



2016 Slavery and Human Trafficking Statement

About the statement

A core principle of our corporate responsibility is being a fair partner and good employer and we work directly with our suppliers to ensure good working practices throughout the supply chain.

We are committed to improving our practices to combat slavery and human trafficking. We will not work with suppliers who fail to protect the rights of employees, or engage in slavery, trafficking or any other form of human rights abuse.

This statement is intended to communicate the steps that Princes Limited has taken to ensure that slavery and human trafficking are not occurring in any part of our business or supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Groups slavery and human trafficking statement for the financial year ending 31 March 2016

About Princes Limited ('Princes')

Princes is a manufacturer and importer of food and drink products. We are a wholly owned subsidiary of Mitsubishi Corporation.

The Princes Group of companies has over eight thousand employees worldwide with offices and 15 production sites in the United Kingdom, the Netherlands, Italy, Poland, France and Mauritius.

In addition to our fully owned UK manufacturing sites and our Italian tomato processing site, held through our subsidiary Princes Industrie Alimentari S.r.L. (PIA), we have a range of joint ventures that complement our own production capabilities.

- Princes Tuna Mauritius (PTM)– a joint venture with IBL Ltd and the Mauritian State Investment Company, operating two tuna processing sites in Mauritius
- Edible Oils Limited (EOL) – joint venture with Archer Daniels Midland, operating two edible oil bottling plants in Kent, UK.
- Edible Oils Polska – joint venture with Archer Daniels Midland, operating an edible oil bottling plant in Szamotuly, Poland.

Further details of our business and operations can be found at <http://www.princesgroup.com/about-princes/>



Policies and philosophies

The Princes Group Code of Conduct provides guidance to employees on local laws and global standards such as the Universal Declaration of Human Rights. All employees must use the Code of Conduct as a guide in daily operations, to be aware of their responsibilities as a member of the Group, to review the relevant laws and internal company rules and to conduct themselves with integrity.

Our Ethical Trading Policy (<http://www.princesgroup.com/downloads/princes-ethical-trade-policy-august2013.pdf>) was established in 2013 and adopted by all Group companies. It requires adherence to all international norms and codes regarding human rights, including the Universal Declaration on Human Rights and the core labour standards of the International Labour Organisation (ILO).

It is a requirement for suppliers to comply with (i) all applicable local and international laws, which would include those relating to labour used in the supply of finished goods and raw materials, and (ii) the principles of the Princes Group Code of Conduct, which incorporates respect for human rights and the Princes Group Ethical Trading Policy.

Our supply chains

Our extensive supply chain reaches across more than 40 countries and we take a partnership approach with suppliers, seeking to foster long term supply agreements in order to provide the security and integrity that we, our customers and consumers demand.

Our suppliers provide both finished goods and raw materials for manufacturing across all of our core product areas, which are fish, meat, fruit, tomatoes, pasta, beans, vegetables, edible oils and a broad range of soft drinks.

Due diligence and risk assessment

All employees are issued with the Princes Group Code of Conduct and given regular training which is monitored by our Compliance Committee.

We actively support employee engagement, representation and the ability of an employee to raise concerns. Freedom of association and the right to collective bargaining are core labour standards that we respect, as guided by the ILO. We apply our employment practices in line with, and in certain aspects, exceeding the requirements of local legislation. All Princes owned and joint venture production sites are also SEDEX (Supplier Ethical Data Exchange) registered and undergo annual audits.

All agency labour currently utilised in our UK Princes and EOL operations is provided through a business accredited by the Association of Labour Providers and who is a Stronger Together registered business partner. They have a documented Hidden Labour Exploitation Policy and are committed to raising awareness of hidden labour exploitation through its processes and through communicating key indicators to operational staff.



Our PTM Riche Terre site has held SA8000 certification for social accountability since 2003 and was the first global supplier of canned tuna to do so. This provides a measurable international standard in working conditions and practices and is recognition that the company has adopted policies and procedures that protect the rights of workers. Our second PTM site at Marine Road, acquired in 2015 is currently working towards attaining SA8000 accreditation.

A number of companies provide services to our production sites such as cleaning, security and staff restaurants. In 2015 we commenced proactive communication to these service providers on the Modern Slavery Act to promote awareness and remind them of their legal and contractual obligations. We will continue to actively engage with all third party companies that provide services to our operations.

We consider that the greatest risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and direct managerial oversight are out of our direct control. We also recognise that we currently procure in a number of countries where human rights are an issue of particular concern.

To identify and mitigate risk we have been working with our suppliers to ensure that they embrace SEDEX providing visibility of supplier standards in ethical labour management through self-assessment questionnaires. All of our finished goods suppliers have achieved SEDEX membership.

SEDEX provides us with an initial risk assessment for suppliers and supply chains with country and product category specific intelligence. This allows us to monitor and mitigate the risk of slavery and human trafficking by providing insight into any high risk areas. In addition, our own knowledge and experience from cross functional teams, allows us make informed risk assessments for specific raw materials, sectors and countries.

Our risk assessment shapes our future purchasing strategy, audit schedule and any remediation action necessary with the supplier or, using our influence, to instigate positive change in the wider supply chain or industry.

If we identify cases of non-compliance to our Ethical Trading Policy or any relevant legislation we communicate our remediation requirements and provide support for redressing specific issues. If the supplier is unable to satisfactorily address these issues, we reserve the right to terminate business with immediate effect. This is a provision in our Standard Conditions of Purchase.

In the event of evidence of labour violation in our upstream supply chain we will address the issue with our supplier but also seek to work with relevant stakeholders such as government, appropriate trade bodies and Non-Government Organisations in order to resolve issues. If it is possible to identify individual cases of unethical working practices we will eliminate the individual supplier from our supply chain if remediation action is unsatisfactory.



Training

In addition to our existing schedule of compliance training, in 2016 we will commence specific training to our HR, buying and technical teams on the issues of modern slavery and human trafficking. This training will be provided in the local languages of all of our operations and will be monitored by our Compliance Committee. These key functions will be trained initially; however training will be extended to all employees of Princes Group companies as a matter of compliance.

Our effectiveness in combating slavery and human trafficking

We do not have key performance indicators specifically in relation to slavery or human trafficking as any instances of these would be a non-compliance and breach of employment laws, our own employment practices, Code of Conduct and Ethical Trading Policy. However, the practices that relate to the mitigation of slavery or trafficking risk do have internal performance measures.

In our own operations, any alleged breach of the Group Code of Conduct or Ethical Trading Policy is investigated and recorded as a matter of compliance where relevant.

In our supply chain, we monitor supplier SEDEX membership and Self-Assessment Questionnaires, which include investigation and time-bound actions to follow up and close out any non-conformances raised.

Looking ahead

Within the context of our broader human rights commitments, we recognise the importance of maintaining constant vigilance to identify and address any activities associated with slavery and human trafficking throughout our global operations and supply chains.

In recognition of the importance of these issues, we are committed to continuing to enhance our capacity to identify, prevent and mitigate any actual or potential activities in this field.

Approval

I, Manabu Oda, hereby certify that the information contained in the above 2016 Slavery and Human Trafficking Statement is factual and has been approved by Princes Limited's Board of Directors.

A handwritten signature in dark ink, appearing to be "Manabu Oda", written in a cursive style.

Manabu Oda
Deputy Chairman and Chief Executive Corporate
Princes Limited
July 2016