

# **kff 471a MODERN SLAVERY STATEMENT**

## **Introduction**

This statement is issued by Kent Frozen Foods Limited (trading as kff).

kff is a well-established specialist supplier of frozen, chilled, ambient food products and other consumer goods to the foodservice industry. In 2018, we became a part of the Sysco Corporation, the global leader in foodservice. Since then, we have been in a transition phase of adapting our business structures and processes to the new global framework we now operate within, as well as continuing to ensure our compliance with all applicable UK laws, regulations, and best practice.

kff is fully committed to ethical working practices, and, as a company, regards inhumane conditions such as slavery, worker exploitation, and human trafficking as completely unacceptable either within our own business or through our supply chains.

We recognise that modern slavery is a crime that can take many forms. We strive to act ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

Our suppliers are required to adhere to the Sysco Supplier Code of Conduct, which contains a section on “Labor and Human Rights” and to a set of values which require them to act with integrity and responsibility, uphold Sysco values and to always do the right thing (<https://sysco.com/Suppliers/Supplier-Partnerships/Supplier-Resources.html>).

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our Board fully supports the aims of the Modern Slavery Act and is committed to combating the risk of slavery and human trafficking in our business.

## **Our Supply Chain**

Whilst many of the products sold by kff are sourced locally or from within the UK, we also source globally to support the range, quality, provenance, availability, and price requirements of our customers.

## **Prevention of slavery and human trafficking in kff**

### **Right to Work Checks**

All colleagues employed by kff who work on a temporary, fixed term or permanent basis are subject to a right to work check in accordance with UK legislation. A person is unable to commence work for kff unless they first satisfy us that they are legally able to work within the UK.

### **Resourcing**

Where kff employs the services of an employment agency to source candidates for permanent or fixed term positions, we will use agencies of good repute, who are licensed by the governmental GLAA (Gangmasters and Labour Abuse Authority) and who are listed on our preferred supplier list. kff requires the agencies to undertake appropriate background checks on prospective colleagues, in conjunction with our own checks.

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## Agency Workers

Where kff use temporary workers supplied through an employment agency, we require the agency to undertake appropriate background checks on the agency worker and we expect all agencies to comply with the Sysco Supplier Code of Conduct and the kff Ethical Assurance Policy, which incorporates compliance with the Modern Slavery Act and other critical legislation. We operate a preferred supplier list for these employment agencies to help ensure the agencies used are of good repute and maintain the high standards we expect.

If kff identifies that an employment agency is not adhering to our standards or should they lose registration with the GLAA, the agency will be removed from the preferred supplier list and will not be engaged in any further recruitment activity on any basis.

## Whistleblowing policy

kff has a whistleblowing policy in place under Sysco's Global Code of Conduct, which applies to all employees, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers or any other person associated with kff. Any colleague who have concerns about any aspect of kff or our supply chain is able to disclose their concerns confidentially through the Ethics Line. Any concerns are investigated thoroughly.

## Prevention of slavery and human trafficking in kff supply chains

### Supplier adherence to our values

kff requires all suppliers to adhere to the Sysco Supplier Code of Conduct. To further ensure that all those in our supply chain comply with our values, all our suppliers must go through a screening process and sign up to kff's 'Code of Practice for Suppliers'.

Our relevant policies are reviewed annually to continuously monitor and implement any changes required by the Modern Slavery Act 2015 within our business and supply chain. We work with our suppliers to ensure they are aware of our joint responsibilities and our requirement for them to adhere to the practices and controls we put in place to ensure the welfare of those employed within their supply chain. We also continue to remind our suppliers that we require their cooperation with any inspections and / or investigations conducted by kff from time to time to allow us to verify compliance with our policies.

kff is a member of SEDEX, one of the world's largest collaborative platforms for sharing responsible sourcing data in supply chains. The SEDEX platform assists kff and its suppliers with managing and improving performance when it comes to labour rights, health and safety, the environment and business ethics.

kff has formed an action group which comprises colleagues from our Merchandising, Technical, Human Resources and Legal teams to review our Modern Slavery Statement and related policies and to consider what further improvements can be implemented by the business.

We will continue to review the effectiveness of these controls in reducing the risk of unethical practices.

## Training

kff's policies and standards are readily available to colleagues through our shared document network and physical notice boards. All Sysco employees must complete mandatory online training on the Sysco Global Code of Conduct, which prohibits child labour, forced labour, and human trafficking in our global supply chain. We provide online training on Modern Slavery to colleagues, which provides an overview of the legislation and the risks of modern slavery and human trafficking in our supply chains and our business.

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We continue to train all managers in conducting right-to-work checks in respect of new starters. Further guidance is provided to managers in a document known as the ‘manager’s toolkit’ and is accompanied by a short video to support their learning and understanding.

### **Reporting on our Progress**

During the last 12 months:

- All Sysco employees have completed mandatory online training on the Sysco Global Code of Conduct, which prohibits child labour, forced labour, and human trafficking in our global supply chain.
- We have incorporated the Sysco Supplier Code of Conduct into our Terms and Conditions of Purchase.
- All colleagues now have access to the online Modern Slavery training module on the Sysco online training portal, “Thrive”.
- Our Induction Pack for new employees includes an awareness training document to ensure Company’s zero-tolerance approach towards Modern Slavery is communicated to all new starters.
- We have started to utilise the SEDEX platform to review our supplier base and supplier data more closely and, thereby, better identify risk areas. The SEDEX platform provides us with enhanced visibility of the ethical risks across our supply chain. We have required new suppliers to join SEDEX as part of their onboarding process.

During the last 12 months we can confirm that there have been no reports of slavery or human trafficking within the kff supply chain.

### **Further Steps**

We recognise that more can always be done to tackle Modern Slavery, and, as a business, we remain committed to helping to increase awareness of the issue and to a process of ongoing review of our practices and policies to combat the risk of slavery and human trafficking. We intend to take the following steps to continue to further combat these risks, going forward:

- We will continue to build on the Modern Slavery training provided on the Sysco online portal “Thrive”, by ensuring that all kff colleagues are mandated to complete the course and by providing more targeted training for our supplier-facing colleagues in the Procurement, Finance and Technical teams. The training will focus not only on developing an understanding of core ethical issues but also on the practical steps that can be taken to tackle the root causes of modern slavery issues in supply chains. We will ensure that all new starters in these areas are provided with appropriate training on their induction and receive refresher training as required.
- We will continue to roll out the SEDEX platform among our existing supplier base, to provide us with enhanced visibility of ethical risks across our supply chain.
- We will continue to work with our global risk and ethics function at Sysco, to ensure we are sharing best practice and pooling knowledge on the risks of modern slavery in our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Signed.....  
**Mark Taylor - MANAGING DIRECTOR**

Date.....20 December 2024

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