



Process Heading		Modern Slavery Policy			
Reference:	MODSP	Revision:	3	Date:	Dec 2018

## Introduction

The Company accepts that slavery and human trafficking are a serious concern in modern society and the Company has a collective responsibility to be alert to the risks, however small, through our supply chain. Staff are expected to report concerns and management are expected to act upon them.

The Company and its' affiliated business units, are committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company Directors and Senior Management shall take responsibility for implementing this policy statement and its objectives, to ensure that slavery and human trafficking is not taking place within the organisation.

## Our business

### Organisation Structure

Freshways Group is a leading independent dairy, supplying dairy goods to a diverse consumer base, including, food manufacturers, foodservice customers and retail customers. Freshways also sources and supplies a wide range of own label and branded food including bread, yoghurt, fruit juices, cheeses and eggs.

As a Group, Freshways employs over 750 employees across the UK. Our business is organised into various business units as follows:

- Nijjar Properties Ltd
- Nijjar Dairies Ltd
- Freshways Ltd

### Written policies and procedures

The Company complies with legislation, including fundamental rights at work - in particular, freedom of association and elimination of discrimination throughout an individuals' employment. At present, the Company operates and communicates several policies to ensure fair treatment of employees, which includes policies related to grievance management and reporting, equal opportunities and harassment in the workplace.

### Human Rights

The Company seeks to ensure that all employees are treated in a fair and transparent manner.



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## Violations

The Company will endeavour to update its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its business.

## Recruitment and Employment of Workers

All prospective employees who wish to join the Company must do so by way of undergoing a formal selection process and must present valid documentation that entitles them to work in the UK, without restriction.

Payslips are issued employees and the Company aims to pay all its' employee by BACS into their own bank account or that of their husband/wife/partner only. The Company is compliant with national minimum / living wage regulations and hourly paid workers are entitled to paid overtime, where they accept to work overtime hours.

Where Freshways Group uses temporary workers supplied through an employment agency, we expect and require that the agency has undertaken the appropriate checks. We operate a preferred supplier list for these agencies and those listed are expected to undertake the appropriate background checks on prospective employees and are required to be Gangmaster accredited.

In the event that Freshways Group identifies that an employment agency is not adhering to our standards, the agency will be removed from the preferred supplier list and will not be engaged in any further recruitment activity on any basis

Staff members have the option to avoid working above 48 hrs per week, as per the Working Time Directive and there are procedures in place to address any related staff requests.

## Whistleblowing policy

We have a whistleblowing policy in place which applies to all employees, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers or any other person associated with Freshways Group. Any employee who has concerns about any aspect of the Freshways Group business is able to disclose their concerns in accordance with the whistle blowing policy.

## 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.



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### Further Steps

We intend to take the following further steps to continue to combat slavery and human trafficking, going forwards:

- Launch a new Supplier Code of Conduct, to cover all legal, moral and ethical standards required of our suppliers;
- Launch refresher training for all managers in conducting Right to Work checks;
- Train all managers in the requirements of our Modern Slavery Policy;
- Undertake a review of the effectiveness of our supply chain controls in reducing the risk of unethical practices.

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.*

Signed:

Date:

07/05/2019

**Ravi Nijjar**  
Director