



Freshways Group Modern Slavery Statement

Introduction

This is the modern slavery statement of Nijjar Dairies Limited and Nijjar Property Limited, trading as Freshways, for the financial year ending 31 December 2024, made pursuant to section 54 (part 6) of the UK Modern Slavery Act 2022 and which has been approved by the boards of each company.

Freshways accepts that slavery and human trafficking are a serious concern in society and both it and its suppliers have a collective responsibility to be alert to the risks, however small, that such incidents may arise in its operations and supply chain. This statement includes progress made during the year, and what we intend to do over the next 12 months to address this issue.

Our business

Freshways is a leading independent dairy processor based in Acton, West London, supplying dairy goods in the UK 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 juice, cheese and eggs.

Freshways employs approximately 500 employees and is split into two divisions, which handle the production and distribution parts of the business respectively, managed by a single board of directors.

Policies and Procedures

Freshways' directors and senior managers are committed to a corporate social responsibility that fosters a culture of respect for dignity and human rights as well as high ethical standards in the conduct of the business.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner and they include the following:

Supplier Code of Conduct

This contains the basic principles of what we expect from suppliers of goods and services to Freshways and the legal and ethical requirements they must meet. These obligations include having processes in place to protect against occurrences of modern slavery in their supply chain, and also agreeing to meet various environmental and social standards.

Human Rights

We have in place a human rights policy and seek to ensure that all employees are treated in a fair, transparent and respectful manner in accordance with applicable law and standards of dignity.

Recruitment and employees

We have in place and operate a large number of HR policies including robust recruitment processes. All prospective employees who wish to join Freshways 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.

Where Freshways uses temporary workers supplied through an employment agency, 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 accredited with the Gangmasters' Licencing Authority. All agency employees undergo the same induction and training as Freshways staff.

Whistleblowing and public interest disclosure policies

We have in place both whistleblowing and public interest disclosure policies which apply to all employees, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers or any other person associated with Freshways. Any employee who has concerns about any aspect of the Freshways Group business is able to disclose their concerns in accordance with these policies.

Suppliers and our own operations

Freshways commits to only engaging suppliers which share the same values and principles and where necessary, will take corrective measures with such suppliers.

In 2023 we developed our Supplier Code of Conduct, which formalises the requirement of suppliers to have policies and procedures in place covering various issues including legal compliance; human rights, ethical and social standards, health and safety, fair business practices, food safety and quality, sustainability, supply chain transparency and traceability. The roll out of our Supplier Code of Conduct commenced in 2024 and will continue this year.

We assess supplier compliance through the use of ESG surveys, require them to meet GFSI standards and reserve the right to carry out (un)announced assessments of any supplier, including the right to conduct an independent assessment against the Ethical Trading Initiative Base Code or appropriate other standard especially if a supplier is identified as a high risk or strategic supplier to Freshways.

In November 2024, we underwent our first assessment by EcoVadis. The assessment is an evidence-based evaluation across 21 key sustainability criteria, covering four pillars: environment, labour and human rights, ethics, and sustainable procurement. We have received a score and earned a Committed Badge, recognising our dedication to upholding high standards in ESG practices. Freshways plans to repeat the process and improve our rating in the future.

Risk assessments, training and Key Performance Indicators

In order to ensure that key staff understand and are aware of the risks of modern slavery and human trafficking and can assist us in its prevention, both in our business and in our supply chain, we have carried out training of senior managers and this topic is maintained as a high priority in the business. We take a risk based approach, employing diverse compliance standards to assess, track and adhere adherence to regulatory requirements and ethical practices and carry out routine risk assessments of our supply chain. Indicators of the effectiveness of the steps we are taking to ensure slavery and/ or human trafficking is not taking place within our business include an absence of reports or findings from employees or suppliers, or public or law enforcement agencies to indicate modern slavery practices have been identified, regular due diligence being conducted on our supply chain where necessary and mandatory annual training being carried out by senior management in our business.

Further Steps

In the next 12 months we intend to do the following to continue to combat potential instances of modern slavery or human trafficking in our supply chain:

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- Continue the roll -out of our Supplier Code of Conduct;
- Repeat mandatory training for senior managers on the risks of modern slavery and related issues; and
- Conduct a Human Rights Impact Assessment amongst senior managers and relevant stakeholders.

Signed by:

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Ravi Nijjar
Director
31st March 2024.