

# POLICY

## POL.09.01 Modern Slavery Policy

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Northumbrian Fine Foods has a zero-tolerance approach to all forms of modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships.

### **Aims of this policy**

This policy explains the Company's commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other form of business relationship.

This policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, volunteers, interns, contractors, consultants and any other third-party representative.

We expect all who have or seek to have a business relationship with Northumbrian Fine Foods to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy.

This policy will be used to underpin and inform any statement on Slavery and Human Trafficking that we produce further to the transparency in supply chain requirements of section 54 of the Modern Slavery Act (MAS) 2015.

### **What do we mean by modern slavery?**

Modern slavery can take many forms. It is a complex and multi-faceted crime. The MSA 2015 covers four key activities:

- Slavery: ownership is exercised over an individual
- Servitude: involves the obligation to provide services imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA 2015 include, but are not limited to:

Child labour: involved the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

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Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

### **How we seek to embed our anti-slavery policy in practice**

To underpin our policy commitments, we are in the process of implementing the following measures over the next 2 years.

- We will conduct regular risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery so we can focus our efforts on those areas most 'at risk'.
- Where appropriate, as informed by our risk assessments, we will undertake pre-screening of prospective suppliers as part of our tender processes in relation to the effectiveness of their existing safeguarding controls and practices including, but not limited to those in relation to preventing modern slavery occurring within their organisation.
- Where appropriate, as informed by our risk assessment, we will engage directly with suppliers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains, and, where appropriate, agree how such measures should be enhanced.

### **Responsibility for this policy**

The Managing Director has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The Head of People will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All members of the Senior Leadership Team members are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles. SLT Members

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### Breaches of this policy

Any breaches of this policy will be taken seriously and dealt with on a case-by-case basis.

The breach of this policy by an employee, director or officer of the Company may lead to disciplinary action being taken. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal in accordance with our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from HR.

### Status of this policy

This policy does not give contractual rights to employees. The Company reserves the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

<p><b>Approved by</b> Neil McAndry</p> <p><b>Job Title</b> Managing Director</p>	<p>Signature:  Date: 27/9/22</p>
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