

# **Modern Slavery Policy**

This document details the Elite Fine Foods Modern Slavery Policy.

### Introduction

Modern Slavery is a term used to cover the following offences as outlined in the Modern Slavery Act (2015):

- Slavery Servitude
- Forced or Compulsory Labour
- · Human Trafficking

#### **Elite Commitment**

Elite Fine Foods are strongly opposed to any form of Modern Slavery and will endeavour to ensure that none of its brands, ranges, and products are supplied by companies involved in any form of Modern Slavery.

#### Compliance

There are a number of procedures at Elite to ensure the company complies with the Modern Slavery Act (2015):

- 1. All companies are assessed before they can start to supply goods.
- 2. Most companies are members (or have accreditation from) SALSA (Safe and Local Suppliers Approval), BRC (British Retail Consortium) and/or ISO 9001 accredited. It is the Elite preference that the companies that supply brands, ranges, or products to us have this ISO 9001 accreditation.
- 3. In exceptional circumstances (and only on rare occasions) a company can supply goods to Elite Fine Foods without the membership or accreditation outlined in 2) above but only after an audit (which has a 21 point questionnaire), has been completed and the Elite Trading Director is satisfied that the company has met the criteria for the supply of goods.
- 4. For existing companies if any concerns are raised which are subsequently validated then the supplier of goods' contract will be terminated with immediate effect.





5. From time to time a company may also be audited by the Elite Department

6. For Elite colleagues checks are made to ensure that they have the right to work in the U.K. and the supporting documentation has been supplied for our internal checks.

## **Continuous Improvement**

It the aim of Elite to continually review our current practices in relation to Modern Slavery (and the Modern Slavery Act (2015)).

We conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from staff, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

Any suppliers that do not have suitable accreditation are subjected to an audit which result in no concerns being raised.

There are no concerns raised during adhoc audits.

## **Reporting Instances of Modern Slavery**

Any concerns regarding instances of Modern Slavery should be reported to the Trading Director.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

This policy has been approved by the Leadership Team and the Managing Director.

