

The Compleat FOOD GROUP



The Compleat Food Group: Modern Slavery and Human Trafficking Statement

Financial Year 2018

This statement is in response to the Modern Slavery Act 2015, and sets out the Company commitment to identifying and preventing modern slavery and human trafficking in any part of its business and supply chain.

The Compleat Food Group is a fast-growing food business that supplies own-label and branded chilled, frozen or ambient foods to the major supermarket chains in the UK, in addition to Food Service and food manufacturers. They source food products from a wide number of manufacturing facilities based throughout Europe.

The Compleat Food Group refers to:

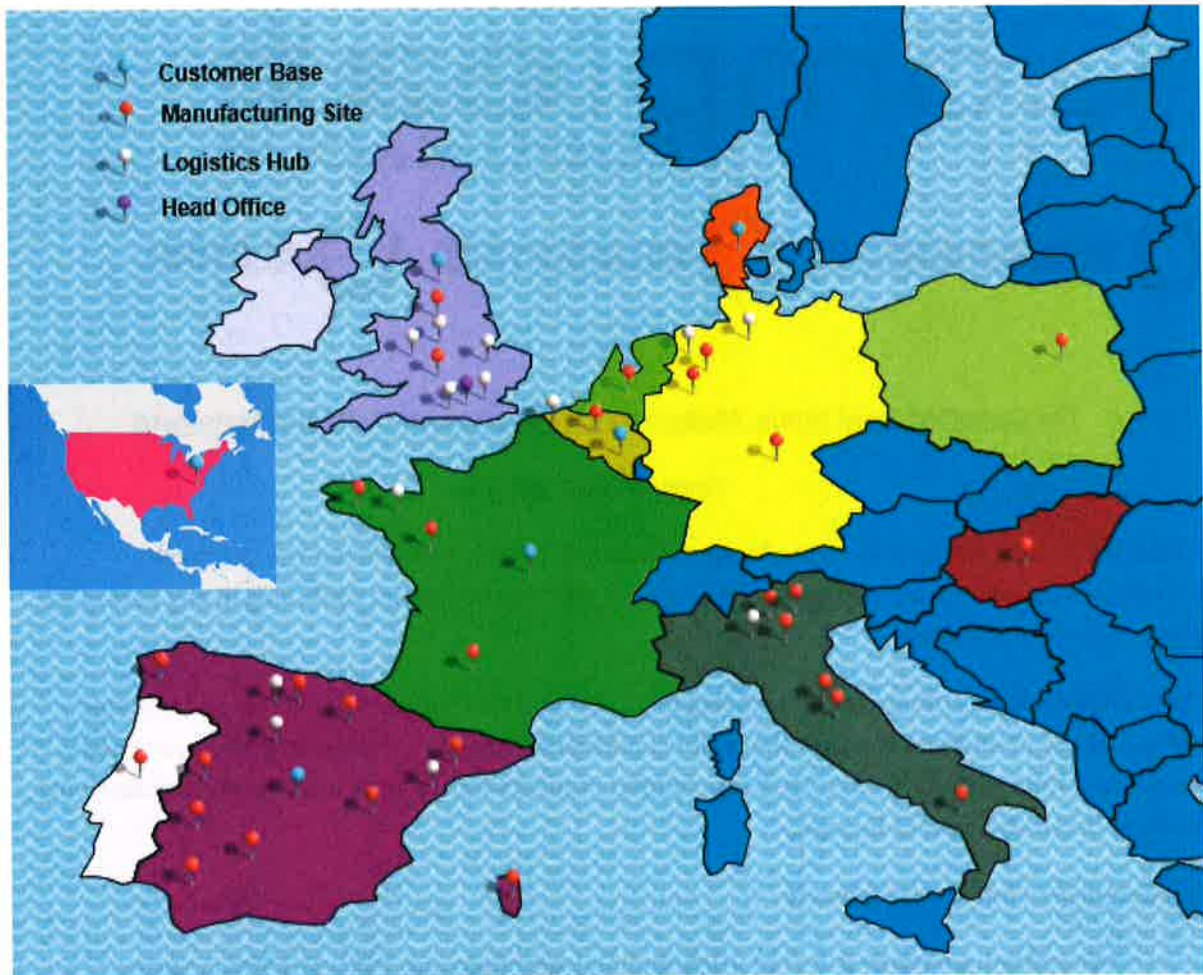
- Winterbotham Darby & Co Ltd. (Distribution warehouse and Offices), Redhill, Surrey.
- Deli Solutions Ltd. (Manufacturing Facility), Clitheroe, Lancashire.
- Alatoni Ltd. (Manufacturing Facility), Bicester, Oxfordshire.

The Company commits to developing and adopting a proactive approach to tackling modern slavery and human trafficking within its UK business practices, as well as through risk assessment and due diligence of its supply base throughout Europe.

The supply chain

Winterbotham Darby & Co Ltd. is a UK based warehouse and head office with functions including: procurement, technical, product development, commercial and finance. This company is a supplier of continental products typically produced in manufacturing sites across Europe. The supply base is complex with primary sites being based throughout Europe who procure raw materials from a worldwide supply base.

Deli Solutions Ltd. and Alatoni Ltd. are both manufacturing sites of olives and anti-pasti. These sites import raw materials from a worldwide supply base for further processing within their UK based manufacturing facility.



Steps to prevent modern slavery and human trafficking

The Company has policies and procedures in place which state that modern slavery and human trafficking will not be tolerated throughout its supply chain. Risk assessment is regularly undertaken, in line with company policy and with support of external stakeholders, to identify potential risk of modern slavery and human trafficking.

The procedures in place to identify and prevent modern slavery and human trafficking in the supply chain include:

1. All primary manufacturing partners undergo ongoing risk assessment and auditing of their manufacturing practices, in line with Company policy.
2. Confidential reporting structures for the reporting of modern slavery and human trafficking within the businesses are in place.
3. Where cases of modern slavery and human trafficking are suspected investigations are carried out with the manufacturing facility, and appropriate local authorities.
4. Commencement of supply is reviewed from any aspects of their supply chain where modern slavery and human trafficking is discovered or suspected.

5. Where modern slavery and human trafficking is discovered or suspected the decision to re-commence supply with a manufacturing facility will be based on findings of the investigation, and will be risk assessed by the Company, and where relevant the customer
6. All cases of identified modern slavery and human trafficking will be reported:
 - a. According to country specific local law
 - b. Where appropriate, the customer of the final products affected

In addition to the Modern Slavery and Human Trafficking policies the company is developing a Human Rights policy. This policy will be in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

Implementation within the UK

A multifunctional team was formed in order to embed the fundamental principles of identifying and removing any forms of modern day slavery or human trafficking from within our UK facilities. The team, which includes stakeholders from different departments, has thoroughly analysed the provision and flow of workers within our business and identified areas where they may be vulnerable. By engaging people from different departments, it has helped us devise policies and procedures best suited to business operations. This ensures they are both relevant, functional and therefore implemented correctly and in full. The team has a monthly meeting to keep up to date on Ethical issues.

The Modern Day Slavery team has created a business recruitment policy, which details how recruitment shall be performed, the procedure for interview, those staff who should be involved in the recruitment process and details of the written job contract.

Recruiter compliance principles are completed by all employees involved in recruitment. Every month randomly selected workers are required to complete questionnaire on their employment, confidentially, offering them the means to alert the business to any concerns they may have.

The number of labour providers used at sites has been rationalised to give focus. A centralised template for auditing labour providers has been developed which includes face to face interviews with agency workers. Labour providers are audited annually, the least.

The company are engaging with the UK labour providers to join the Clearview certification scheme.

The company are now members of ALP (Association of Labour Providers) which provides information and support to all the UK sites.

We have identified that other third party service provider, such as transport and logistics present vulnerable areas where exploitation could be occurring within our supply chain. To help us understand and manage this risk we are part of a FNET working group on Transport and Logistics and the Sedex Goods Not For Resale working group.

Training

This year the Company has become members of the ALP. This resource offers access to specialist training and events which members of the HR and technical functions have attended, for example workshops on responsible recruitment and Clearview.

We have been liaising closely with our agency labour providers, to encourage their engagement also in such workshops and training events to build on their knowledge and understanding of modern day slavery. Over the next year we aim to continue this engagement, further involving our transport and logistics supply chains.

Our company induction now includes a section on What is Modern Day Slavery, how to spot the signs, and what to do if you are or suspect someone is a victim of modern slavery.

In 2019 we aim to further develop understanding of modern day slavery in the supply chain for our employees involved in procurement and purchasing through bespoke training.

European Manufacturing

Over the past 12 months efforts have been focused on the engagement of our manufacturing base in the issues surrounding modern day slavery and human trafficking.

All existing and new suppliers are required to comply to the company's Ethical Policy, which has been reviewed and the new version issued to all sites.

To obtain an understanding of the ethical status of new sites before supply commences we have introduced an Ethical section within our New Supplier Questionnaire. This gives initial information which will then be followed by membership of Sedex or Completion of a SAQ depending on the supplier/customer.

Sedex (Supplier ethical data exchange) is a useful tool to the business helping to identify and mitigate risk within our supply chains. Sedex provides us with an initial risk assessment for a supplier taking into consideration known inherent country and industry risks. This allows us to identify and monitor specific high risk products or areas that are identified.

The Company requires all sites that supply UK retailer own brand products to be members of Sedex. Sites must be fully linked to WBD, with fully visibility rights of their SAQ and audit information. Sites must have a fully completed SAQ to be reviewed every 6 months. This is also now a requirement for many of our Food Service customers.

For production partners that supply branded lines and ingredients they are also required to join the Sedex network, or they complete the WBD Ethical SAQ. 41% of branded sites have joined Sedex.

Primary Agriculture and Processing

Further down our supply base, we recognise the need for further education on the fundamentals of modern day slavery and human trafficking. Our supply base consists of hundreds of small growers and farmers and reaching out to these producers using appropriate communication methods and materials remains a constant challenge. Vegetable growers and livestock farmers are required to complete SAQs or join Sedex to give visibility of ethical within these supply chains. In 2017 47 vegetable growers and 27 livestock farmers completed SAQs.

Risk Assessment

The scope of our risk assessment has expanded as we explore this risks down our supply chains. We will therefore be reviewing our risk assessment in 2018 to ensure that it focuses on the key risks for each part of the supply chain and defines next steps required where risks are identified.

Audits

We work with a team of global independent auditors to conduct ethical audits. We use local auditors who are familiar to the laws, working practices and language of the country where the audit is taking place. Audits consist of observations from a site tour, paperwork reviews, confidential employee interviews and management interviews.

In 2017 we commissioned 29 independent ethical audits.

If a non-conformance is identified, our aim is to work together with sites and certification bodies to implement sustainable solutions to resolve these issues.

We trend audit non-conformances to highlight common areas, which require focus. Best practice guides have been written on key areas and communicated to sites, encouraging business to internally review their procedures against these suggestions, with the aim of driving sustainable change.

The scale, complexity and seasonality of our supply base of primary growers and farmers, means that specific independent audits are not always possible. Therefore additional ethical compliance questions have been incorporated into the standard WBD visit template, so this data can be captured whenever a site visit is undertaken.

Collaboration

The Company acknowledges that the most powerful means of driving sustainable change within global food supply chains is through collaboration and the collective leverage of the food industry as a whole.

The Company including the UK manufacturing sites are business partners of Stronger Together, a multi stakeholder initiative aiming to reduce modern slavery, particularly hidden forced labour,

labour trafficking and other third party exploitation of workers. As business partners we provide evidence to publicly demonstrate the business's commitment to tackling hidden labour exploitation.

The Company is a member The Food Network for Ethical Trade (FNET) which has been established to improve human rights in global food supply chains through a common approach to managing ethical trade. It aims to support suppliers to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and build a forum for sharing issues and challenges and, in the longer-term, to support the food industry to focus on promoting human rights in global food supply chains.

The company is a member of the Sedex Stakeholder Forum (SSF), which brings together manufacturers, brands, retailers, NGO's, auditing bodies and industry experts to discuss challenges in ethical trade and responsible sourcing and solve these problems collaboratively.

As a member of transport and logistics working groups within Sedex and FNET the company is able to collaborate to understand this part of the supply chain.

In addition to the above, the Company are actively engaged with our retail customer Ethical Trade workstreams. Supporting best practice groups and guidance workshops.

This year the company became members of Association of Labour Providers (ALP) which provides information and support for all the UK sites.

Throughout 2018-2019 we envisage continued active involvement in such collaborative working.

Ethical Strategy

In order to assess the effectiveness of the Company's work to tackle modern day slavery within our supply base we routinely monitor the following KPI's;

- Number and nature of concerns reported on employee hotline
- SAQ completion
- Review of ethical audit non conformances
- Completion of ethical audits to customer requirements
- Upload of ethical audits onto Sedex
- Completion of ethical audit non-conformances within agreed deadline

Ethical is reviewed during quarterly Technical Performance Updates and UK Site Update meetings. In addition, key KPIs are included in the monthly Executive meetings.

Signed:

A handwritten signature in black ink, appearing to read 'S J Higginson', with a long horizontal flourish extending to the right.

Steven Higginson

CEO

Date: 16th October 2018.

