



Modern Slavery Statement June 2020

Introduction

Modern slavery is a rapidly growing global concern. In today's world there are many people living under conditions of forced labour, slavery, servitude, and human trafficking. Modern slavery affects all business sectors and global regions. Pilgrim Foodservice Ltd is committed to ensuring all possible measures are taken to eliminate modern slavery within our business and supply chain. Our staff are encouraged to report any concerns through safe and confidential channels so senior management can then act on them.

This is Pilgrim Foodservice's second modern slavery statement and it is published in adherence to the Modern Slavery Act 2015. The purpose of this statement is to demonstrate the steps taken and implemented by Pilgrim Foodservice Ltd to prevent modern slavery and human trafficking in any form within our business or our supply chain in the financial year ended April 4, 2020.

The statement has been written with reference to the points listed in the Ethical Trading Initiative's modern slavery statements framework for evaluation. ⁽¹⁾

Structure, Business and Supply Chain

Pilgrim Foodservice Ltd is a family run business, supplying food outlets, restaurants and leading foodservice suppliers. We manufacture fresh prepared vegetables and butchery products, as well as supplying a wide range of chilled, frozen, ambient, cleaning and disposable goods. We are members of Caterforce and the British Frozen Food Federation.

Modern slavery is the responsibility of everyone in the business with HR and the Managing Director being ultimately responsible for internal practices and Procurement and Technical/CSR for our supply chains.

We are aware how our behavior has an impact on our people, the environment and the success of our business and around this we have created our four core values:

- Innovation
- Respect
- Integrity
- Trust



We apply these values to all areas of the business including the eradication of modern slavery in our supply chains and on our site.

Pilgrim Foodservice operates from one site in Boston, Lincolnshire and serves the neighbouring counties and into London.

There are 250 permanent team members on site comprising of office workers, warehouse and production operatives and drivers. We used local labour agencies at our peak time around Christmas 2019 to boost the workforce. Our labour agencies are all registered with the Gangmasters Labour Abuse Authority (GLAA).

We use third party service providers and contractors to maintain and repair site infrastructure including, but not limited to, manual handling equipment, delivery vehicles, high level cleaning, racking inspections and building and fabrication maintenance/repairs. Third party providers are known to the company and approved to site from a safe systems of work perspective. Last year we held no information regarding their compliance to modern slavery but we have now started to build up a picture of their supply chains and processes. This work will continue throughout the following year until it has been completed with all our service providers and contractors.

Pilgrim Foodservice uses a wide range of suppliers through the business from local farmers to global companies. All first-tier suppliers are known and approved to site before supply can commence. Last year second tier suppliers and beyond were only known where we were sourcing from another wholesaler or companies that use several manufacturing sites outside their company. We are now starting to look at their suppliers with the intention of building up a complete map of our supply chain.

We are aware that the Covid-19 pandemic has had a massive impact on the economy, and will continue to do so, and we will be continually assessing our suppliers and service providers to ensure there are no instances of modern slavery within our supply chains.

Policies in Relation to Slavery & Human Trafficking

Pilgrim Foodservice Ltd operates under our strict HR and Sourcing Policies. These policies are based on the Modern Slavery Act and use the resources available through the Stronger2gether website; <https://www.stronger2gether.org/>.

We are committed to ensuring all team members, new or existing, are not subject to threats that may amount to modern slavery or forced labour.

We take care to recruit and treat all team members in a fair, professional and lawful manner. To ensure we avoid modern slavery our experienced internal talent acquisition team advertise roles internally and externally and we only use reputable external labour agencies. We are fully committed to the following:

- ✓ Fair and consistent advertising, criteria for shortlisting & practices for selection
- ✓ We check documents to ensure new team members have the right to work in the UK; i.e. passport, UK birth or adoption certificate, work permit, and any other relevant documentation required to evidence right to work
- ✓ When employing young, inexperienced and other new team members they all receive the same rights
- ✓ We do not employ anyone considered to be 'child labour'
- ✓ Provide induction to new team members which includes health and safety training
- ✓ Provide team members with holiday entitlement above that required by statute
- ✓ Provide fair and reasonable pay which is never below national minimum wage
- ✓ Provide benefits

- ✓ Provide appropriate break/rest time
- ✓ Provide statutory sick pay if eligible
- ✓ Provide a grievance procedure if team members believe they are being treated unfairly or have other issues or concerns they wish to raise
- ✓ Provide fair and safe working conditions
- ✓ Forced labour is strictly prohibited
- ✓ When a team member leaves our business, we manage their exit in a fair and consistent manner which includes a documented exit interview

All team members are given access to the Company Handbook which details everything an employee needs to know to be able to work for Pilgrim Foodservice. The Handbook is kept electronically within the Quality Management System (QMS). The QMS system also contains all policies relating to HR and the other areas of the business. Training is given to everyone in the use of the QMS system and policies are enforced by the use of audits and daily communications. Everyone has read only access to the QMS and Technical have full control to edit and control document versions. Documents are owned by department managers who are encouraged to develop their own policies and procedures. Final sign-off and issue lies with the Technical department.

We are in the process of over-hauling our QMS system and documents will be department based rather than people owned. Sign-off will still lie with Technical but, to encourage use and develop ease of access, all documents will be condensed and be more concise and user-friendly with more emphasis on allergens and health and safety. We do not foresee a change to the quality of information or removal of key information.

Our other policies relating to modern slavery and the areas they cover include:

- Control of Contractors – methods of safe working, health & safety
- HR Operating Procedure – all areas of HR (job profiles, staff facilities, personal data, recruitment, inductions, exits, training, absence & medical management, personal hygiene and grievance)
- Product, Supplier Management & Procurement – supply chain
- Health & Safety Operating Procedure
- Employee Medical Questionnaire – captures any existing medical conditions
- Equal Opportunity Monitoring Form
- Working Time Directive opt out Agreement – gives team members the right to decide to limit their working hours
- Pilgrim Foodservice Employee GDPR – explains how we treat employee's personal data
- Modern Slavery Policy – this includes a recruitment checklist for modern slavery

Last year we intended to conduct a gap analysis of the HR policies against the ETI base code and develop existing policies or write new ones to ensure all areas are covered. We have not achieved this yet but as part of the QMS re-write this will be covered. We began the process of the re-write with operational documentation and policies to ensure the health and safety of our highest risk staff was covered first.

Our team members are made aware of the company’s modern slavery policy and we identify if there is any likelihood of slavery existing within the company’s operation. Our talent acquisition team and those team members who work with agency workers can recognise modern slavery and know what to do if they suspect its presence. We recognise that some people may not understand they have been exploited and our HR team members will be looking out for the following signs to help identify potential slavery:

1. The person may not be in possession of their own passport, birth certificates or other relevant documents
2. The person may act as though they are being instructed or coached by someone else
3. They may allow other colleagues to speak for them when addressed directly
4. They may be dropped off and collected from work
5. The person may appear withdrawn or frightened
6. The person may be unable to contact friends or family freely
7. The person may have limited social interaction or contact with people outside their immediate environment

This list is not exhaustive.

Our payroll process is outsourced to a reputable business who are aware of their obligations with regard to the Modern Slavery Act 2015.

To maintain awareness and ensure a high level of understanding of the risks of modern slavery within the Company our Modern Slavery Policy is available to all team members.

Risk Assessment, Prevention & Mitigation

Our supply chain is being risk assessed against The Global Slavery Index 2018 (GSI). The risk assessment has been based on the top 5 imported products to the UK at risk of modern slavery.⁽²⁾ Changes have been made since last year against the information from the GSI “G20 Leaders in Consumption” information⁽³⁾; these are electronics moving from second to the top at risk product and garments moving down from the top to second. Rice is the 5th most at risk product for importing to the UK but the information from the GSI “G20 Leaders in Consumption” includes sugarcane at number 5. Therefore, we have added sugarcane to our at-risk register giving us 6 products to monitor closely and prioritise the supply chain mapping. These are detailed below with the at-risk countries and examples used in our business.

1) Electronics

- office equipment
- food production equipment



2) Garments

- food production clothing
- table ware (cloths, napkins etc)

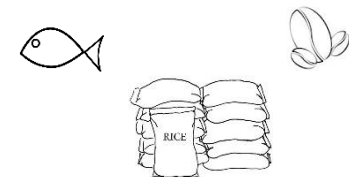


3) Fish

4) Cocoa

5) Rice

} All supplied into our warehouse



6) Sugarcane (sugar)



At-risk countries:

China	India	Vietnam	Thailand
Malaysia	Brazil	Argentina	Ghana
Russia	Indonesia	Japan	South Korea
Taiwan	Cote d’Ivoire	Myanmar	

Supply chain mapping has started and we are in the process of building our “at-risk” register detailing the information from the Global Slavery Index (above) against our products and services.

Internal practices and policies; i.e. employment and recruitment, use of agencies for temporary labour and employees’ contracts; still require assessing against the at-risk

countries but this has been placed on hold pending the QMS re-write and the impact of furlough and return to work from the Covid-19 pandemic.

Risk assessments surrounding the sourcing of products, and the modern slavery policies being written against them, are managed by our Technical department whereas internal practices and policies are managed by the HR department. All practices are considered and included into the Modern Slavery Statement.

Due Diligence Processes

We periodically audit our recruitment and induction process to ensure we are not accepting or enabling modern slavery on site. We do expect any labour agency whom we deal with, to be free from ethical ambiguities and be accountable for their compliance to the Modern Slavery Act 2015. If we have reason to believe any agency has failed to meet these standards, they will be removed from our preferred supplier list and the Human Resources Director will consider an appropriate course of action which may include contacting the police or the Gangmasters Labour Abuse Authority (GLAA).

Our company has introduced a new role to specifically deal with corporate social responsibility and this includes the topic of modern slavery within the supply chain.

Following the risk assessments of suppliers, see previous section, any instances found of modern slavery in the supply chain shall be communicated to the first tier supplier and they will be given chance to work with us to determine a plan to eradicate it. Any supplier that fails or ignores the issue will be reported to the authorities and delisted from our approved supplier list.

Any team members, permanent or temporary, that are being affected by modern slavery may speak to any manager on site and / or the HR department. Permanent members can also utilise the confidential helpline, that has been set up by Pilgrim Foodservice, to speak to an independent third party.

Modern slavery risk, mitigation and methods of dealing with occurrences are currently being captured in existing policies and procedures.

At the time of writing this statement Pilgrim Foodservice has identified no instances of modern slavery on our site or within our supply chain from the work already carried out. We will continue to work with suppliers and agencies to monitor the situation.

Effectiveness, Measured Against Appropriate KPIs

Pilgrim Foodservice uses KPIs (Key Performance Indicators) to measure the performance of our business.

Currently the KPIs in place cover food safety, product recalls and withdrawals and customer service. It is our intention to build a set of KPIs measuring compliance to our vision of “verifiable zero slavery” in our supply chains for products and recruitment methods for people.

KPIs specific to modern slavery have been built and consist of the following:

- Mapping and knowledge of the supply chain for products and service providers at any one time
 - Target >= 99.90%
- Training of internal auditors and field sales to recognise the signs of modern slavery and how to deal with it and report it
 - Target >= 99.95%
- Auditing &/or traceability exercises of high-risk suppliers
 - Target >= 99.95%

The targets are marginally below 100% to allow for changes in suppliers, new staff starting work and unplanned delays in trace exercises / audits. These are all subject to review at any time.

Updates on modern slavery have been added to the monthly board reports and graphs / tables are being prepared to detail KPIs.

Any existing KPIs would not encourage modern slavery on our site as they are all based on the quality and safety of the food produced and error free order picking rather than the quantity of food made or number of orders picked.

Training and Capacity Building

There are numerous plans in use on site for role specific training i.e. accepting goods onto site, order picking and vehicle loading. Other general training for all staff includes things like food safety and health and safety. Team members are encouraged to volunteer for further training in first aid and fire safety to obtain recognised qualifications and subsequently hold these positions on site.

Our HR and recruitment departments have received training in recognising the signs of modern slavery and how to deal with it. Department managers are aware of the reporting process if they suspect modern slavery within their departments.

We alert all new team members to our modern slavery policy and incorporate it into their induction pack. There are up to date copies kept on notice boards in canteen areas for team members to refer to.

Further training for internal auditors and field sales teams has not yet been completed but rescheduled for end 2020/early 2021. Posters have been placed on notice boards in canteens explaining modern slavery and how to report it and if face-to-face training cannot be conducted, these and further information will be placed into a presentation pack and circulated to the auditors and sales teams.

Next Steps and Our Commitment

The next steps for Pilgrim Foodservice are based on the findings above but are not limited to the following;

- Continued supply chain mapping and monitoring of our suppliers and service providers
- Training and staff awareness campaigns carried over from 2019/20
- Addition of sugarcane to our at-risk register as a high-risk commodity
- Further KPI reporting and monitoring

- Developing supplier relationships
- Auditing and/or traceability exercises on higher risk suppliers
- Ongoing risk assessments

- ✓ We commit to working with experts internally and externally to review and audit our policies ensuring all and any risk is identified.
- ✓ We commit to using the results of these audits at senior level to shape and drive our policies ensuring every member of our business has a clear understanding of these policies and expected behaviours.

This statement has been approved & signed by
Charles J Bateman
Managing Director
Pilgrim Foodservice Ltd
June 2020

References

⁽¹⁾ Ethical Trading Initiative Modern Slavery Statements; A Framework for Evaluation
https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Framework%20MSS%20Evaluation_v8_for%20publication.pdf

⁽²⁾ Global Slavery Index 2018 - UK top 5 imports at risk;
<https://www.globalslaveryindex.org/2018/data/maps/importing-risk/united-kingdom/>

⁽³⁾ Global Slavery Index G20 Leaders in Consumption page iv.
https://downloads.globalslaveryindex.org/ephemeral/GSI-2018_FNL_190828_CO_DIGITAL_P-1592909755.pdf