

MODERN SLAVERY ACT 2015

SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps that Vestey Holdings Limited and its subsidiaries have taken during the year ending 31 December 2018, and continue to take, to prevent modern slavery and human trafficking in its business and supply chain. See Appendix A of the UK subsidiary companies covered by this statement.

INTRODUCTION

We know that Modern Slavery is a growing and global issue, and that no sector or industry can be considered immune or untainted. Vestey has a zero tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings. We are committed to creating effective systems and having controls in place to safeguard against any form of slavery taking place within the business or our supply chain.

We accept that we all have a responsibility to be alert to the risks, however small, in our business and the wider supply chain. Staff are expected to report concerns and managers are expected to act on them and take appropriate actions.

This statement sets out our actions to understand all potential Modern Slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within our business and our supply chains.

OUR BUSINESS & SUPPLY CHAINS

Vestey comprises twelve food companies operating within the Group. We specialise in the sourcing, processing and distribution of chilled, ambient and frozen products in the meat, fish, seafood, dairy, fruit, vegetables, specialist meal, and fine foods categories. The Group also have two pension advisory businesses.

Our headquarters are in Coulsdon, United Kingdom and we operate in various countries around the world and have offices in the UK, France, Denmark, Belgium, Lithuania, Dubai, Poland, the USA and China. We build long-term partnerships with suppliers and customers alike, and supply products for retail, foodservice, wholesale, hotels and restaurants, governments and manufacturing customers as well as directly to consumers.

Vestey had a global turnover in 2018 of £535m and have over 988 employees worldwide.

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OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Vestey operate a number of policies at individual subsidiary company level, such as: Procurement, Corporate Social responsibility (CSR), Environmental and Health and Safety policies. These are all signed off at company director level.

The CSR Policy states that we will not tolerate or condone abuse of Human Rights or Modern Slavery within any part of our business or supply chain, and will take seriously any allegations that Human Rights are not properly respected. All reports will be investigated and appropriate remedial action will be taken.

We have strengthened our standard supplier contractual terms, this sets out the standards required of our suppliers and adds extra due diligence to ensure compliance to the Modern Slavery Act.

We maintain rigid supplier approval programmes to validate that all our suppliers and service providers meet our criteria before they can be classed as 'Approved'. Specifically, third party certification and risk based Vestey audits are fundamental in ensuring products conform to local legislation, whilst also assessing our suppliers' suitability.

In accordance with our recruitment policy, we conduct eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Vestey Holdings and its subsidiaries have introduced a whistleblowing policy. This ensures all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Every company adheres to the Group's ethics policy which sets out how we conduct ourselves as an organisation, and how we behave when dealing with customers and suppliers. This sets out that adherence to Human Rights issues is a key consideration when considering a business partner.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Vestey have strong technical and procurement teams in each Group company supporting all aspects of our business. Our trained technical auditors are highly qualified with many years' experience, and conduct risk based second party audits, as required.

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We understand that our biggest exposure to Modern Slavery is in our product supply chains, and therefore we are focussing our effort here. All our suppliers are subject to pre-approval and this is, amongst other things, will help to identify any modern slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

Audits are conducted with many suppliers and include the verification of modern slavery. Suppliers are required to:

- Participate in audits.
- Provide employees with good working conditions, fair treatment and reasonable rates of pay.
- Respect workers' Human Rights and comply fully with all applicable laws.

All of which is designed to ensure that:

- All work is voluntary, and not done under any threat of penalties or sanctions.
- Workers have not paid any deposits for work, and employers have not kept original copies of identity documents.
- Workers are free to leave work at any time, with all salary that is owed paid.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- they comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force but not limited to the Modern Slavery Act 2015
- and maintain throughout the term of this agreement their own policies and procedures to ensure compliance; and
- they will not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK; and
- they will ensure that each of their subcontractors and suppliers shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015.

TRAINING

To ensure a level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide appropriate instructions to our commercial, technical and procurement teams.

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OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We aim to frequently assess our Anti-Slavery policy to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

If we discover a violation of our Anti-Slavery policy, we will respond in a manner proportionate to the nature and extent of the violation. Serious violations will require immediate and decisive action and may result in the termination of the business relationship.

For less serious violations, we will allow the supplier reasonable time to develop and implement a plan for remediation. We will treat termination as a last resort as it is unlikely to resolve the underlying issue and it may be detrimental to those people who rely on the work to survive.

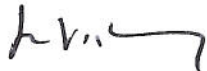
FURTHER STEPS

Following a review of the effectiveness of the steps we have taken and to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following additional steps to combat slavery and human trafficking in 2019:

- Ensure that best practice modern slavery and other related policies that are in place in individual subsidiary companies are introduced into all Group companies;
- Formally seek confirmation from suppliers that they are in compliance with anti-slavery and human trafficking laws.
- Update all documented Business and Quality Management System (MBS and QMS) that underpin ISO and BRC accreditations to ensure that they reflect the requirements of the Modern Slavery Act; and
- Continue to raise awareness internally of the issues surrounding Modern Slavery and provide appropriate instructions to all employees.

This statement was approved by the Board of Vestey Holdings Limited.

Signed



.....
George Vestey
Chief Executive Officer.

Appendix A – Vestey Holdings Limited subsidiary companies covered by this statement

Vestey Foods Limited

Vestey Foods UK Limited

Vestey Foods International Limited

VFI Worldwide Limited

Friendship Foods Limited

Donald Russell Limited

Cottage Delight Limited

Albion Fine Foods Limited

TecFoods Limited

Global Group UK Holdings Limited

Western Pension Solutions Limited

K3 Advisory Limited

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