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## **UK MODERN ANTISLAVERY ACT 2015 – LAMEX FOOD GROUP LIMITED’S STATEMENT**

### **Our Business**

Lamex Food Group Limited, headquartered in the UK, is an import/export company operating primarily in poultry, pork, fish, fruit, vegetables, and honey.

Lamex has 21 offices in 14 countries and through these offices, Lamex commercial personnel operate internationally to develop sustainable product outlets for their suppliers and long-term supply solutions for their customers.

### **Our Supply Chain**

Lamex is a diverse organization with several business segments, operating in many countries, with varying economic conditions for its operations.

The majority of Lamex’s activity is carried out in the EU and in the USA which we consider to be low risk in relation to Modern Slavery. Nevertheless, Lamex’s supply chain is a worldwide one, sometimes in high risk countries. We recognize that slavery exists worldwide, and we take a vigilant approach regardless of the location of our supply chains. Furthermore, the relationship with many of our suppliers has been established over several years and all new suppliers must be prequalified through a series of audits, whilst established suppliers have regular audits.

### **Our values and ethos**

At Lamex Foods, our ethos is partnership. We are committed to supplying outstanding service, quality and value, never forgetting that our relationship with our customers is key to our success. We strive to ensure that we provide our customers with long term supply solutions. This often entails utilizing our in-house, highly qualified technical team to carry out plant audits and on-site Q/A programs with our partners. Together we are creating new products, testing new markets and evaluating our strategy with our partners. We are confident that our strategy of partnership will bring continuous success to both Lamex and our partners across the globe.

### **Our Risk Assessment**

Lamex respects international human rights, including labour rights and recognizes its ability to

influence its supply chain. We continue to assess the potential human rights risks of our supply chains by considering the country of origin from which we are sourcing products. We continue to challenge ourselves and constantly assess our own operations for potential risks.

Since last year, we consider the type of work being carried out (mechanical vs. manual) and the type of labour (permanent, seasonal, agency). Stakeholders and our own experience indicate that there are likely to be higher risks of slavery where there is a manual process, such as harvesting or washing and that the risks can be compounded where work is seasonal rather than year-end round. Seasonal work tends to rely on labour providers which cause complexity in the supply chain. Migrant or refugee workers tend to be an even higher risk because they are more likely to lack support networks, particularly where they may not be legally registered in the country of work.

We also gather intelligence about emerging risks through our strong relationships with local groups and organisations. Campaigns and media investigations can also play an important role in helping us identify where some of the biggest risks lie. This combined risk and intelligence approach helps us determine where the most salient and material risks are in our supply chain.

As the next stage of our risk assessment, we consider working more closely with our suppliers to upskill them so that they understand the risks, take ownership of the challenges, collaborate with other businesses and work to devise strategies for their resolution. With this effective collaboration we believe that we will increase transparency within our supply chain, and we will develop practical, scalable and sustainable solutions to identified common problems.

### **Our Policies on slavery and human trafficking**

We believe that modern slavery is a crime and a violation of fundamental human rights. We are committed to establishing high standard of ethical and environmental practices and we believe that we have a responsibility to adhere to the highest standards of behavior and care. We commit to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business, with policies which contribute to that goal. We are striving to ensure that child labour, coercion and harassment, health and safety, involuntary labour, discrimination, abuse of human rights, bribery practices, have no part of our supply chain. We actively encourage fair trade principles and membership of SEDEX. Our Antislavery Policy reflects our commitment

to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain. We constantly seek to conduct our business in an honest and ethical manner and to ensure that workers involved in the production of products sold by Lamex from direct and indirect suppliers are treated with respect and dignity. Our Board of Directors has approved an Anti-Slavery Policy as of 01.05.2018 and Anti-slavery is one of the regular items in every Board of Directors' Meeting.

### **Our High-Risk Areas**

Having assessed our structures and our supply chains we continue to believe that the areas at highest risk of modern slavery are the growing and harvesting of raw materials. This year we have focused on honey that we purchase mainly from Mexico.

We have also been reviewing our meat suppliers in Thailand and Brazil and conducting traceability on the products that go into our packaging.

### **Due Diligence and Monitoring**

We operate a supplier policy and maintain an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence includes an online search to ensure that has never been convicted of offenses relating to modern slavery, a self-assessment questionnaire and onsite audits where feasible.

We are actively encouraging suppliers and customers to obtain SEDEX registration. During 2018-2019, we have continued to complete a self-assessment questionnaire with our core and non-core suppliers, and we are in the process of evaluating their responses. Via this risk assessment, we collected data regarding our suppliers' labour standards such as working hours, wages, children and young employees, freedom of association, non-discrimination, working conditions, safe and hygienic, forced labour and human rights.

This risk assessment concluded that our biggest challenge was in our purchases from Mexico, Thailand and Brazil. Therefore, all our Mexican honey and agave suppliers are required by our supplier approval procedure to be members of SEDEX and link to us on the system so that we have access to their completed SAQ. In addition, we carry out audits with 3 years' frequency as

a minimum. Regarding, our Mexican suppliers that are not SEDEX registered, they are obliged to complete our ethical trading questionnaires, which cover the ETI base code requirements. Furthermore, we regularly audit our Thai and Brazilian suppliers' plants and we encourage them to be SEDEX registered.

### **Our Attitude to Whistleblowing**

We continue to encourage our employees to report any practice which concerns them so that we can take steps to stop it or minimize it, wherever it exists in our business and our supply chain.

### **Informing our employees**

As we believe that our employees are crucial to helping us ensure that Modern Slavery Act is adhered to throughout our operations, business and supply chain, we are providing effective awareness training to our UK Employees, so that they will know what to do and how to report any issues of which they may become aware. Lamex supports the "Stronger Together" initiative and members of the staff receive training by attending relevant workshops. In addition, our compliance team has attended external courses on recognizing the signs of possible hidden labor exploitation and strengthening the compliance procedure. We plan to extend this programme to our Group employees. We also plan to support our suppliers in understanding and implementing the needed standards for improving labor rights and working conditions, including measures for preventing slavery and human trafficking.

### **Future measures**

Lamex has no tolerance of slavery and human trafficking. In 2020, we will:

- continue our mapping of our Core and Non-Core Suppliers,
- continue encouraging our suppliers to register to SEDEX,
- perform a risk assessment,
- seek to ensure that we have no high-risk suppliers within our business,
- regularly audit our suppliers' plants,
- continue providing modern slavery awareness training to employees,
- seek to appoint Safeguard Officers responsible for any risky territory we subsequently identify

after our risk assessment procedures,

- monitor our Core and Non-Core Suppliers,
- perform due diligence and monitor our suppliers (new and existing),
- adhere to the new Anti-Slavery Policy that we have in place as of 01.05.2018 to combat modern slavery and human trafficking,
- implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

This statement covers the UK legal entities of the group including Lamex Food Group Limited, Lamex Foods Europe Limited, Lamex Foods Europe (N.I.) Limited, Lamex Agrifoods Limited. The steps taken to tackle modern slavery in the business and supply chains cover all the above mentioned Lamex entities.

This statement is pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the upcoming financial year, as it has been approved by the board of directors of Lamex Food Group Limited. The statement for the previous year can be found [here](#).

For and on the behalf of Lamex Food Group Limited



Lamex Food Group, CEO

Phillip Owen Wallace