

# Modern Slavery Statement

31 December 2023

**apetito**

WILTSHIRE  
EST. FARM 1991  
FOODS

*Making a real difference*



## 1. Introduction

apetito Ltd. fully supports the transparency in supply chains provision (Section 54) of the Modern Slavery Act (2015), focusing on the prevention of modern slavery and human trafficking. The risks of modern slavery are universal and affect all businesses, regardless of location or industry. We continue to support and update our Modern Slavery Policy in line with government guidance showing our progress so far and areas for improvement moving forward.

The following statement reflects our continued commitment to ensuring ethical working conditions in our supply chain and operations and details our efforts to tackle these challenges and support stakeholder and industry-level collaboration to eradicate modern slavery and human trafficking. At apetito, we are committed to ensuring a culture of ethical business practice and will ensure we report on our progress in a transparent manner.

## 2. Our Structure

apetito Ltd is an award-winning food producer, providing delicious, nutritious, and sustainable meals to hospitals, care homes, nurseries, schools, and local authorities alongside operating a direct to customer retail business Wiltshire Farm Foods.

We are an organisation with both a social and commercial purpose, aiming to “make a real difference” in whatever we do. Our operations comprise of our main production kitchen, our main distribution centre, six strategic depots to support national logistics, and Wiltshire Farm Foods depots all over the UK of which around a third operate as external franchises. We employ nearly 2000 staff across our operations and offices in a diverse range of roles.

Due to the nature of our business, we occasionally need to employ temporary staff to support peaks in workload. We work with several trusted recruitment partners for recruitment of our manufacturing and distribution staff. These agencies will be licensed labour providers under the Gangmaster Licensing Act 2004.

In addition, our principal partner is a member of the Association of Labour Providers (ALP), Recruitment and Employment Confederation and a Sedex member. ALP is a not-for-profit trade association promoting responsible recruitment through six policy focus areas:

- **Supply Chain Partner**  
Driving awareness of the crucial role labour providers undertake in supply chains through the sourcing and supply of a high calibre future workforce.
- **Access to Labour**  
Promoting national policy actions and developing industry capability to maintain ongoing access to an adequate labour supply of all skill levels.
- **Fair Charge Rates**  
Promoting payment of fair charge rates to labour providers that enable business sustainability and do not foster worker exploitation or tax evasion
- **Fair to Workers**  
Supporting labour providers to meet legal and ethical responsibilities and to treat workers fairly and with respect.

- **Fair Competition**  
Support for clear and proportionate regulation of labour provision that facilitates fair competition.
- **Responsible Recruitment**  
Leading a stakeholder partnership approach to drive continuous improvement in responsible recruitment standards applied by labour providers.

As a food manufacturer that prioritises great quality raw materials and ethical and sustainable sourcing, our supply chain is both local and global ranging from small producers to larger businesses. We pride ourselves on working with suppliers who share our values and look to build successful, fair long-term relationships.

### 3. Our commitment to ethical trade and responsible sourcing

Ethics and sustainability are at the heart of how our business operates. To support our commitments and work in this area we were successful in our application to become members of the Ethical Trade Initiative (ETI) in 2016.

ETI membership has given us the opportunity to deepen our understanding on ethical trade: through training, access to working groups and the chance to collaborate and learn from a diverse group of members, retailers, suppliers, trade unions and non-government organisations (NGOs).

Our supplier code of conduct and ethical trading policies incorporate the ETI base code, so all suppliers who work with us are clear about our ethical trade commitments. Suppliers sign up to this as part of the terms and conditions of working with us. The base code demonstrates the minimum standard we expect suppliers to meet however we highly encourage them to strive for the best. This basecode focuses on 9 areas:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

We regularly report our ethical trade-related activities to the ETI through both informal updates, progress meetings throughout the year and sector working groups.

As part of our commitment to ensuring fair wages, we are proud to have been accredited by the Living Wage Foundation as an accredited Living Wage Employer since 2016.

### 4. Employee representation

We run an anonymous employee survey to gain open and honest feedback from employees across the business. The results from this survey are shared with all staff and action plans are agreed upon as appropriate.

We have a worker's council in place with colleagues elected from different areas of our business, as part of our access to workplace representation programme.

## 5. Risks and Steps Taken

Our procurement team are focused on building long-term relationships and procuring quality raw materials from suppliers who share our ethical and sustainable values. We are proud to support the British food and farming industry, and each year we spend a significant proportion of our purchasing budget with British and Irish suppliers. Due to the variety of meals, we produce and our rigorous sourcing requirements, we often need to source ingredients globally. As a business we are continually considering the risks around modern slavery. Over the past 12 months, 3 key risks have been identified and measures to manage identified:

- **Russia's invasion of Ukraine**  
The war in Ukraine means there is an increased risk of worker exploitation. Many of those seeking refuge from the Ukraine and looking for employment are at risk of being targeted and exploited. Due diligence is therefore essential to ensure the protection and safety of workers across our supply chain including understanding the recruitment process used by our suppliers
- **Food Inflation**  
Higher food prices are increasingly putting pressure on the supply chain and increasing the risk of worker exploitation and abuse. Some suppliers will have faced greater challenges than others. It is therefore important that we work closely with our suppliers through this challenging time to ensure workers rights are not compromised.
- **Brexit**  
Due to the changes in immigration system post-Brexit, there are concerns that seasonal workers may be at increased risk of exploitation as the UK increasingly looks outside of Europe for seasonal workers which brings additional risks and consideration meaning attention must be paid.

## 6. Strategy and policy

Protecting and respecting human rights and labour standards is one of the foundations of our sustainability and ethical trade strategy.

We have several policies that support our work in tackling modern slavery, these include:

- **Ethical Trade Policy**  
Our Ethical Trade Policy sets out our approach to managing and ensuring ethical trade both internally and throughout our supply chain. It demonstrates our commitment to the Ethical Trade Initiative, the work currently underway to promote ethical trade and ongoing plans to both better understand and support our supply chain.
- **Buyer-Supplier Code of practice**  
We have strengthened our code of practice by setting minimum standards for our

buyers and suppliers. The code specifies that both parties will work together to continuously improve workers' rights and labour standards.

- **Whistleblowing policy**

Our whistleblowing policy encourages all our staff and agency workers to report any concerns related to the organisation's direct activities or the supply chains, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

- **Employee code of conduct**

Our Employee Code of Conduct reflects the values and culture that the apetito Group has developed and practised over many years. It is based on the simple principle that we always want to do "the right thing". The Code of Conduct describes our values and regulations. It was designed to help us continuously improve our business relationships with internal and external partners. All employees belonging to the apetito Group are required to apply these standards and values and to avoid situations that could conflict with our company's business or reputation.

- **Recruitment policy**

All new employees are subject to pre-employment checks to confirm their identity and right to work in the UK. Where recruitment agencies are used, we ensure they comply with all legal requirements as a minimum.

## 7. Governance and due diligence process

We have a dedicated, ethical trade steering group with representatives from sustainability, technical, purchasing, and human resources teams that work closely to ensure we deliver on ethical trade commitments and regularly review our policies and processes.

We use an approved third-party ethical auditing system as part of our supply chain due diligence process, which requests suppliers join and complete a self-assessment questionnaire and ethical audit, which we then assess for ethical trade risks, including modern slavery.

We have an escalation process where serious issues affecting working conditions are found in our supply chain, they are formally escalated to the ethical trade steering committee; an action plan for remediation with agreed timescales will be developed and agreed upon by the group and communicated to all relevant stakeholders. A review process will follow to ensure our policies and procedures are still being followed and reflect our core values.

## 8. Risk assessment and management

Assessing and managing risk both internally and externally is crucial to ensuring an ethical supply chain. Consequently, this is something of critical importance to apetito, and we, therefore, use a range of different tools to support our supplier risk assessments, and internal risk assessments and to determine supplier auditing requirements.

One of the tools we use for managing risk across our Supply Chain is Sedex (Supplier Ethical Data Exchange), a web-based system for suppliers to share ethical trading information with their customers to ease the burden on suppliers facing multiple audits, questionnaires, and certifications. Sedex is used at multiple different levels across the business to manage and better understand a range of information about our suppliers.

## 9. Actions

- **Training**  
Add additional training modules and materials to support learning and awareness of past induction on ethical trade and ETI Base code
- **Supply Chain Mapping**  
Enhance our supply chain mapping and risk assessment process to gain transparency and increase our understanding of our value chain using our existing strategic partnership with Sedex for support.
- **Supplier Management and Due Diligence**  
Deepen our engagement with suppliers to support better due diligence activities further down our value chain.

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