

UK MODERN ANTISLAVERY ACT 2015 - LAMEX FOOD GROUP LIMITED'S STATEMENT COVERING ALL UK LAMEX ENTITIES

INTRODUCTION

Modern slavery is the severe exploitation of other people for personal or commercial gain. Modern slavery is all around us, but often just out of sight. Modern slavery has many forms such as human trafficking, forced labour, debt bondage/bonded labour, descent-based slavery, slavery of children.

OUR VISION

We believe everyone, everywhere has the right to a life free from slavery. We acknowledge that slavery might exist in all stages of the supply chain, from the picking of raw materials to the manufacturing of goods, and at the later stages of shipping and delivery to consumers. We strongly believe it is time to create an economy where people are never exploited to produce the goods we buy. We have a responsibility to ensure that no slavery is used in production of the goods we sell. Eliminating modern slavery from food supply chains remains at the heart of our commitment to protect the human rights of everyone who contributes to our business.

OUR BUSINESS



Lamex Food Group Limited, headquartered in the UK, is an import/export trading company operating primarily in poultry, pork, fish, fruit, vegetables, and honey. Lamex has twenty-two offices in fourteen 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.

VALUES AND PRINCIPLES

ETHOS:
A mutual partnership to bring continuous success to us and our partners across the globe.

TRUST:
Build a trust relationship with our suppliers and provide customers with long term solutions.

INTEGRITY:
Being honest with our partners.

SUSTAINABILITY:
Working for a greener future.

FLEXIBILITY AND AGILITY:
Finding solutions to keep our supply chain uninterrupted even in toughest of times (such as encountered during the Covid pandemic).

LOYALTY:
Towards our people, our business partners, and our values, committed to supplying outstanding services, quality, and value.

TRANSPARENCY:
Build a resilient supply chain, engage, and collaborate to empower us and our partners to maximize the positive impact.

AMBITION:
Driving developments for us, our people and our partners and expand geographically.

EXCELLENCE:
Utilize in house, highly qualified personnel.

RESPECT:
Our relationships with suppliers and customers and our values.

We all have responsibility to protect our Company's reputation in everything we do or say. This includes:

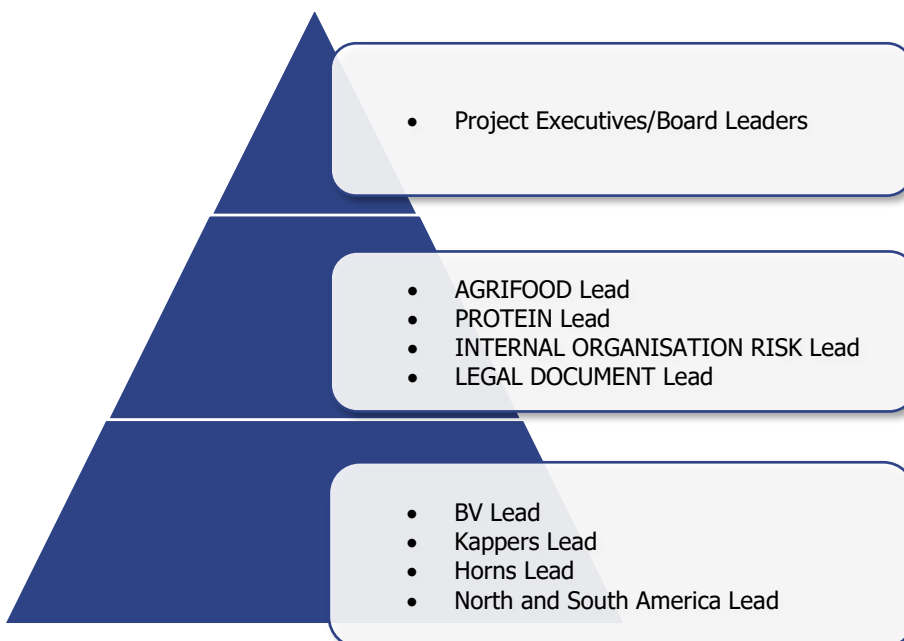
- Complying with all applicable laws in all countries in which we operate.
- Conducting our business in a professional manner with the highest standards of honesty and integrity.
- Following Company Policies and Procedures.
- Collaborating with our suppliers, customers, and third parties to ensure our high ethical standards are upheld throughout the supply chain.
- Seeking guidance when needed and always doing the right thing.

PROJECT INTRODUCTION

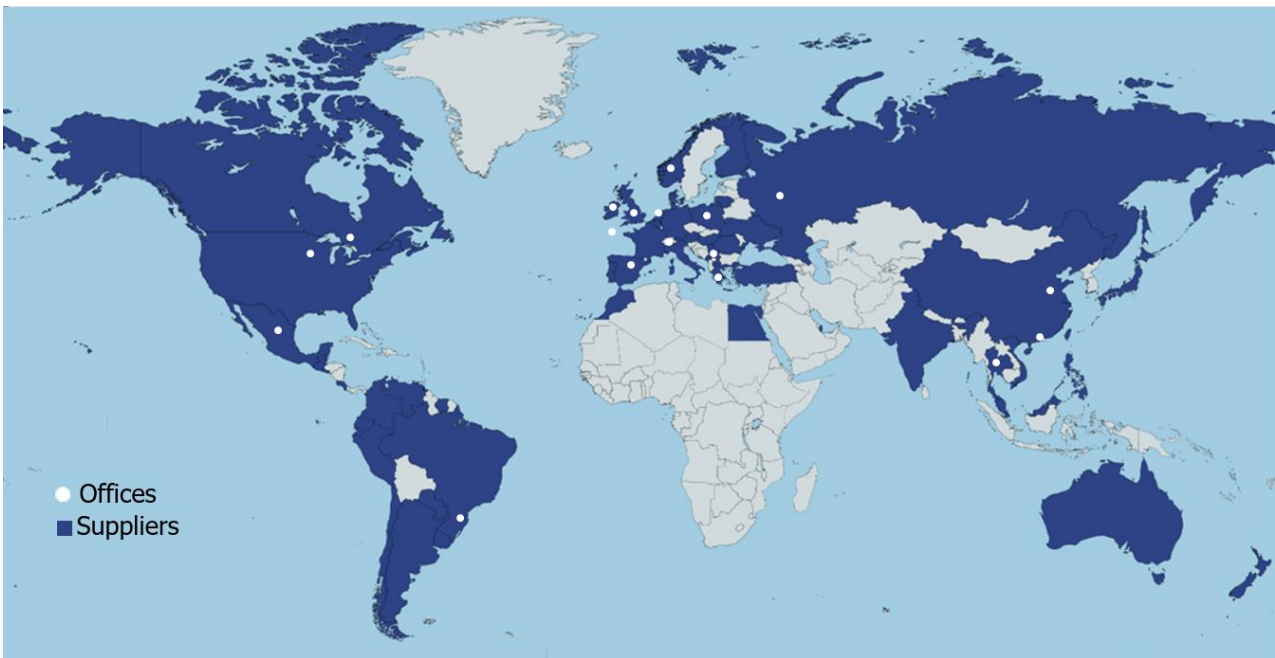
Recent changes to Modern Slavery Act (2015) for the UK highlighted the necessity for Lamex to perform an internal compliance audit and to ensure that our supply chain partners are compliant. This project forms part of a larger compliance program with a longer duration. Lamex plans to adopt a phased approach based upon statistical risk/likelihood to prioritise elevated risk areas and high-risk countries as advised by the UN Slavery Index and the SEDEX Risk Assessment tool. Risk areas are identified using the UN Guiding Principles on Business and Human Rights are safety and health, working hours, freedom of association, forced labour, child labour, rights to privacy, equality/non-discrimination. The aim of this project is to ensure that Modern Slavery Act is upheld across the Lamex Supply Chain worldwide.

GOVERNANCE

Responsibility sits with Lamex Group's Board:



OUR SUPPLY CHAIN



Characteristics of our supply chain

- 1 • Global Supply Chain
- 2 • Diversity of suppliers (from small farmers to multinational companies)
- 3 • Agricultural and Protein Products
- 4 • Short term vs long term suppliers
- 5 • Vulnerable workers (migrant workers, seasonal workers mainly in our AgriFoods sector)
- 6 • Suppliers' groups (ingredients, packaging, contract manufacturing, selected services such as cleaning companies, hauliers etc)
- 7 • Geographical, economic and social criteria to determine points in our supply chain where the risk is higher

OUR RISK ASSESSMENT (to be continued this year)

1. Mapping of our supply Chain

We will map our supply chain to analyse:

- Geographical risk and exposure
- Agricultural risk (seasonal workers)
- Social risk (migrant workers)
- Gathering intelligence about emerging risks through our strong relationships with local groups and organisations (ex. customers' such as M&S, Tesco, KFC onboarding processes, initiatives etc)
- Due diligence process in place before engaging a supplier (new KYC processes and sanction testing prior to supplier approval)
- Communication with suppliers which includes:
 - a) One to one communication (our commercial and technical teams have regular communication and work closely in partnership with our suppliers to ensure our operations remain free from MS).
 - b) Face to face (we visit our suppliers to see first-hand how their businesses are operating); Post Covid we use our best endeavours to visit our suppliers at least once every year.
 - c) Third party verifications.

2. Our employees

We are compliant with the National Living Wage requirements. We minimise the use of agency labour and ensure compliance with all aspects of the relevant domestic employment legislation and the ILO standards.

3. 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 and the use migrant workers.

4. Mitigation

Suppliers

- We hold long term relationship with our suppliers.
- We encourage membership of SEDEX by our suppliers. More than 60% of suppliers of our UK and European Entities are SEDEX registered, and many others adhere to similar structures such as BSCI Code of Conduct or complete questionnaires/confirmations to ETI Base Code.
- We impose contractual obligations to our suppliers (MS clause in our purchase T and C's and our master contracts).

- We undertake Third Party Audits when required.

Our company

- We have a whistleblowing policy for our staff.
- We participate in the education of our staff who have reason to visit our suppliers, primarily commercial staff, and quality assurance.
- We participate in the "Stronger Together" initiative and training.

OUR POLICIES

These include

- Business Code of Conduct
- Suppliers Code of Conduct
- Whistleblowing Policy
- Human Rights Policy
- Modern Slavery Policy
- Antibribery Policy
- Health and Safety Policy
- Recruitment Policy
- Equality/Non-discrimination Policy
- Ethical Trading Policy

DUE DILLIGENCE AND MONITORING PROGRESS

The working group regularly report to Lamex Group Board and their progress reviewed on a quarterly basis.

NEXT STEPS

We will continue:

- Our mapping of our Core and Non-Core suppliers. During 2022 we have risk assessed 100% of suppliers of our UK Protein and Agrifoods Entities. During 2023 we will continue with mapping the suppliers of our other EU entities.
- Encouraging our suppliers to register with SEDEX.
- Performing a risk assessment of our new suppliers.
- Performing due diligence and monitoring our suppliers (new and existing).
- Regularly auditing our suppliers' plants either on site or remotely due to COVID.
- Reflecting lessons learned into our future strategy.

We will:

- Hold monthly compliance meetings inviting our Group key employees and discuss about MS and other Ethical compliance concerns.
- Provide modern slavery training to employees to raise awareness of our corporate responsibility and make them alert of the signs of MS.
- Review and Update our Group Policies and update our Employees Handbooks (Disciplinary, Grievance, Equality and Diversity, Harassment and Bulling, Modern Slavery).
- No new supplier will be approved unless we perform a due diligence check (KYC and sanctions testing).
- Producing a Master Corporate and Social Responsibility Policy covering all Environmental and Ethical aspects.
- Provide a copy of our Modern Slavery Statement, our Suppliers Code of Conduct and our Business Code of Conduct to our suppliers.
- Increase the percentage of our suppliers registered with Sedex.
- Implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

REFERENCES

1. International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
2. United Nations (UN) Guiding Principles on Business and Human Rights
3. UN Global Compact
4. UN 2030 Sustainable Developments Goals
5. OECD Ending child labour, forced labour and human trafficking in global supply chain
6. International Bill of Human Rights
7. Gangmasters and Labour Abuse Authority (GLAA)
8. Supplier Ethical Data Exchange (SEDEX)
9. Stronger Together Initiative
10. Food Network for Ethical Trade (FNET) Initiative
11. Business and Human Rights Resource Centre

This statement and the steps outlined covers all Lamex Entities including the UK Entities: Lamex Food Group Limited, Lamex Foods Europe Limited, Lamex Foods Europe (N.I.) Limited, Lamex Agrifoods Limited, KappersFoods UK Limited.

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 fiscal year, as approved by the board of directors of Lamex Food Group Limited on the 12th of January 2023. The statement for the previous year can be found by following the link [here](#).

For and on the behalf of Lamex Food Group Limited

Signed by

Phil Wallace, Group's CEO