

This statement is published in accordance with the Modern Slavery Act 2015 and includes the steps we have taken during our 2020 financial year (ending December 31<sup>st</sup> 2020) to ensure that trafficking and modern slavery does not take place in our value chains - including both our own business and our supply chain.

We are committed to preventing slavery and human trafficking in our corporate activities and to ensuring our supply chains are free from slavery and human trafficking.

To date, there have been no identified instances of modern slavery within SHS Group, its subsidiaries, or its supply chain.

## OUR ORGANISATIONAL STRUCTURE

SHS Group incorporates several subsidiaries as detailed below. Across our divisions we have a global supply chain spanning over 35 countries and have worked in partnership with several of our key suppliers for multiple decades.

Our products are supplied to several major UK retailers and other food manufacturers.

## SHS GROUP SUBSIDIARIES

- 3v Natural Foods
- Beverage Brands (U.K.) Limited
- The British Pepper and Spice Company Limited
- Caledonian Bottlers PLC
- Charles Gordon Associates Limited
- The Crucial Sauce Company Limited
- M&P Sales and Marketing Limited
- Meridian Foods Limited
- SHS Group Limited
- SHS Sales and Marketing (GB) Limited
- SHS Sales and Marketing Limited
- Standard Brands (Trading) Ireland
- Standard Brands (UK) Limited
- Super Nuva LTD
- Woodchester Enterprises Limited
- Zip Fires Overseas European Trading Limited
- Zip Fires Overseas Sales Limited
- Zip Fires Overseas Trading Limited

## OUR POLICY ON CHILD LABOUR

We require all of our suppliers to adhere to the standards set out by the International Labour Organisation as regards the employment of children and young people. In particular: (a) children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 15; and (b) those under 18 must not be required to perform hazardous duties.

Any incidences of Child Labour identified in our supply chains will be dealt with in line with the SHS Group Child Labour remediation guidance.

## WHAT THIS POLICY MEANS FOR YOU

We require all our staff, suppliers, contractors, agents and all other individuals and businesses with whom we work, to comply with this policy and our approach to modern slavery and human trafficking.

We require all relevant individuals to:

- (a) read and ensure they understand this policy
- (b) report any behaviour which they believe may breach this policy to an appropriate manager
- (c) communicate our policy to all relevant colleagues and business partners whenever appropriate
- (d) ensure they carry out their roles in a way which enables SHS group to comply with this policy.

We require all businesses with whom we work to:

- (a) adopt policies and procedures within their own businesses to enable them (and their staff) to comply with this policy
- (b) ensure that their staff hiring practices (including for the hiring of temporary staff via agencies and similar providers) are designed to establish that all workers are giving their labour of their own volition and are not being controlled by others to any extent
- (c) adopt policies and procedures in relation to the selection and management of their own suppliers which aim to identify and manage the risks of modern slavery and human trafficking
- (d) maintain records to enable them to provide us with the information we need to publish an annual supply chain transparency statement
- (e) monitor the success of the policies and procedures described above, in order to constantly raise standards.

## POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Human trafficking and slavery have no place in the modern world. We are committed to ensuring there is no modern slavery or human trafficking within our supply chains or in any part of our business and protecting our employees from exploitation.

We comply with or exceed all legal requirements surrounding employee rights, health and safety and ethical responsibilities. We have therefore developed policies, processes and procures across the SHS Group to reflect our commitment to acting ethically and sustainably and by implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chains. These include our:

- Anti-Slavery and Human Trafficking Policy
- Corporate Social Responsibility Policy
- Ethical Trading Policy
- Child Labour remediation guidance
- Temporary Labour Policy - Divisionally specified

## DUE DILIGENCE AND RISK ASSESSMENT AND MANAGEMENT

We have an extensive supply chain and recognise the risk presented by human trafficking and slavery within this.

We adhere to the principles of the Ethical Trading Initiative (ETI) along with specific requirements set by our customers' ethical standards. We therefore require suppliers to be fully aligned to the ETI base code within our supplier management process as a minimum standard.

We work to keep our supply chains as short as practicable. We review supplier performance frequently and audit suppliers regularly, basing frequency upon a number of factors including any inherent or increased risks of modern slavery and ethical considerations. All our supplier audits include ethical criteria based upon the ETI base code, including risks of modern slavery.

Permanent employment is better for colleagues and limits the risk of human trafficking or modern slavery within our business. Where we use agency workers this is to fill short-term employment needs and we only use long term partners that operate to our own high standards.

We also have established a transparent and open process to support our 1200 employees in raising concerns through a whistleblowing telephone line, run 24/7 by an independent third party.

## TRAINING

We provide our HR and Operations employees with training to help them identify potential issues and how to deal with this.

## ACTION TAKEN TO ADDRESS MODERN SLAVERY

We use supplier performance scorecards and KPIs as part of our supplier risk management. We regularly audit our suppliers and include ethical considerations and criteria, including those around risks of modern slavery and child labour within the chain.

During our 2021 financial year, we will be doing the following:

- Building upon our staff awareness of the risks and impact of modern slavery focusing on Purchasing and Technical.
- Building upon SHS Group's due diligence and impact assessments for its raw materials and suppliers in relation to human rights and sustainability.
- Launching our Sustainability Strategy which places Sustainable Sourcing and Social Impact and Wellbeing as cornerstones of the strategy.
- Continually reviewing and strengthening our supplier approval and management process to ensure sustained improvement.
- Continuing the roll out of an English language programme to provide employees with the necessary skills to support them in raising concerns.

## CONSEQUENCES OF BREACHING THIS POLICY

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- This policy does not form part of any employee's contract of employment and we may amend it at any time.
- We may terminate our relationship with suppliers and other business partners if they breach this policy.

Date: 30<sup>th</sup> April 2021