



Modern Slavery Statement

Introduction

This statement is issued by Fresh Direct (UK) Limited (trading as Fresh Direct, Fresh Kitchen, M&J Fresh Seafood, Carver & Co., Wild Harvest and Roots) ("Fresh Direct").

Fresh Direct is a leading specialist supplier to the foodservice industry of products including fresh produce, dairy, fish & seafood, meat, and poultry. We employ around 1100 employees across the UK. We are part of the Sysco Corporation, the global leader in foodservice.

Fresh Direct is fully committed to ethical working practices, and regards inhumane conditions such as slavery, worker exploitation, and human trafficking as completely unacceptable either within our own business or in our supply chains.

Given our global reach, we understand our responsibilities and have a zero-tolerance approach to modern slavery. We recognise that modern slavery is a crime which can take many forms. We strive to act ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place in our own business or in our supply chains.

Our suppliers are required to adhere to the Sysco Supplier Code of Conduct (<https://sysco.com/Suppliers/Supplier-Partnerships/Supplier-Resources.html>) which sets out our organisational values in relation to human rights. All Sysco colleagues are required to adhere to the Sysco Global Code of Conduct, which sets out our commitment to the principles of the UN Global Compact and the Universal Declaration of Human Rights, and are required to complete mandatory Code of Conduct training.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our Board fully supports the aims of the Act and is committed to combatting the risk of slavery and human trafficking in our business.

Our Supply Chain

Whilst many of the products sold by the Fresh Direct are sourced from the UK, we also source globally to support the range, quality, provenance, availability, and price requirements of our customers.

Prevention of slavery and human trafficking in Fresh Direct's workforce

Right to Work Checks

All colleagues employed by Fresh Direct who work on a temporary, fixed term or permanent basis are subject to a right to work check in accordance with UK legislation. A person is unable to commence work for Fresh Direct unless they satisfy us that they are legally able to work within the UK.

Resourcing

Where Fresh Direct employs the services of an employment agency to source candidates for permanent or fixed term positions, we endeavour to only use agencies of good repute and who are listed on our preferred supplier list. Fresh Direct requires the agencies to undertake the appropriate background checks on prospective colleagues, in conjunction with our own checks.

Agency Workers

Where Fresh Direct uses temporary workers supplied through an employment agency, we require the agency to undertake the appropriate background checks on the agency worker. We operate a preferred supplier list for these agencies and those listed are required to comply with our Ethical Code of Conduct, which incorporates compliance with the Modern Slavery Act and other critical legislation.

If Fresh Direct identifies that an employment agency is not adhering to our standards, the agency is removed from the preferred supplier list and is not engaged in any further recruitment activity.

Whistleblowing policy

Fresh Direct has a whistleblowing policy in place under Sysco's Global Code of Conduct, which applies to all employees, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers, or any other person associated with Fresh Direct. Any colleague who has concerns about any aspect of Fresh Direct is able to disclose their concerns, through the Ethics Line. Any concerns are investigated thoroughly.

Prevention of slavery and human trafficking in Fresh Direct's supply chain

Supplier adherence to our values

In order to work with Fresh Direct, all suppliers must sign up to our Terms and Conditions of Purchase and our Supplier Charter. These documents require compliance with the Modern Slavery Act 2015 and are regularly reviewed to ensure that they support us in our aim to prevent slavery and human trafficking in our supply chain. They are underpinned by the Sysco Supplier Code of Conduct.

Fresh Direct's Supplier Charter requires our suppliers to join Sedex, one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains. The Sedex platform assists Fresh Direct and its suppliers with managing and improving performance in terms of labour rights, health and safety, the environment and business ethics.

We continue to remind our suppliers of our joint responsibilities and our requirement for their cooperation with any inspections and / or investigations conducted by Fresh Direct from time to time to allow us to verify compliance with our policies.

To ensure all those in our supply chain comply with our values we have in place a supply chain compliance programme.

All new suppliers are assessed and existing suppliers are monitored for compliance and we assess the level of ethical risk at each stage of the supply chain. Effective escalation processes are in place to support decision making, should Fresh Direct become aware of non-compliance. Suppliers are required to undertake an independent ethical audit. The outcome of such an audit is used to determine whether Fresh Direct will work with the supplier. Fresh Direct would address any failure by a supplier to meet Fresh Direct's standards on a case-by-case basis, however, suppliers who fail to meet Fresh Direct's standards may jeopardise their ability to continue to do business with Fresh Direct.

Suppliers' ethical performance is monitored on an ongoing basis using the Sedex risk assessment tool. Our suppliers are required to review and update the Sedex Self-Assessment Questionnaire (SAQ) on an annual basis and to maintain ethical audits at the frequency determined by the level of risk and vulnerability within their supply chain. We will continue to review the effectiveness of these controls in reducing the risk of unethical practices. Our Merchandising, Technical, HR and Legal teams have the primary responsibility for ensuring supplier and contractor adherence to our values.

Due Diligence Processes

As part of our ongoing strategy to identify and mitigate risk, we have systems in place to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Protect whistle blowers.

Training

Fresh Direct's policies and standards are readily available to colleagues through the intranet and notice boards. All Sysco employees must complete mandatory online training on the Sysco Global Code of Conduct, which prohibits child labour, forced labour, and human trafficking in our global supply chain. We provide an online training module on Modern Slavery to colleagues on Sysco's "Thrive" platform, which provides an overview of the legislation and the risks of modern slavery and human trafficking in our supply chains and our business. We provide more tailored training to our supplier-facing colleagues in the Procurement team.

Reporting on our Progress

In the last 12 months:

- Sysco has rolled out its Supplier Code of Conduct and we have incorporated this into our Terms and Conditions of Purchase and our Supplier Charter. This contains a section on "Labor and Human Rights" and all Fresh Direct suppliers are required to adhere to this Code of Conduct.
- All Sysco employees have completed mandatory online training on the Sysco Global Code of Conduct, which prohibits child labour, forced labour, and human trafficking in our global supply chain.
- All colleagues now have access to the online Modern Slavery training module on the Sysco online training portal, "Thrive".

- We have ensured that all new suppliers to Fresh Direct in 2024 are members of Sedex and have completed the self-assessment questionnaire prior to approval into Fresh Direct's supply chain.
- We have continued to monitor existing suppliers' membership status and self-assessment completion, which has provided us with an updated risk profile of the supply chain. We have been able to undertake extended due diligence where higher risk areas are identified.
- A company-wide communications campaign about the Sysco Ethics Line was rolled out alongside the Global Code of Conduct training, which covered how to report inappropriate behaviour through the Ethics Line. Ethics Line posters were sent to all sites and the internal Communication Champions assisted with displaying and promoting the new Ethics line posters.
- During the last 12 months we can confirm that there have been no reports of slavery or human trafficking within the Fresh Direct supply chain.

Further Steps

We recognise that more can always be done to tackle Modern Slavery and, as a business, we remain committed to helping to increase awareness of the issues and engaging in an ongoing review of our practices and policies to combat the risk of slavery and human trafficking. In the next 12 months we intend to take the following steps to continue to further combat these risks:

- We will continue to build on the Modern Slavery training provided on the Sysco online portal "Thrive", by ensuring that all Fresh Direct colleagues are mandated to complete the course and by refreshing and refining our targeted training for supplier-facing colleagues in the Procurement, Finance and Technical teams. The training will focus not only on developing an understanding of core ethical issues but also on the practical steps that can be taken to tackle the root causes of modern slavery issues in supply chains. We will ensure that all new starters in these areas are provided with appropriate training on their induction and receive refresher training as required.
- We will continue to roll out the Sedex platform among our existing supplier base, to provide us with enhanced visibility of ethical risks across our supply chain and use the data captured in the tool to inform our risk assessments.
- We will be publishing an update to our Respect at Work Policy, to include the Ethics Line as a resource to make online or anonymous complaints.
- We will continue to work with our global risk and ethics function at Sysco, to ensure we are sharing best practice and pooling knowledge on the risks of modern slavery in our global supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015

Andy Pembroke, Managing Director, Fresh Direct

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