

## INTRODUCTION

Ethical operational practice is a key Fresh to Desk value. We recognise modern slavery as a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. This crime can manifest itself in many ways; it can take various forms, such as slavery, servitude, forced or compulsory labour, human trafficking, & other forms of labour exploitation.

Fresh to Desk is committed to transparency in our approach to tackling modern slavery in our own business & throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our senior management fully supports the aims of the Act & is committed to combating the risk of slavery & human trafficking in our business & supply chain.

Fresh to Desk has in place ethical trading standards to which each of our suppliers is required to adhere, as well as a set of values which requires us, among other things, to act with integrity & responsibility, & to always do the right thing. Our commitment to anti-slavery & human trafficking applies to all employees, suppliers & other business partners.

## ORGANISATION STRUCTURE & SUPPLY CHAIN

Fresh to Desk Ltd is a well-established hospitality & catering service. We use several specialist suppliers of frozen, chilled, fresh & ambient food products & other consumer goods to the foodservice industry. And whilst we pride ourselves in sourcing local products, our supply chain does also source globally to add versatility & authentic provenance to the wide range we offer to our customers.

This leaves us & our supply chains at severe risk of utilising methods contrary to protecting people. Therefore, we will continue to work with our customers & our supply partners to work towards a safer future; ensuring that they comply with our values & that they are aware of our commitment to protect human rights & the environment. As part of our procurement processes, we require all our suppliers to comply with the requirements of the Modern Slavery Act & include appropriate contractual obligations within our commercial agreements.

## OUR POLICY

Fresh to Desk fully understands its responsibilities under the Modern Slavery Act 2015 & therefore has a zero-tolerance approach to modern slavery. Our Modern Slavery Policy is implemented & monitored through various operational processes of our business & supply chain. As a responsible company, we aim to continuously improve on our systems & controls to ensure modern slavery is not taking place anywhere in our own business, or in our supply chain.

## OUR DUE DILIGENCE PROCESSES

### In Our Business Operations

- Right to Work Checks  
All colleagues employed by Fresh to Desk who work on a temporary, fixed term or permanent basis are subject to a right to work check in accordance with UK legislation. A person is unable to commence work for unless they satisfy us that they are legally able to work within the UK.

Fresh to Desk does not employ agency workers nor recruitment agencies, preferring to oversee the recruitment process ourselves. We use an established online recruitment company which adheres to a few human resource codes of conduct & has a published anti modern slavery policy & statement.

- Whistleblowing  
Fresh to Desk has a whistleblowing policy in place within its Employment Handbook, which applies to all employees. Any colleague who has concerns about any aspect of the

# MODERN SLAVERY STATEMENT



Company is able to disclose their concerns confidentially. Any concerns are investigated thoroughly.

The Employment Handbook also contains an Employee Code of Conduct, an Anti-Discrimination, Anti-Bullying, Anti-Harassment & Grievance policies. These apply to every person working for Fresh to Desk and require all employees to act ethically & always comply with applicable legal requirements.

## In Our Supply Chain

- Supplier adherence to our values  
Fresh to Desk has worked with the same core suppliers for a number of years who have established anti modern slavery policies and statements in place which are readily accessible.

For example, our main supplier, Kent Frozen Foods is a member of SEDEX, one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains. The SEDEX platform helps KFF and its suppliers with managing and improving performance when it comes to labour rights, health and safety, the environment & business ethics.

## TRAINING

Fresh to Desk's policies & standards are readily available to colleagues via our Employment Handbook. We continue to train all new starters in the contents of this important document which is regularly reviewed & updated to comply with the latest legislation. As of 2022, we now incorporate a Modern Slavery clause within all new employment contracts to enhance awareness prior to commencement of employment.

## REPORTING ON OUR PROGRESS

All our relevant policies are reviewed annually to continuously monitor & implement any changes required by the Modern Slavery Act 2015 within our business & supply chain. We work with our suppliers to ensure they are aware of our joint responsibilities.

Furthermore, we support our customers to ensure that we promptly complete any updated paperwork to support them in their monitoring of their anti-slavery policies.

## FURTHER STEPS

Whilst having policies and processes in place to combat slavery and human trafficking, we recognise this is an area which requires continual monitoring and improvement. On an ongoing basis we will:

- continue to apply good practice in assessing new suppliers as well as reviewing existing relationships
- keep training under review to ensure it remains appropriate
- consider any relevant & appropriate reporting on key performance indicators.

Fresh to Desk firmly believes in being a responsible business & continuing to develop our approach to combating modern slavery forms a key part of this.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 & constitutes our slavery & human trafficking statement for the financial year ending February 2024.**