



Modern Slavery Statement April 2023

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 fifth 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 5, 2023.

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 foodservice outlets, i.e., bars and restaurants, the care sector, 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 a larger group called Caterforce.

Modern slavery is the responsibility of everyone in the business with HR and the Managing Director being ultimately responsible for internal practices and Procurement, Buying and Technical 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 just over 250 permanent full and part time team members on site comprising of office workers, warehouse staff, production operatives and drivers. We use local labour agencies at our peak times, i.e., around Christmas, to boost the workforce. We ensure all labour agencies used are 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 is still ongoing from last year but will be continued 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. Following from last year's work surrounding second-tier suppliers we have built a new section into our supplier approval questionnaire that gives suppliers the opportunity to enter the details of their supply chain before they are approved to supply to our site. Our work with pre-existing suppliers is still ongoing and will be continued until it is completed.

We are aware that Brexit and the Covid-19 pandemic have 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
- ✓ Ask new team members if they have their own bank account for receipt of their pay and request details
- ✓ 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.

Following on from last year's work on the QMS, the system and documents are now department based rather than people owned. Sign-off still lies with Technical but, to encourage use and develop ease of access, all documents have been condensed and are more concise and user-friendly with more emphasis on allergens and health and safety. There have been no changes 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

Whistleblowing Policy – this gives employees the opportunity to anonymously report instances of misconduct and corruption within the business

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 and is still ongoing. 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 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⁾; the electronics sector being broken down specifically to focus on laptops, computers, and mobile phones. 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. These are detailed below with the at-risk countries and examples used in our business. There have been no changes in supply over the past year and suppliers have been risk assessed as low or medium risk. The GSI is checked annually to ensure it has not been updated.

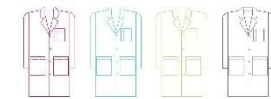
1) Electronics

- office equipment (laptops, computers, mobile phones)
- food processing machinery



2) Garments

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

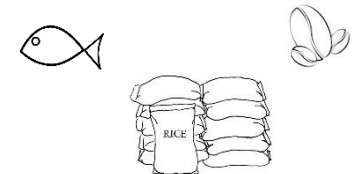


3) Fish

4) Cocoa

5) Rice

} All supplied into our warehouse



6) Sugarcane (sugar*)



*The UK sugar industry is supplied from raw sugar extracted from sugar cane and partly processed in the originating country cane mills.

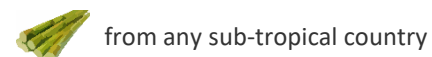
At-risk countries by sector:



China
Malaysia



Cote d'Ivoire
Ghana



Our “at-risk” register detailing the information from the Global Slavery Index (above) against our products and services is being incorporated into the supplier approval register so it will be picked up as part of the review process covered under the section we have titled “Ethical Trading”. New supplier approvals and ongoing supplier reviews include an online check to verify they have not been incriminated in, or accused of, offences relating to modern slavery.

Internal practices and policies, e.g., employment and recruitment, use of agencies for temporary labour and employees’ contracts; still require assessing against the at-risk countries and will be completed over the next financial year.

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).

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. Team 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, contractors and other 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. These would not encourage modern slavery 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.

Our KPI specific to modern slavery is:

- Auditing &/or traceability exercises of suppliers with a high-risk of modern slavery occurring in their supply chains

- Target >= 99.95%

The target is marginally below 100% to allow for changes in suppliers and unplanned delays in trace exercises / audits. This is subject to review at any time.

Any updates on modern slavery or instances of occurrence will be added to the monthly technical board report for the Board of Directors to review.

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 internal auditing, HACCP, 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. Posters have also been placed on notice boards in canteens explaining modern slavery and how to report it to increase staff awareness of modern slavery.

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 monitoring of suppliers and service providers

- Supplier reviews ongoing dependant on risk and now including ethical trading as part of the risk assessment – completed end Apr 2021
- Revised questionnaires to be sent to all new suppliers giving them the change to detail their supply chain – completed end Apr 2021
- Staff awareness campaigns
- 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
April 2023

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.globallslaveryindex.org/2018/data/maps/importing-risk/united-kingdom/>
- ⁽³⁾ Global Slavery Index G20 Leaders in Consumption page vi
<https://www.globallslaveryindex.org/resources/downloads/>