

## **Anti-Slavery Policy Statement**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Pabulum has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

At Pabulum we have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, subcontractors, seconded workers, contractors, external consultants, third-party representatives and business partners.

### Report of outcomes and intentions for 2021

- **Staff awareness.** During 2020 we have communicated our approach and policy via routine operations conference calls (held on Mondays) plus published the policy on our internal intranet (Pabunet); these have been conducted by the HR Manager. This will continue in 2021.
- **Assurance arrangements** for suppliers and partners. During 2019, we secured confirmation from 95% of our suppliers and partners that they have Anti-Slavery policies in place. During 2020 this was held in abeyance due to COVID and a large reduction in purchasing of services/products. During 2021 we will conduct risk assessments for each supplier with direct and indirect labour resource.
- **Major supply chain procurement contracts.** During 2021 we will seek to include certain obligations relating to modern slavery and any applicable policies or supplier codes of conduct. The code of conduct would set out an organisation's expectations with regard to preventing modern slavery in its supply chain. To assist in managing the risk of modern slavery in the businesses of indirect suppliers (ie Bidfood and Foodari), such a code would include an obligation on direct suppliers to take measures to ensure that their own supply chains are free from modern slavery.

The Board further directs that, on a quarterly basis, it shall review a number of KPIs associated with this policy.

27<sup>th</sup> February 2021