

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

## ANDROS UK

### 1. KEY DETAILS

- Policy prepared by : ANDROS UK Limited
- Approved by board / management on : 27<sup>th</sup> May 2022

### 2. INTRODUCTION

Modern slavery is a crime resulting in an abhorrent abuse of human rights. This statement has been prepared in line with the Modern Slavery Act 2015 and outlines how the Company manages and assesses its own operations alongside our suppliers to protect workers from being abused and exploited in our own Company and our supply chain.

### 3. DEFINITIONS

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 which highlights that slavery can occur in a number of forms and typically includes:

- **Slavery and Servitude** – the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ‘ownership’ of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a ‘serf’ to live on another person’s property and the impossibility of changing his or her conditions.
- **Forced or compulsory labour** – involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.
- **Human trafficking** – requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them.

### 4. RESPONSIBILITY

Whilst it is every employee's responsibility to be aware of and highlight any areas of potential risk, overall responsibility for ensuring that the Company, its associated organisations and supply chain are compliant in relation to the Modern Slavery Act 2015 lies with the Managing Director.

## 5. BUSINESS STRUCTURE

Our core business, within the UK, is the importing of jams, preserves, compote and our state of the art dedicated facility manufactures chilled desserts that are sold through the grocery, convenience, discounters, food service and industrial channels.

With an office in London and a manufacturing site (registered office) based in Oldford, Frome, Somerset.

Our team:

186 staff at the Oldford, Frome, factory

31 staff at the Hammersmith, London office

## 6. SUPPLY CHAIN

Our supply chain includes the sourcing of raw materials, products, packaging and services.

## 7. POLICY

We recognise that modern slavery is a complex supply chain issue and we work in partnership with our customers, suppliers and other organisations to sustain long-term solutions to this issue.

We are committed to acting ethically and with integrity in all our business relationships.

## 8. DUE DILIGENCE IN OUR SUPPLY CHAIN

We consider that the greatest risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable Anti-Slavery & Human Trafficking policy and processes. We expect each entity in the extended supply chain to at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

## 9. INVOLVEMENT IN MODERN SLAVERY

We will assess any instances of non-compliance on a case-by-case basis and will then tailor remedial action appropriately.

We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and those issues of noncompliance are not addressed in a timely manner.

## **10. TRAINING & AWARENESS**

We ensure that we have competent individuals within our Company who are aware of the standards we require.

## **11. WHISTLE BLOWING**

We have in place a **Whistle-blowing Policy** to encourage the reporting of concerns and the protection of whistle blowers.

## **12. REVIEW**

This statement will be reviewed annually, unless circumstances dictate that it should be reviewed and/or renewed more frequently.

## **13. QUESTIONS OR COMPLAINTS**

Should you have any questions regarding this statement, please contact:

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