

JDM FOOD GROUP MODERN SLAVERY STATEMENT 2024

This statement sets out JDM Food Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. JDM Food Group Ltd complies with the provisions of the UK's Modern Slavery Act 2015 and the duty it places on businesses to disclose publicly the steps they are taking to tackle forced labour and human trafficking. This statement was published on the 20th February 2024 and relates to actions and activities during the year 1st January 2023 to 31st December 2023.

As part of a global food supply chain, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

- JDM Food Group Ltd operates in some of the largest food markets around the world and works with a diverse global supply chain. JDM Food Group Ltd is a key provider of a vast range of prepared foods from its single site in Lincolnshire.
- JDM Food Group Ltd operates from within the UK. It supplies retail, manufacturing customers, food service and home delivery meal sectors here in the UK and abroad.
- JDM Food Group Ltd imports raw materials and packaging globally and its supply chain extends from Europe, China, Latin America, India as examples.

The following is the process by which the company assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

- JDM Food Group Ltd is an A/B member of SEDEX (Supplier Ethical Data Exchange) and undertakes the four pillar SMETA audit every two years. The last audit was undertaken in 2023 and the results of which are contained within our SEDEX site database. We have an Ethical Policy based upon the Ethical Trade Initiative key principles and is applied to all our activities. We are members of Stronger Together.

The following activities are at elevated risk of slavery or human trafficking:

- Our UK operation is considered elevated risk. Our risk assessment concluded that the site is high risk due to the presence of non-UK European workers and the use of a GLAA certified Labour Provider. We ensure that we apply all appropriate

controls when recruiting staff and ensure that their welfare is of paramount importance. Our SMETA audit is undertaken to provide a third-party assessment of our organisation's compliance to the provisions of the UK's Modern Slavery Act 2015. Our Labour Provider is a member of SEDEX, our provider is certified by the GLAA and a member of the ALP/GEC. The agency does not sub-contract work and all employees are dealt with directly. The agency is audited by JDM Food Group Ltd at a frequency of every twelve months by the People department.

Responsibility for the organisation's anti-slavery initiatives are as follows:

Policies.

- These are researched, internalised, documented, trained, and monitored by several people on site headed up by the People Director.

Risk Assessments.

- Risk assessments shall be conducted during 2024 using the tools from within the Stronger Together site. The risks are considered from historical knowledge and knowledge of the sector in which we operate.

Investigations/due diligence.

- The People Director, Site Director, and Senior Managers as necessary would be involved in the investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. Where there is evidence of this, then the appropriate authorities shall be notified immediately for advice and involvement in resolving the issues.

Training.

- Key staff have undertaken training related to the Ethical Trade Initiative and the Stronger Together campaign and various other customer codes of conduct. The plan moving forward is for further expanded training to be delivered to a broader audience. The People Director, Site Director and key managers have attended external workshops on Modern Day Slavery. Further in-house training is planned for 2024 for Section Managers and Employee Forum Representatives.

Whistleblowing Policy.

- JDM Food Group Ltd encourages all its workers, suppliers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, suppliers, customers, or others who have concerns can use various confidential helplines to report such instances, including an independent line. All members of staff have the right to a confidential face to face meeting with a manager or the People Department to discuss their concerns. JDM Food Group Ltd have placed a number of Whistle-blowing posters

on notice boards in different languages appropriate to the staff on site and have their own Whistleblowing hotline.

Employee Code of Conduct.

- JDM Food Group Ltd has an Employee Handbook which makes clear to employees the actions and behaviours expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. This is referenced in the Anti-bribery and Anti-corruption Policy.

Employee Engagement.

- JDM Food Group Ltd is redefining the activities and membership of the current Management & Employee, Health & Safety Team. This seeks to enhance the activities of the team by including staff from different disciplines within the business. The activities, outputs and requirements shall have the support of lead Directors and Management on site.
- JDM operates an Employee Forum to engage with staff from all areas of the business to understand feedback from its employee community. Actions are recorded, agreed and feedback on the outcome of this information is to improve employee and worker communication, experience and engagement.

Key Initiatives:

- Launch of the EPIC Values and employee recognition scheme based on the company values.
- Employee Forum development provides a two-way exchange of ideas and support.
- Factory briefs conducted to give regular updates to colleagues.
- Employee Quality culture review to obtain feedback and initiate actions.
- Employee People survey to focus on employee wishes and needs.
- Frequent forums to allow for communication and in multiple languages

Supplier/Procurement Code of Conduct

- JDM Food Group Ltd is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. JDM Food Group Ltd works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. We ensure that suppliers are active members of SEDEX and where appropriate (China and South Africa) have undertaken a third-party ethical audit in the form of SMETA or SIZA. During routine audits by JDM Food Group Ltd staff, the arena of staff welfare and health and safety is checked. All Procurement, Sales and Technical staff who have contact with suppliers, contractors and customers are aware of the company's Anti-bribery policy and have been signed for by those members of staff.

Due diligence

- The organisation undertakes appropriate due diligence when considering onboarding new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:
- Mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier via SEDEX or our own Ethical Trade Questionnaire.
- Since 2019 JDM Food Group Ltd shall have created an annual risk profile for each of its suppliers.
- Participating in collaborative initiatives focused on human rights in general, slavery and human trafficking in particular "Stronger together" or "Ethical trading" initiatives.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Recruitment/Agency Workers Policy

- The organisation uses only specified, reputable and GLAA certified employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. These agencies must have a valid GLAA operating license, be members of SEDEX with a completed SAQ, hold full business insurance and documented policies for the recruitment of staff, induction, training, monitoring, and supporting all staff supplied to JDM Food Group Ltd. Our labour provider has an on-site office located next to the People office, with a member of staff co-ordinating all activities and working in hand with JDM Food Group Ltd staff.
- The labour provider is audited by the company every twelve months.

Performance Indicators

- The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation has carried out the following to date:
- JDM has significantly strengthened its People function with the recruitment of a People Director and added resource which focuses on recruitment, retention and compliance.
- KPI's are viewed weekly and give the ability to dissect any trends and concerns quickly.

Awareness-Raising Programme

- The organisation raised awareness of modern slavery issues by including a section related to business ethics, modern-day slavery, and whistleblowing lines within our first-day inductions of new staff. The GLAA videos are played at all inductions to share the closeness of the issue of Modern Slavery and to highlight the importance of reporting any concerns to JDM Food Group Ltd management in the strictest of confidence.

The handouts, posters and booklets all explain to staff the basic principles of the Modern Slavery Act 2015. They are displayed on site where individuals can see the information in privacy:

- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available, for example through the Modern Slavery Helpline.
- Whistle-blower helplines.
- Contact details for the GLAA.
- Contact details for key retailers.
- Internal support.

This topic shall receive the attention and support of all staff at JDM Food Group Ltd, and we continue to remain steadfast in ensuring that we are a fair and rewarding place to work for all our staff, suppliers, contractors, and customers.

This statement was approved in 2024 by the organisation's CEO who reviews and approves it annually.

Aisling Kemp – CEO