



# MODERN SLAVERY STATEMENT

Financial year 2023 to 2024

# CONTENTS

Page 2	Introduction: Company commitment and pledge
Page 2-3	Our business and supply chains
Page 4	Due diligence procedures
Page 4	Monitoring and remedial action
Page 5	Plans going forward

This statement has been issued in accordance with the Modern Slavery Act 2015 and covers Bidfresh Limited. It has been considered and approved by the Bidfresh Board of Directors. This statement demonstrates our commitment to ethical trading, tackling modern slavery and the steps being taken to increase transparency within our supply chain and our own operations

# 1

## Introduction: Company commitment and pledge



Modern slavery is an overarching term used to describe its various forms.

- ❑ Human trafficking process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.
- ❑ Forced and compulsory labour work or services which people are not doing voluntarily and which is exacted under a threat of some form of punishment.
- ❑ Bonded labour demanded as a means of repayment of a debt or a loan.
- ❑ Slavery a situation where a person exercises (perceived) power of ownership over another person.

At Bidfresh, we recognise that modern slavery is a crime that can take many forms; we have a zero-tolerance approach to modern slavery within our own business, with our suppliers of agency labour, and in dealings with our food and non-food product suppliers. We are committed to putting effective systems and controls in place to safeguard against any form of modern slavery within our business and our supply chains and strive to achieve the following:

- ❑ Recognise workers' rights.
- ❑ Attain maximum supply chain transparency.
- ❑ Work with others to address risks of slavery in their supply chains.

# 2

## Our business and supply chains

Bidfresh is a specialist fresh food supplier with a decentralised model of management encouraging the entrepreneurial spirit contained in each of its businesses. Our fishmongers, greengrocers and butchery businesses retain their local brand, tone of voice, look, and feel. However, many of the back-office functions - including ethical trade and food safety - are centralised. We currently hold 10 sites and 13 brands across the UK, supplying to chefs and caterers. A full list of our businesses and brands can be found on our website

[www.bidfresh.co.uk](http://www.bidfresh.co.uk)



The majority of our tier 1 suppliers are UK-based, which reflects a priority to source fresh, locally, and seasonally wherever possible. However, we also have a number of imported products; for example seasonal produce, prawns, tuna and beef that are sourced from EU and overseas. The supply chain structures within Bidfresh vary depending on the business division. For example, a complicated fish supply chain may involve vessels who engage in transshipment, offload to a freezer or cannery, and then ship overseas to one of our depots; whereas a complicated meat supply chain may include different farms for breeding and rearing, before transferring to abattoirs and then on to be packed and shipped to the UK. In more simple cases, we purchase directly from local farmers or fish markets in the UK. All of the different stages in supply chains may have different human rights issues associated with them.



## Employee conduct and ethics

We have robust people policies and standards in place to ensure compliance with legislation and fundamental rights at work including; freedom of association, dignity at work and prevention of discrimination throughout employment.

In line with our vision, our People Policies show our commitments to our employees.

We believe honesty and fairness are key.

### Our commitment to our employees includes:

#### □ Equal opportunities:

We make sure there are equal opportunities in all areas of recruitment, development, reward and career progression.

#### □ Having a voice:

We believe two-way communication is crucial for business success, so will provide briefings on company progress and regular opportunities for feedback on views and suggestions for improvement.

#### □ Health & wellbeing:

We work with our employees to help maintain personal health and safety at work, and offer employee benefits that add value.

#### □ Fulfilling potential:

We are committed to developing skills so our people can reach their full potential, as we recognise the importance of developing future talent for the sustainability of our business.



# 3

## Due diligence

We're committed to working with our suppliers to operate ethically, and to build greater transparency within our supply chains. We aim to act dutifully and always within the law and regulations in the UK. As a minimum we expect all suppliers to comply with our ethical code of conduct (Ethical Trading Policy) which is based on the principles of the Ethical Trading Initiative (ETI) and relevant International Labour Organisation (ILO) standards and conventions. Suppliers must also comply with national and international laws.

Prior to trading, all suppliers undergo a thorough supplier approval process, which now includes submission of ethical information via Sedex.

# 4

## Monitoring and remedial action

### Within our business

Our employees may be the first people who realise that there could be problems within the business. Our Whistleblowing Standard aims to encourage and enable our employees to raise serious concerns through approved channels rather than overlooking a problem.

We have a 24-hour whistleblowing hotline that anyone can call and this is well advertised across all Bidfresh sites. Our whistleblowing procedure is designed to make it easy for anyone to make disclosures.

### Within our supply chains

We have successfully established relationships on the Sedex platform with a large number of our Tier 1 food suppliers. We are reviewing this information on an ongoing basis. We will further evaluate any suppliers identified from the risk assessment as high risk.

Any suppliers that are implicated in the media as associated with modern slavery issues will be subject to a full investigation to address any potential issues.

Failure by a supplier to meet our standards may jeopardise their ability to continue to do business with us and are addressed on a case-by-case basis. If, following an in-depth investigation, the supplier falls short of our expectations and standards in relation Bidfresh's Ethical Trading Policy and due diligence process, we will cease trading with that supplier.

If modern slavery or human trafficking is identified within our supply chain, appropriate investigations will be conducted internally and the relevant authorities contacted.

Tackling modern slavery remains a top priority for us. We aim to strengthen our understanding of modern slavery within the business and supply chain and implement effective controls to mitigate it. To that end, for example, we are members of The Seafood Ethics Action Alliance and work alongside other businesses within the seafood industry with the aim to improve conditions for workers within seafood supply chains.

[Home - SEAA - The Seafood Ethics Action Alliance](#) ▶



### Within our business

Our current processes and procedures have led us to assess the level of risk of modern slavery and exploitation within our operations to be generally low.

In the financial year 2024 – 2025 we aim to fully review our training and awareness of Modern Slavery across the group, ensuring the training and awareness we provide is relevant to people's rolls.

### Within our supply chains

In the financial year 2024 - 2025, we aim to continue our commitment to supply chain mapping.

We will aim to:

- Ensure we have established relationships with all our Tier 1 food suppliers via Sedex to ensure robust risk reporting by June 2025.
- Begin to map the Tier 2 food suppliers within our supply chain, establish relationships and begin the risk assessment process.
- Begin completing the same processes with our non-food suppliers.



To date, no modern slavery has been identified in our internal operations nor are we aware from our audit and verification processes of any in our supply chains. We will continue to monitor the effectiveness of our existing controls internally, and review annually what improvements may be made to strengthen our auditing and verification procedures.

## Supporting the principles and standards of:

Ethical Trade Initiative International Labour Organisation

UK Gangmasters and Labour Abuse Authority

This statement has been approved by the Bidfresh UK Senior Leadership Team and will be reviewed annually.