

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 2022, and continue to take, to prevent modern slavery and human trafficking in its business and supply chain. See Appendix A for the UK subsidiary companies covered by this statement.

OUR BUSINESS & SUPPLY CHAINS

Vestey specialises 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 has two pension advisory businesses.

Our headquarters are in Coulsdon, United Kingdom and in 2022 operated from offices in the UK, France, Denmark, Norway, Belgium, Lithuania, Spain, Poland, Dubai, Oman, the Philippines, 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 2022 of £696m and over 1,026 employees worldwide. In Q3 2022, Vestey appointed a Group Head of Sustainability, with part of the remit of the role being to review, refine and strengthen our approach and work on prevention of Modern Slavery both within our own operations and in our value chains.

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.

Vestey operate a number of policies at individual subsidiary company level, such as: Procurement, Corporate Social Responsibility (CSR), Ethics, Anti-Bribery, Corporate Gift, 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.

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Registered in England
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We maintain rigid supplier approval programs 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.

These policies are available to employees via the Group Intranet and subsidiary companies' policy banks.

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 conduct risk-based second-party audits, as required.

We understand that our exposure to Modern Slavery is within our own operations but more so within our product supply chains, and therefore we are focusing our effort in these areas. 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 the suppliers' approach to preventing forced labour and modern slavery. Suppliers are required to:

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

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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; and
- 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;
- 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, recruiters and line managers.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

If we discover an indicator of forced labour, we will respond in a manner proportionate to the nature and extent of the situation. Serious incidents will require immediate and decisive action and may result in the termination of the business relationship.

For less serious incidents, 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.

There were no indicators of forced labour, slavery or human trafficking identified in 2022.

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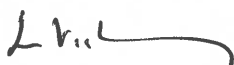
FURTHER STEPS

We will continue to review the effectiveness of the steps we have taken in prior years and to ensure that there is no slavery or human trafficking in our supply chains we will implement the following in 2023:

- Review the Group and subsidiary company approach to Modern Slavery in the operating business and value chains.
- Review and update Group policies with reference to best practice and cascade to all Group companies.
- Collaborate with peers in industry forums to learn from others and effect greater impact.
- Continue to formally seek confirmation and evidence from suppliers that they are following international conventions, national laws and Vestey requirements.
- Continue to raise awareness internally of the issues surrounding Modern Slavery and provide appropriate instructions to all relevant and interested employees.

This statement was approved by the Board of Vestey Holdings Limited on 18th May 2023.

Signed



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George Vestey
Chief Executive Officer.

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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
Donald Russell Limited
Cottage Delight Limited
Albion Fine Foods Limited
WISK Holdings Limited
Global Group UK Holdings Limited
Western Pension Solutions Limited
K3 Advisory Limited
Coolcare Logistics Limited

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