We work with our employees to help maintain personal health and safety at work, and offer employee benefits that add value.

## Fulfilling potential:

We are committed to developing skills so our people can reach their full potential, as we recognise the importance of developing future talent for the sustainability of our business.



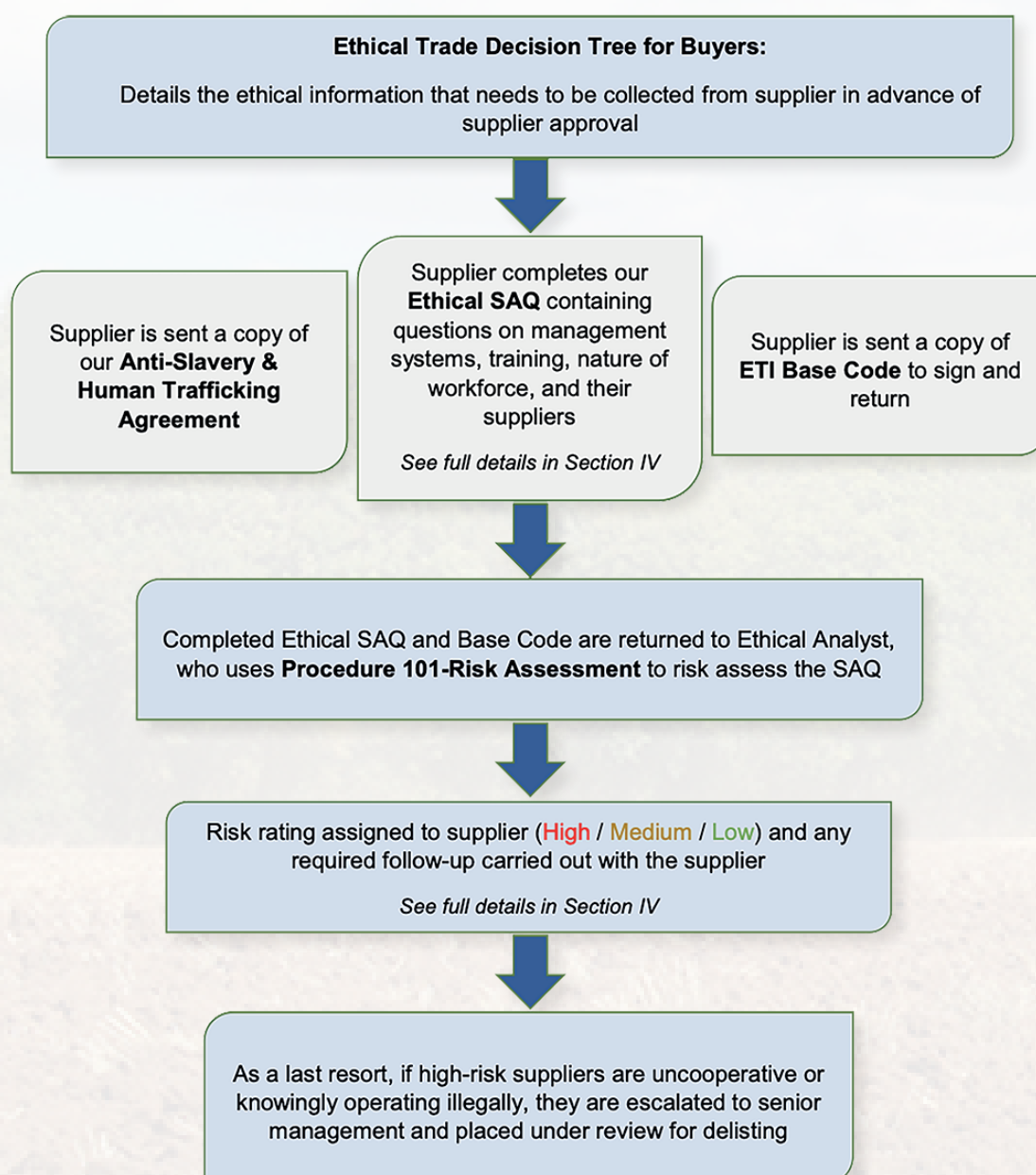


# Due diligence procedures

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 within our supply chain, appropriate investigations will be conducted internally and the relevant authorities contacted.

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. .

During 2022 an E-learning platform was introduced within the business. As part of this introduction all employees completed a compulsory Modern Slavery Awareness module. Via this platform refresher training, and training for all new starters will also take place.

## 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. We plan to continue to raise awareness across the business with targeted training and awareness for roles with direct contact with suppliers such as buyers and technical teams.

### Within our supply chains

In the financial year 2022 - 2023, we aim to continue our commitment to supply chain mapping. We intend to identify our medium and high risk suppliers and begin work with them to ensure that risks in the supply chain are mitigated.

We will review the way in which our suppliers report their social and ethical performance to our business, review and put in place improved and robust reporting, in particular for our suppliers who we deem to be high risk.

**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.