

Modern Day Slavery and Ethical Trading Statement

Introduction

This statement sets out Kanes Foods Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018

We are aware of the modern slavery risks and acknowledge responsibility to the Modern Slavery Act 2015. Kanes is committed to establishing an action plan to eradicate acts of slavery and human trafficking from our own business and from within our supply chain.

As part of the Food & Beverage manufacturing sector, the organisation recognises that it has a responsibility to take a robust approach to these issues. The organisation is absolutely committed to preventing modern slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking and that we trade ethically with our supply chain partners.

About Us

This statement covers the activities of Kanes Foods Ltd

- Kanes has been supplying prepared fresh produce in the UK for almost 30 years. We manufacture from 5 factories on a 28 acre site in Worcestershire.
- Kanes produces multiple types of prepared fresh produces in a variety of packaging formats and sizes, including salads & dressed salads, stir fry vegetables & prepared vegetables, fresh egg noodles, dressing & sauces.
- We supply to the UK retail, wholesale and foodservice market.
- We remain a family business with very strong values for our people, our customers, our suppliers and our environment. Our manufacturing footprint, substantial research and development capability and high-level of quality and customer service enables Kanes to offer its customers a strong value-added proposition of high quality products and services.



Policies & Processes relating to Ethical Trading, Slavery and Human Trafficking

The relevant leaders of the HR, Technical, Purchasing and Operations functions are responsible for the implementation, development and on-going maintenance of the policy within their respective business units.

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Human Resources department is responsible for putting in place and reviewing policies in relation to anti-slavery. These policies were drawn up in consultation with external legal counsel, applying the principles and protocols of Stronger 2gether.
- **Sedex:** Kanes is a member of Sedex (Supplier Ethical Data Exchange) which is a web-based system for suppliers to share ethical trading information with their customers. We expect all our suppliers to have ethical processes and policies in place throughout their supply chain and manufacturing operations. As part of our commitment to ethical trading all our suppliers are requested to register with Sedex. We will monitor supplier compliance with this policy through the Sedex platform (where applicable) and /or through a range of other tools to support the risk management including the requirement for suppliers to provide reasonable information as evidence of compliance to the Modern Day Slavery Act and the ETI Base Code.
- **SMETA Audit:** Kanes complies with the SEDEX members ethical trading audit's measurement criteria and implements best practice guidelines on Anti-Slavery provisions including employment is freely chosen, child labour & young workers and discrimination-free working practices.
- **ETI Base code:** Kanes is an ETI member (Ethical Trading Initiative) and is compliant with the ETI Base Code, which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.
- **Risk assessments:** We will assess all our suppliers through robust risk-based systems and then monitor them accordingly. Our assessment tools will determine the level of risk posed by each supplier, with the highest risk supplier sites being required to regularly demonstrate compliance.
- **Investigations/due diligence:** Technical Audit, Purchasing, HR and Operations are responsible for any investigations, due diligence and corrective actions.
- **Training:** Key personnel, including managers, supervisors and recruiters will receive appropriate training for MDS and Ethical Trading.

Support and Development

- We are committed to providing guidance and support, where and when appropriate, for our colleagues and suppliers to identify and resolve modern slavery, human trafficking and ethical issues. We encourage and support continuous improvement in supplier standards and we regularly measure supplier improvement.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy.** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct.** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct.** We impress upon our suppliers the high level of Supplier/Procurement code of conduct we expect from them in order for our relationship to commence and develop. We seek to develop long-term relationships with our suppliers based on the principles of fair, open and honest dealings at all times. Only suppliers that share these principles and can demonstrate compliance to ethical standards will be considered appropriate to trade with Kanes Foods.
- **Recruitment/Agency workers policy.** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Kanes carries out twice yearly audit questionnaires on every agency worker and also randomly selects individual workers for interview.



Due diligence & Risk Mitigation.

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular participation in "Stronger together" or "Ethical trading" initiatives;
- using SEDEX, SMETA, ETI Base Code and Kanes Audits where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.

Higher Risk Areas:

Seasonal workers and external labour providers have been identified as areas of higher risk and we look to mitigate these risks by:

- Recruiting directly
- Structured induction and training processes
- Tender process for the selection of external recruitment agencies
- Audit and approval of all external agencies
- Service Level Agreements in place with all external agencies



Awareness-raising programme

The organisation will raise awareness of modern slavery issues by distributing flyers to staff, putting up posters across the organisations premises and circulating a series of emails to staff.

The flyers/posters/emails will explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline.

This statement has been approved by Steve Corby, Company CEO, who will review and update it annually.