



BRCGS Clause: 3.5	Document Reference: 3.5.9 ST1	Version: 1
Written By: Technical Department	The only controlled version can be accessed electronically via	Issue Date: 18.01.2024
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CFL Modern Slavery Statement

Community Foods Ltd is a leading importer and packer of Dried Ambient Products. We supply dried fruits, nuts, seeds, cereals, pulses, canned and packaged products to some of the UK's largest supermarkets and foodservice companies.

Community Foods is committed to preventing slavery and human trafficking in all its activities and ensuring that its supply chains are free from slavery and human trafficking. As a company we are duty bound to comply with National/International Laws. We will endeavour to do this to the best of our ability, using the international principles of the ILO and UN.

We are committed to a policy of continuous improvement playing a proactive role in the eradication of modern slavery and all its related practices, actively supporting the "Stronger Together" initiative, ensuring compliance with the ETI base code, SEDEX and promoting best practice within both our organisation and that of our suppliers. Our target is to work alongside our suppliers to build effective and transparent supply chains. We have a robust supplier approval process, operated and controlled by our Supplier Technical Team. Below are the prerequisite requirements for all suppliers, manufacturers and service providers.

- Full SEDEX membership
- Linked to Community Foods, with a 100% complete SAQ updated at least annually
- High Risk Suppliers to have an annual SMETA Audit
- Comply with the requirements contained within Communities ethical policy and ETI base code
- Completed Questionnaires/supply chain mapping risk assessment / chain of custody undertaking, comprehensive specification pack
- Acknowledgement of the suppliers own ethical policy is communicated to both their supply base and all employees within their organisation.
- Fully comply and implement ethical legislation within their company and supply base which meets the requirements of The Modern Slavery Act 2015 and Gangmasters Licensing Act.

All suppliers are managed through Community Foods Ltd Risk Assessment, which includes an Ethical Assessment. Community Foods Ltd reserves the right to terminate our relationship with a supplier if issues of non-compliance is observed within our policies or a non-compliance is not addressed in a timely manner.

Policies in relation to slavery and human trafficking

Community Foods policies clearly state that we will not tolerate forced labour (including human trafficking) or child labour in our operations or operations related to supply to Community Foods. We conduct internal and external audits to ensure compliance and operate the following policies that describe our approach to the identification of modern slavery risks, together with the steps to be taken to prevent slavery and human trafficking in our operations:



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- **Preventing Hidden Labour Exploitation Policy** – Community Foods Ltd will knowingly not use any individual or organisation to source and supply workers using practices of forced labour or human trafficking for labour exploitation. The Company will report any evidence or suspicion of cases of hidden third-party labour exploitation to the GLAA immediately. Failure by managers and leaders of the Company, third-party labour providers or organisations in the labour supply chain to act upon concerns of worker maltreatment, coercion or harassment will be regarded as a gross misconduct offence or breach of contract and will be managed accordingly through the relevant disciplinary or contractual termination processes.
- **Whistleblowing Policy** – Community Foods Ltd encourages all its employees to report any concerns that raise suspicions related to human trafficking, both inside our organisation and through the supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Community Foods Ltd whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of reprisal. Employees who have concerns can use our confidential helpline, which is managed by an independent third party organisation.
- **Recruiter Compliance Document** - Community Foods Ltd will ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and know how to identify the behaviour of victims. We ensure these staff have signed the Recruiter Compliance Document.
- **Recruitment Policy** – Community Foods Ltd will not use any individual or organisation to source and supply workers using practices of forced labour, human trafficking for labour exploitation, payment for work-finding services or any work-related exploitation such as forced use of accommodation. All employment agencies must be a member of the GLAA and have procedures in place to manage potential human trafficking issues.
- **Agency workers** - Community Foods Ltd uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it intends to use before accepting workers from that agency. Regular audits of a random selection of agency workers, regular audits of each agency as well as audits of new agencies beginning to supply Community Foods Ltd are part of the processes by which risks of slavery and human trafficking are addressed in relation to agency workers. Organisations may have other relevant policies to which they can refer, for example, a corporate social responsibility policy, which should be accompanied by the steps taken to implement the policy and any examples where it has been used to address slavery and human trafficking risks.
- **Handbook Code of Conduct Policy** – Community Foods Code of Conduct clearly communicates to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Ethical Code of Conduct Policy** – Community Foods is committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Community Foods works with suppliers to ensure that they meet the



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standards of the code. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- **Supplier and Raw Material Approval and Monitoring Policy** – Community Foods Supplier Risk Assessments are required for all suppliers, regardless of their risk category. Where these assessments highlight a significant risk or breach of our requirements, an ethical audit will be required at the suppliers sites. This will either be conducted by an Community Foods representative or by a third party assigned by Community Foods. Failure to comply with these requirements or the principles of our ethical policies will result in the supplier being removed from the Community Foods approved supplier list and therefore no longer able to supply any materials to the company.

Due diligence

Community Foods Ltd undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping, and reviewing, the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Conducting supplier audits or assessments through Communities own staff and third-party auditors which have an element of focus on slavery and human trafficking, where general risks are identified;
- Creating an annual risk profile for each supplier;
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular ("Stronger together", "Membership of Industry Forums" "Ethical trading" initiatives);
- Using SEDEX where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Community Foods has an expectation that our suppliers will have systems in place to effectively monitor working hours, overtime and the number of seasonal workers returning or the number of people leaving the company each year.

KPI's

The organisation has and will continue to review its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015.



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As a result, CFL:

- Stronger Together- Understanding & Tackling Modern Slavery' training courses will be delivered to all employees including agency on-site teams. In order to educate the workforce and enable them to recognise the signs of slavery and human trafficking, this course has been made mandatory to all employees.
- Provides training and awareness for supply chain representatives and increased number of ethical visits to suppliers, growers and manufacturers;
- All HR, Supply Chain and Compliance employees, as well as relevant managers, will attend/ have attended "Tackling Hidden Labour Exploitation" training.
- Community Foods provides information on "Hidden Labour Exploitation" to our workforce through a variety of formats such as workplace posters, worker leaflets, staff presentations during the induction and training period and through internal auditing processes. The company also actively encourages workers to report cases of hidden third-party labour exploitation, provides the means to do so and investigates and acts upon reports appropriately.

Signed:

Martin Rome
Managing Director
19.01.2024