



MODERN SLAVERY STATEMENT

2022

This statement is published in accordance with the Modern Slavery Act 2015 and includes the steps we have taken during our 2021 financial year (ending December 31st 2021) to ensure that trafficking and modern slavery do not take place in our value chains – including both our own business and our supply chain.

We are committed to preventing slavery and human trafficking in our corporate activities and to ensuring our supply chains are free from slavery and human trafficking.

To date, there have been no identified instances of modern slavery within SHS Group, its subsidiaries, or its supply chain.

OUR ORGANISATIONAL STRUCTURE

SHS Group incorporates several subsidiaries as detailed below. Across our divisions we have a global supply chain spanning over 35 countries and have worked in partnership with several of our key suppliers for multiple decades.

Our products are supplied to several major UK retailers and other food manufacturers.

SHS GROUP SUBSIDIARIES

- 3v Natural Foods
- Beverage Brands (U.K.) Limited
- The British Pepper and Spice Company Limited
- Caledonian Bottlers PLC
- Charles Gordon Associates Limited
- The Crucial Sauce Company Limited
- M&P Sales and Marketing Limited
- Meridian Foods Limited
- SHS Group Limited
- SHS Sales and Marketing (GB) Limited
- SHS Sales and Marketing Limited
- Standard Brands (Trading) Ireland
- Standard Brands (UK) Limited
- Super Nuva LTD
- Woodchester Enterprises Limited
- Zip Fires Overseas European Trading Limited
- Zip Fires Overseas Sales Limited
- Zip Fires Overseas Trading Limited

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Human trafficking and slavery have no place in the modern world. We are committed to ensuring there is no modern slavery or human trafficking within our supply chains or in any part of our business and protecting our employees from exploitation.

We comply with or exceed all legal requirements surrounding employee rights, health and safety and ethical responsibilities. We have therefore developed policies, processes and procures across the SHS Group to reflect our commitment to acting ethically and sustainably and by implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chains. These include our:

- Anti-Slavery and Human Trafficking Policy
- Corporate Social Responsibility Policy
- Ethical Trading Policy
- Temporary Labour Policy – Divisionally specified

- Whistleblowing Policy
- Child Labour Policy

DUE DILIGENCE AND RISK ASSESSMENT AND MANAGEMENT

We have an extensive supply chain and recognise the risk presented by human trafficking and slavery within this.

We adhere to the principles of the Ethical Trading Initiative (ETI) along with specific requirements set by our customers' ethical standards. We therefore require suppliers to be fully aligned to the ETI base code within our supplier management process as a minimum standard.

We work to keep our supply chains as short as practicable. We review supplier performance frequently and audit suppliers regularly, basing frequency upon a number of factors including any inherent or increased risks of modern slavery and ethical considerations. All our supplier audits include ethical criteria based upon the ETI base code, including risks of modern slavery.

During 2021, our manufacturing divisions upgraded their Sedex membership as part of our continued work on risk assessment and management.

Permanent employment is better for colleagues and limits the risk of human trafficking or modern slavery within our business. Where we use agency workers this is to fill short – term employment needs and we only use long term partners that operate to our own high standards.

We also have established a transparent and open process to support our 1,200 employees in raising concerns through a Whistleblowing telephone line, run 24/7 by an independent third party

TRAINING

We provide our HR and Operations employees with training to help them identify potential issues and how to deal with this.

ACTION TAKEN TO ADDRESS MODERN SLAVERY

We use supplier performance scorecards and KPIs as part of our supplier risk management. We regularly review our suppliers and include ethical considerations and criteria, including those around risks of modern slavery and child labour within the chain. We use resources such as Sedex to support with our work on this. Sustainable Sourcing is one our key priority areas in our sustainability strategy.

In 2021, our British Pepper & Spice business launched a new bespoke sustainability risk ranking and supplier scorecard as part of their 2025 sustainability objectives. This included risk assessing over 160 countries inherent sustainability risks and collating best practice guidance and data.

We are also members of various organisations promoting responsible business such as Business in the Community. In 2021, we received the BITC NI Core Responsible Business Standard as part of our continued responsible business progress.

During our 2022 financial year, we will be doing the following:

- Building upon our staff awareness of the risks and impact of modern slavery.
- Building upon SHS Group's due diligence and impact assessments for its raw materials and suppliers in relation to human rights and sustainability and using resources such as Sedex RADAR to support this.
- Continually reviewing and strengthening our supplier approval and management process to ensure sustained improvement.
- Agree Key Performance Indicators to measure our progress against the above actions.
- Continuing the roll out of an English Language programme to provide employees with the necessary skills to support them in raising concerns.

PERFORMANCE MEASURES AND ACTIONS

It is important for SHS Group to be transparent and accountable in our actions and therefore we have identified a set of KPI's. These KPI's will be reported annually within this Modern Slavery Statement and reviewed enable us to identify risk across our business and through our supply chain to drive improvement.

Key performance indicators:

- % of SHS Group sites to have completed Modern Slavery awareness training
- % of SHS Group sites to have completed the Modern Slavery Risk Assessment (Stronger Together)
- % of SHS Group sites to have completed a labour provider ethical audit annually
- % of SHS Group sites to have completed a labour provider audit every 6 months, which also includes employee interviews
- 100% of Whistleblowing cases closed out

Signed by:



Date: 05 07 22