Modern Slavery Statement

April 2018 – March 2019

Modern slavery is a global issue which affects all industries and geographies – World Wise Foods is committed to understanding the modern slavery risks within our business and using this information to put controls in place to mitigate against the risks of modern slavery. We are committed to ensuring that all workers in our supply chains are treated with dignity, and that their human rights are respected. We fully support the UN Guiding Principles on Business and Human Rights and take seriously our responsibility to prevent, mitigate and remediate human rights abuses both through our own actions, and collaboration with others.

This is the third modern slavery statement produced by World Wise Foods made pursuant to section 54 of the Modern Slavery Act 2015. The statement sets out the steps taken by the group (going forward referred to as "World Wise Foods") to prevent modern slavery within our supply chains during the financial year 2018/19 (ending March 31st 2019) and the plans to further develop this work in 2019/20.

About World Wise Foods

World Wise Foods is an distributor supplying private label and branded food products to leading retailers, manufacturers and food service businesses worldwide. World Wise Foods has a UK offices with staff covering commercial, finance, supply chain, technical and ethical trade functions. In 2018 World Wise Foods opened an office in Thailand which provides additional commercial and technical expertise closer to our supply base. Storage and distribution is handled by contracted third parties based in the UK and Europe. We have direct relationships with the manufacturing sites of our finished products, and in some cases also work directly with raw material suppliers. World Wise Foods works closely with our suppliers in Africa, South-East Asia, Europe and North America – the strong and lasting relationships we have in place position us to drive continuous improvement on ethical standards within our supply chains.

£73m*	42	342	24	15	66%**	19,500+
Revenue 18/19	employees	Product lines	Suppliers	Supplier countries	Suppliers in high risk locations	Workers in our tier one supply chains

* Revenue from 01 April 2018-31 March 2019 ** Locations defined as high risk in Food Network for Ethical Trade (FNET) risk assessment tool

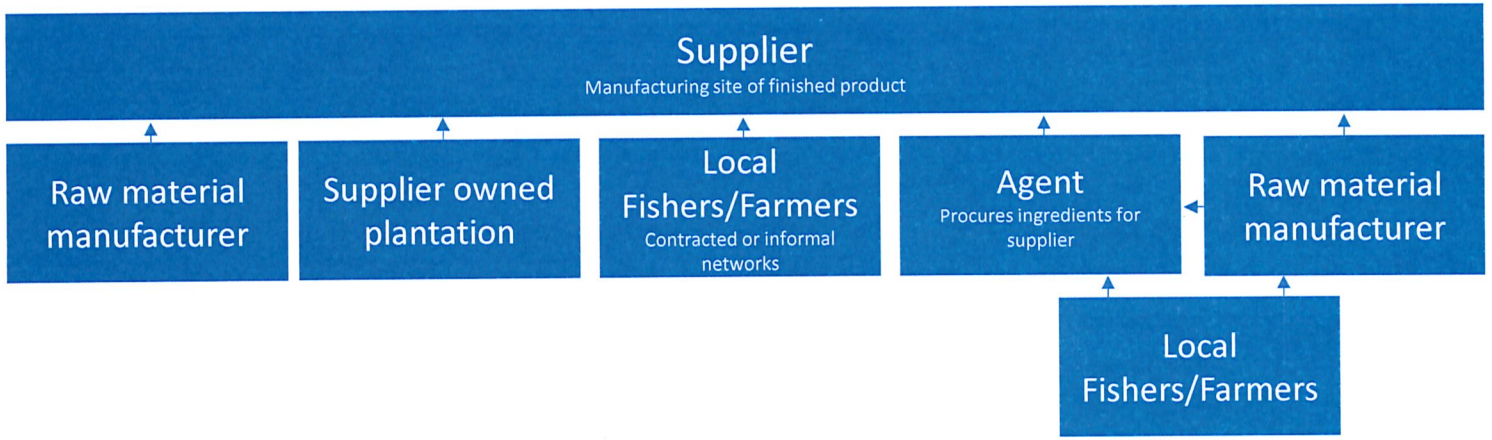
Our Supply Chains

World Wise Foods divides it's supply chains into two categories;

1. **Private label and branded food products for leading retailers, manufacturers and food service businesses**: These products are developed and launched through collaboration with customers, the Technical Team and suppliers. The Ethical Trade Manager sits within the Technical Team and reports to the Group Technical Manager.

2. **Outsourced support services:** These services (IT, cleaning, product testing, storage and distribution etc) are procured and managed by the Operations Director, Group Technical Manager, Supply Director and their respective teams.

Product ingredient supply chains can be complex – for example one of our oriental sauces may contain 30 ingredients from 24 suppliers in 5 countries. A general outline of our supply chains to ingredient level is below. Suppliers will use a combination of these different sources of ingredients depending on the product;



Supply Chain Transparency is a priority area for World Wise Foods – it is key to managing product safety, product quality, product integrity, and human rights risks in our supply chains. In 2019 we will be publishing a map identifying all of our tier one suppliers on our website.

In 2018 we have collated all of the information on tier one and tier two source suppliers from our product specifications to enable us to identify human rights risks down to raw material level. The risk ratings are based on data on human rights risks at country and ingredient level from the Food Network for Ethical Trade (FNET) ingredient risk assessment tool, combined with our own additional risk criteria. All ingredients have been assigned a high, medium or low risk rating – high risk ingredients have been prioritised with our ethical trade plan.

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World Wise Foods Policies & Supplier Management Processes

World Wise Foods has a number of internal policies and procedures which demonstrate our commitment to ensuring modern slavery is not present within our business or supply chains. Implementing these policies in our own business, and in our supply chains help to raise the level of understanding of the risks of modern slavery and how we can mitigate against these.

1. **Responsible Sourcing Code of Practice for Suppliers***: This policy was approved in 2018 and outlines the standards all our tier one suppliers are expected to meet. The policy includes minimum standards (based on the ETI base code) and standards on human rights, health and safety and the environment that suppliers are expected to work towards with our support. The policy includes requirements for regular SEDEX/SMETA audits. In 2019 we will be asking current suppliers to sign and adopt this code of practice. All new suppliers will be required to do this before supply commences. We will also be publishing it on our website.

2. **Human Rights policy*:** This policy was approved in 2018 and it identifies the most vulnerable groups within our supply chains as migrant workers, women and child labour/young workers. The policy includes detailed guidance for suppliers on minimum and expected standards which we will support them to work towards. The policy focuses on what is required to ensure workplace equality alongside the extra provisions for vulnerable workers to ensure there is no discrimination in the workplace. The policy covers all aspects of employment from recruitment, employment terms, worker representation (trade unions and/or worker committees), grievance procedures, access to remedy and end of contract processes. In 2019 we will be sharing this policy with all suppliers and publishing it on our website. We will also be continuing the work begun in 2018 with our high risk suppliers to assess their levels of compliance and identify areas of improvement.

3. **Supplier Approval and Monitoring Procedure:** All our direct suppliers are approved through a formal process which includes a review of their compliance against our ethical criteria. This includes a review of their latest ethical audit and follow up questions with the supplier. In the absence of good quality audit information the Ethical Trade Manager will visit a supplier to assess compliance as part of the approval process. In 2018 this procedure has been adjusted so that suppliers are assessed against the requirements outlined in our Responsible Sourcing Code of Practice.

4. **Supplier Performance Review Procedure:** The performance of all direct suppliers is assessed on a quarterly basis, this assessment has always included a review of ethical performance. In 2018 the criteria for ethical performance has been updated to include both audit data and a measure of how committed the supplier is to continuous improvement.

5. **Internal World Wise Foods policies:** World Wise Foods has a number of policies that aim to ensure modern slavery issues are mitigated against within our own operations. These include our Core Mission & Values, Equality and Diversity Policy and Business Code of Conduct Guidelines. We regularly review our employee facing policies and contractual terms against industry best practice. We promote worker voice through our Employee Working Group.

The Chief Executive and Board of Directors are responsible for ensuring World Wise Foods meets its human rights responsibilities. Ethical risks and progress against objectives are reported quarterly to senior managers and board members. All policies and procedures are approved by the CEO and/or relevant members of the Senior Management Team which includes the Group Technical Manager, Commercial Director, Operations Director, Supply Director and HR Manager. The Ethical Trade Manager works in collaboration with supplier facing Technical Managers/Technologists and senior managers responsible for supplier management to introduce policies at supplier level, assess compliance and agree any follow up actions.

**Note: Policies 1 & 2 above have replaced the CSR Policy and Slavery and Human Trafficking Policy referred to in the 2017/18 Modern Slavery Statement*

Risk Assessment

World Wise Foods recognises that there are risks of modern slavery in areas of our business where;

- Suppliers are based in countries rated as high risk for human rights issues by the FNET risk assessment tool
- Products include ingredients that the FNET risk assessment tool has identified as high risk for human risks issues due to reported issues in their source country
- Migrant labour is used
- Child labour or young workers (particularly at farm level, or on-board fishing vessels) could be used
- Women workers are employed
- Recruitment channels without robust checks and balances that protect workers from paying recruitment fees are utilised

World Wise Foods approach to risk assessment includes research into particular regions and thematic issues as well as horizon scanning for current risks being raised by human rights networks. This information is combined with on-site assessments of tier one suppliers against World Wise Foods policies alongside ethical audits.

In 2018 we have developed a risk assessment process which has rated all of our ingredients as high, medium or low risk based on criteria including known human rights risks at country and ingredient level. This rating has fed into a new tier one supplier risk assessment process which also includes criteria around ethical performance. Both risk assessment processes will be reviewed annually and Technical Managers/Technologists are required to information the Ethical Trade Manager if new products are developed containing any of the identified high risk ingredients. Combined, this assessment of ingredient and suppliers has informed our ethical trade plan which focuses on our high risk ingredients and their suppliers.

High Risk Ingredients:

Coconut, Pineapple, Tropical Fruits, Fish Derivatives, Tomato, Herbs & Spices, Peanuts, Sugar, Rice, Tuna, Soy, Cashew, Salmon

High Risk Supplier Locations:

Greece, India, Indonesia, Malaysia, Maldives, Philippines, South Africa, Swaziland, Thailand

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Ethical Trade Focus Areas

In 2017/18 the main focus of World Wise Foods modern slavery focused actions were the development of relevant supplier facing policies, completing a human rights risk assessment of ingredients and suppliers and developing a three year ethical trade plan to mitigate against these risks. These processes were led by the Ethical Trade Manager who was recruited in May 2018.

In 2017/18 we have also continued to ensure all suppliers have regular SMETA/SEDEX or BSCI ethical audits (as per customer requirements) and that non-conformances are followed up and addressed. As part of our recognition of the limitations of audits to identify human right risks the Ethical Trade Manager has also visited six of our suppliers located in high risk countries to conduct an assessment of compliance against World Wise Foods policies. Any findings are developed into action plans with our suppliers. This process has led to significant improvements at sites where either audits had not identified areas for improvement, or where best practice has changed since the last audit took place.

As per the 2017/18 Modern Slavery Statement World Wise Foods is committed to going beyond audit and has continued its partnership with the Issara Institute in Thailand working with five suppliers to improve worker voice through access to worker hotlines and the use of worker satisfaction surveys. In addition, Issara has continued to work with and train suppliers looking specifically at responsible recruitment challenges with suppliers identifying their own recruitment channels and ways these could be improved to reduce the risk to migrant workers. This focus on responsible recruitment will continue into 2018/19 with the aim of identifying the costs of moving to a no-fee for workers model by our suppliers, extending support on responsible recruitment to our Maldives suppliers and identifying all other supplier sites where recruitment fees are currently being paid by workers.

The priorities and new areas of work for 2018/19 are captured in the commitments made at the end of this document and cover the following areas;

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Stakeholder Engagement and Partnerships

World Wise Foods recognises the value of engaging and partnering with NGOs and other industry bodies in order to drive change and eliminate modern slavery within our supply chains.

In 2016 we were the first business of our kind (non-retailer) to become a strategic partner of the Issara Institute and we continue to develop this relationship with five of our suppliers in Thailand with a focus on investment in worker voice and responsible recruitment.

We are active members of the Food Network for Ethical Trade and participate in their working groups on responsible recruitment, worker voice, risks in transports and logistics and risk assessment. The FNET risk assessment tool enables us to complete ongoing robust assessments of human rights risks in our supply chains at ingredient level.

In 2018 we participated in the Seafood Ethics Action Alliance (SEA Alliance), a seafood focused group which focuses on tackling ethical issues within seafood supply chains by using collective leverage from retailers and suppliers. One of the issues in this groups work plan is improving on-board transparency of human rights practices on fishing vessels – this year we are partnering with the International Pole and Line Foundation (IPNLF) to further explore human rights risks at sea in the Maldives, and how these could be more effectively continuously monitored. Our CEO John Burton continues to lead our engagement with the IPNLF as Chairman.

We continue to engage informally with the Sea Food Ethics Common Language Group (SECLG), Institute for Human Rights and Business (IHRB) and other networks which offer the opportunity to leverage change on modern slavery in our supply chains.

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Progress: 2018-2019

Progress 2018/19	Not started	Behind	In Progress	Completed
Active collaboration with industry groups (FNET/SEA Alliance) on human rights risks in our supply chains			→	
Develop Responsible Sourcing Code of Practice for Suppliers & Human Rights Policy			→	→
Develop and complete human rights risk assessment for ingredients and suppliers			→	→
Update supplier approval procedure and supplier performance procedure to include updated scoring criteria for ethical performance			→	→
Ongoing review of human rights risks at country and ingredient level			→	
All supplier ethical audits completed and actions to address non-conformances agreed with retailers			→	
World Wise Foods commitment to be a living wage employer			→	→
Continue focus on responsible recruitment with five Thai suppliers and The Issara Institute			→	

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Commitments: 2019 - 2020

Commitments 2019/20	Not started	Behind	In Progress	Completed
Increase in number of suppliers graded as performing well (scoring 1 or 2) against ethical criteria in quarterly ethical performance reviews			→	
Demonstrate supply chain transparency by publishing a map of suppliers on our website	→			
Publish Responsible Sourcing Code of Practice (for suppliers) and Human Rights Policy on our website	→			
Introduce Responsible Sourcing Code of Practice and Human Rights policy to all suppliers			→	
Assess at least 50% of our high risk suppliers against compliance to Human Rights policy and develop ethical action plans where required			→	
Extend work on responsible recruitment to two further suppliers and identify all other suppliers with recruitment fees in our supply chains			→	
Continue collaboration with the International Pole and Line Foundation researching on-board human rights practices in the Maldives			→	
Continue focus on responsible recruitment with five Thai suppliers and The Issara Institute			→	
Complete research to identify any points of high risk for modern slavery within our European handpicked fruit and vegetable supply chains	→			
Active collaboration with industry groups (FNET/SEA Alliance) on human rights risks in our supply chains			→	
Ongoing review of human rights risks at country and ingredient level			→	
All supplier ethical audits completed and actions to address non-conformances agreed with retailers			→	

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Assessment of Effectiveness in preventing modern slavery

Modern slavery is complex and takes many forms. World Wise Foods takes its responsibility seriously – we are committed to identifying where the risks of modern slavery are in our supply chains and ensuring we are mitigating against these risks. We achieve this by working directly with our suppliers and customers and actively engaging in industry groups such as the Food Network for Ethical Trade (FNET).

This year we have made significant progress understanding human rights risks at supplier and ingredient level and have developed priority areas to progress based on this risk assessment. Investing in capacity to drive our ethical trade priorities through the Ethical Trade Manager recruited in May 2018, has given additional capacity to engage with suppliers to improve their ethical audit results, and to work with suppliers to address the root causes of any issues found in audits.

Developing the World Wise Foods Human Rights policy and Responsible Sourcing Code of Practice for our suppliers enables us to set out clear expectations on human rights in our supply chain and next year will we be investing in supplier ownership of these policies as part of our beyond audit approach. We also recognise that modern slavery issues can be part of the systems and structures our suppliers operate within – our continuation as a strategic partner of the Issara Institute is part of our contribution to address the root cause of debt bondage through recruitment fees.

We are committed to progressing this work further over the next year with a particular focus on further supply chain mapping, responsible recruitment and supplier engagement.

World Wise Foods Modern Slavery Statement March 2019 – Feb 2020 was prepared by the Ethical Trade Manager and approved by the CEO on behalf of the World Wise Foods Board on 26 March 2019.

Signed

John Burton

Chairman and Chief Executive, World Wise Foods

30th April 2019

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