



MODERN SLAVERY STATEMENT

Issue No: 005

Ref No: Kff 471a

Date: 06/01/2021

Introduction

Ethical operational practice is one of the core company values here at Kent Frozen Foods (KFF). We recognise modern slavery as a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. This crime can manifest itself in many ways, it can take various forms, such as slavery, servitude, forced or compulsory labour, human trafficking, and other forms of labour exploitation.

KFF is committed to transparency in our approach to tackling modern slavery in our own business and throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our senior management fully supports the aims of the Act and is committed to combating the risk of slavery and human trafficking in our business and supply chain.

KFF has in place ethical trading standards to which each of our suppliers is required to adhere, as well as a set of values which require us, among other things, to act with integrity and responsibility, and to always do the right thing. Our commitment to anti-slavery and human trafficking is further strengthened by our Modern Slavery Policy, which applies to all employees, officers, workers, contractors, suppliers, and other business partners.

1. Organisation Structure and Supply Chain

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.

Whilst KFF prides itself in sourcing local products, our supply chain does also source globally to add versatility and authentic provenance to the wide range we offer to our customers.

2. Our Policy

KFF, as a business, fully understands its responsibilities under the Modern Slavery Act 2015. Therefore, we have a zero-tolerance approach to modern slavery. Our Modern Slavery Policy is implemented and monitored through various operational processes of our business and supply chain.

As a responsible company, we aim to continuously improve on our systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in our supply chain.

3. Our Due Diligence Processes:

In Our Business Operations:

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 satisfy us that they are legally able to work within the UK.



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Resourcing

Where KFF employs the services of an employment agency to source candidates for permanent or fixed term positions, we endeavour to only use agencies of good repute and who are listed on our preferred supplier list. KFF requires the agencies to undertake the appropriate background checks on prospective colleagues, in conjunction with our own checks.

Agency Workers

Where KFF uses temporary workers supplied through an employment agency, we expect and require the agency to undertake the appropriate checks. We operate a preferred supplier list for these agencies and those listed are expected to undertake the appropriate background checks on prospective colleagues and to comply with our employment policies, which incorporates compliance with the Modern Slavery Act and other critical legislation.

If KFF identifies that an employment agency is not adhering to our standards, 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 has concerns about any aspect of the Company is able to disclose their concerns confidentially through the Ethics Line. Any concerns are investigated thoroughly.

In Our Supply Chain:

Supplier adherence to our values

To ensure all those in our supply chain comply with our values, all our suppliers must go through screening process and sign up to our 'Code of Practice for Suppliers'.

KFF is now a member of SEDEX, one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chain. 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 and we are currently working towards linking our suppliers to SEDEX to ensure effective monitoring and transparency.

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

4. Training

KFF's policies and standards are readily available to colleagues through our shared document network and physical notice boards. We continue to train all managers in conducting right to work checks in respect of new starters and

we have improved our processes such that no new employee can be set-up on payroll without having first passed a right to work check.



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5. Reporting on our Progress

All of 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 were 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.

We continue to review the effectiveness of our supply chain controls in reducing the risk of unethical practices and we have now started to utilise a new SEDEX tool that provides us with enhanced visibility of the ethical risks across our supply chain by allowing us to review our supplier data more closely and, thereby, better identify risk areas.

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

6. 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, including our Modern Slavery Policy and Supplier Code of Conduct, 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 ensure that our management team who, in conjunction with our Human Resource department, takes part in employee recruitment, are provided with appropriate and detailed training to ensure their understanding of their obligations under the Modern Slavery Act 2015.
- Our Induction Pack for new employees will include an awareness training document to ensure company's zero-tolerance approach towards Modern Slavery is communicated to all new starters.
- We will enhance transparency in our supply chain by using the SEDEX new Self-Assessment Questionnaire, which we will require our suppliers to complete within 12 months, to provide us with an updated risk profile of the supply chain.

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

Signed
Phillip White – MANAGING DIRECTOR