



## MODERN SLAVERY STATEMENT

Froneri operates in 22 countries across the world, employing around 15,000 people with sites in Europe, the Middle East, Argentina, Australia, Brazil, the Philippines and South Africa. Its raw material products are sourced from a range of national and international suppliers managed by a centralised buying team.

Froneri operates under a code of Ethical Conduct driven from ethical trading standards and takes care in choosing suppliers to ensure they operate to similar high standards, practices and working conditions.

Froneri are a consumer focussed company whose first priority is to deliver value to its customers and consumers. Froneri believe in working with all its staff as a team to achieve superior results with everyone taking individual accountability.

As a company Froneri consistently adopts and implements labour practices that meet or exceed recognised international standards and human rights and will through promotion, monitoring, training and audit verification maintain these standards. Through its endeavours it also ensures that all suppliers apply the same standards.

Ethical trading audits are conducted annually, on an unannounced basis across all its UK sites, and with other sites in the group which produce for the UK market. The scope of each audit covers the ETI base code, management systems, code implementation, entitlement to work and immigration. Audits are performed by independent 3<sup>rd</sup> party audit companies who specialize in social responsibility auditing. They are shared via Sedex (the Supplier Ethical Data Exchange), a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains. Audits comprise of interviews with workers and management, inspection of the production site and review of records.

Froneri provides training on its code of conduct to all its employees on matters of forced labour and human trafficking. Every employee must follow this code as well as the procedures and related policies.

This past year we have developed Policy and Procedure that includes the principles of the ethical trading initiative base code to mitigate the risk of modern slavery and communicate to all suppliers. A third party audit company conducted a risk analysis of all suppliers. Its assessment was based upon geography, the commodity purchased, supplier quality performance, and the nature of the business transaction.

Classified into high, med and low, the assessment mitigates the risk of modern slavery within our supply chain, and leads to an unannounced supplier audit. All high and medium rated suppliers together with a sample of those who were classified in low risk were invited to join Sedex and complete a Self-Assessment Questionnaire (SAQ) on labour management, employment, Health & Safety and environment within their business.



The plan for the next 12 months is to create working partnerships with suppliers who had a risk rating of high or medium risk and to lower the risk level by education and information through SAQ evaluation and auditing.

Future planning and measurements will be via annual comparison reports generated from SAQ and audits to highlight progression. Froneri will then create working partnerships with all suppliers to embed Policies and systems to create acceptable standards in line with ethical trading initiative base code.

This will be monitored and measured through statistical and analytical analysis of all aspects of the business. Froneri will drive and enhance performance monitoring to maximize organisational effectiveness throughout the business as a whole.

A handwritten signature in black ink, appearing to read "Mike Fraine".

Mike Fraine  
Head of UK & Ireland