

Modern Slavery Statement 2022

Bakkavor

Chief Executive's Introduction

As the UK's leading provider of fresh prepared food, with a growing international presence in the US and China, Bakkavor is clear about its corporate responsibilities and the example we must set within our industry.

Our stance on human rights is an essential part of this. Across the Group, we are committed to maintaining the highest standards of employee welfare and safety. We are also clear with our suppliers of the importance of respecting human rights, and we work with our supply base to ensure they are able to meet the standards required, and that our expectations are understood and upheld.

At Bakkavor we invest in our people and innovate to deliver responsible growth that is inclusive for all. Our values are vital to us and will never be compatible with any form of modern slavery. That is why we are committed to raising awareness and action on this issue through internal campaigns and ongoing training programmes that enable our people to know the indicators of modern slavery and how to report them. We have several teams who are specifically tasked with forming and implementing our approach to tackle modern slavery and other important social governance issues. We also have an established Group Environment, Social and Governance (ESG) Executive Committee that drives our Trusted Partner (ESG) strategy across our business and a newly implemented Group Board ESG Committee, which has ultimate responsibility for our ESG activities. We are also an active partner of Stronger Together, the multi-stakeholder initiative that aims to tackle modern slavery through training and information sharing.

We are proud of the work we have done and continue to do in this area, but we are not complacent and will continue to make sure that Bakkavor is meeting the highest ethical standards for our customers, suppliers and, most importantly, our employees. These exceptional people are the heart of our business, and their welfare and safety will always remain our top priority.

Signed

Agust Gudmundsson
CEO, Bakkavor Group plc

28 June 2022

This statement is Bakkavor's latest Modern Slavery Statement and relates to the year ending 31 December 2021. In scope it covers Bakkavor Group plc and relevant group subsidiaries (listed below). Bakkavor Group plc and its subsidiaries are referred to as "Bakkavor" or "the Group" throughout this Statement.

Bakkavor (London) Limited	Bakkavor Limited
Bakkavor Estates Limited	Bakkavor Holdings Limited
Bakkavor Finance (2) Limited	Bakkavor Foods Limited
Bakkavor Finance Limited	Bakkavor USA Limited
Bakkavor Central Finance Limited	Bakkavor China Limited

In January 2021, Bakkavor established the ESG Executive Committee, a cross-functional group of senior leaders who are responsible for cascading, embedding and implementing the Group's Environment, Social and Governance (ESG) strategy, Trusted Partner, across the business, including the priorities outlined in our previous modern slavery statements. A commitment to human rights underpins both our ESG strategy and responsible sourcing model and is central to how Bakkavor operates its day-to-day business activities.

In this statement we set out the activities we have undertaken in 2021 to tackle the issue of modern slavery within our own business and down our supply chain. This includes the results of our second independent organisational performance assessment to check on our progress since 2018.

OUR BUSINESS AND SUPPLY CHAINS

Bakkavor is the UK's leading provider of fresh prepared food with a growing presence in the US and China. We operate from over 40 sites and develop and manufacture over 3,200 different fresh prepared food products. Our sites include 23 factories and four distribution centres in the UK, plus a Group head office in London, nine factories in China plus a regional head office in Shanghai and five sites in the US and a regional head office in North Carolina. We employ over 19,000 people and have Group revenue of £1.9 billion.

We source about 11,000 raw materials from over 600 suppliers from more than 50 countries – from small farmers to multi-national operators. They, in turn, work with thousands of their own suppliers who grow and move hundreds of raw materials across global supply chains. Underpinning the safety of our products ensures the integrity of this supply chain, all the way from an initial risk assessment through to supply chain mapping.

IMPACT OF CORONAVIRUS PANDEMIC AND LABOUR SHORTAGES

The coronavirus pandemic continued to impact on the business during 2021 along with the additional pressures derived from shortages of labour. Our action plans for both our own operations and the supply chain reflected these challenges. We are pleased we were able to continue to make progress throughout 2021.

OUR VALUES

We are proud to be a values-led business. In 2021, we worked with our people to refresh our values to ensure they represent what is important to all of us. They focus on working together, being open and honest with each other and ensuring that we treat all colleagues the same.

Our vision and purpose are underpinned by these values and are the foundation of our culture. They guide our behaviours and reflect who we are today and aspire to be tomorrow.

Our refreshed values are:

Respect and trust each other:

- Treat each other fairly and include everyone – we're all on the same side
- Care for and support each other to achieve our goals
- Build confidence and have trust in one another
- Listen to each other and recognise everyone's contribution – we can all make a difference

Keep the customer at the heart of what we do:

- Always value and protect our customer partnerships
- Maintain our commitment to the highest standards of food safety, integrity and quality
- Innovate to help customers stay ahead
- Stay agile and work together with our customers to anticipate future needs

Get it right, keep it right

- Uphold our standards and be consistent every day
- Stay safe and look after ourselves and each other
- Take responsibility for the impact of our actions on the environment and in our communities
- Be fit for the future – learn from our mistakes and invest in our skills

Be proud of what we do

- Aim high, value our efforts and always go the extra mile
- Be positive, celebrate and share our successes
- Inspire others to work with passion and enthusiasm
- Look for ways to improve the way we work

Our commitment to help end modern slavery reflects our values. In particular, we are committed that our supply chain operations, both upstream and downstream, should have a positive impact, creating opportunities for people all over the world.

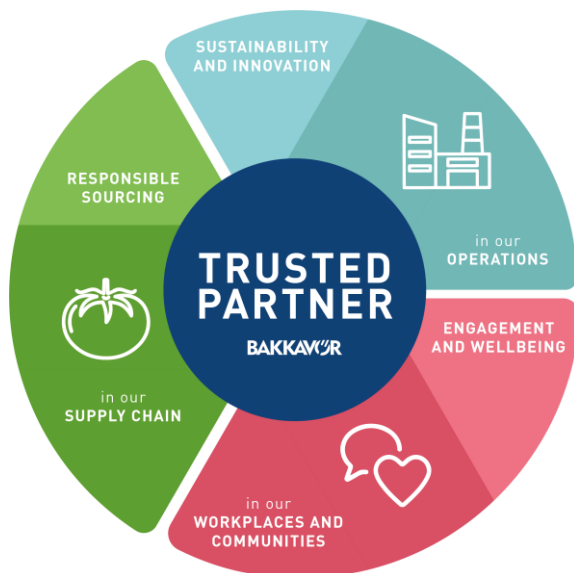


OUR MODERN SLAVERY POLICY

As part of our commitment to human rights, as a business we work with our supply chain partners to ensure adherence to the highest standards of behaviour and care, and to identify and tackle all forms of slavery and human trafficking. We have a consistent approach within our own operations and our supply chain.

In 2021, we continued to embed our Group ESG strategy. This strategy builds on our existing work programmes and focuses our efforts on a set of forward-looking commitments.

The strategy, Trusted Partner, is built around three focus areas that represent the value chain of our business:



Responsible Sourcing: prioritising transparency and collaboration in our supply chain on environmental and social issues.

Sustainability and Innovation: in our own operations to reduce our impacts on the environment.

Engagement and Wellbeing: providing a safe and inclusive environment for all our colleagues to thrive.

The Trusted Partner commitments includes commitments to human rights both within Responsible Sourcing and in Engagement and Wellbeing. These include:

RESPONSIBLE SOURCING

Supply Chain Human Rights

Supply chain assessment (human rights) – Use our supplier management tools to identify suppliers deemed ‘high risk’ on our combined risk approach for our UK business.

Extend supplier management tools to our US and Asia businesses to expand our human rights risk mapping.

Corrective action and remedy – Work collaboratively with our suppliers on any breaches of our Code of Conduct to develop and implement a clear and appropriate corrective action plan.

Worker voice – Empower worker voice and collaborative dialogue within our direct supply chain by promoting independent whistleblowing channels and effective grievance reporting mechanisms.

ENGAGEMENT AND WELLBEING

Responsible Recruitment and Employment

Modern Slavery Awareness – drive awareness and action on the issue of modern slavery, rolling out campaigns and training so that our colleagues know the indicators and how to report them

Labour Risks Assessment - lead our industry on rolling out completion of the new Self-Assessment Questionnaire ('SAQ') and new risk assessment (UK sites for 2020, and Group wide for 2021)

Labour Provider Standards - work only with UK Labour Providers that are Gangmasters and Labour Abuse Authority (GLAA) licensed, commit to the Responsible Recruitment Toolkit and work towards the standards (from 2020)

In 2021, we sought to further embed our Trusted Partner strategy across the business by enhancing governance and increasing accountability, which is summarised on page 38 of our Annual Report. Overall leadership for ESG is with Donna-Maria Lee as Chief People Officer, supported by the CEO, Agust Gudmundsson at Board level. The ESG Executive Committee has oversight of the ESG strategy and performance against commitments and is chaired by Sally Barrett-Jolley, Head of Corporate Affairs.

We have a clear responsible sourcing strategy, through which the business manages supply chain risks including those related to human rights. This is overseen by a dedicated Responsible Sourcing Steering Committee comprised of representatives from procurement, technical and HR which reports to our ESG Executive Committee.

In addition, our Group Human Rights and Ethical Programme is driven by our ethical trade team, formed of a nominated Head of Human Resources, two Senior HR Business Partners and an ethical trade specialist.

The team's purpose is to ensure that our own operations understand and comply with the required ethical standards, to develop ethical policies and processes, provide training and support, and to develop and agree the Group's ethical trade and modern slavery action plans.



Responsible Sourcing

Risk assessment – Own operations and supply chain



The Responsible Sourcing Steering Committee was established in 2017 with wider involvement from senior managers in technical, procurement and HR.

The Bakkavor Responsible Sourcing Model is now a fundamental part of the way the business manages supply chain risks including Human Rights and People

OTHER RELEVANT POLICIES

The following policies underpin our approach to tackling Modern Slavery in our own business and our supply chain:

- Anti- Bribery and Business Ethics Policy
- Bakkavor Code of Conduct
- Human Rights and Ethical Trading Policy
- Inclusion and Diversity Policy
- Responsible Operations Policy
- Whistleblowing Policy
- Supplier Code of Conduct
- Anti-Money Laundering Policy
- Group Remediation Policy (new in 2021)
- Forced Labour Response Plan Policy (new in 2021)

RISK ASSESSMENTS AND AUDITS WITHIN OUR OWN OPERATIONS

Our approach to risk assessments and audits remains unchanged, and we are constantly assessing our own operations including for potential risks.

The Bakkavor Human Rights and Ethical Trade Programme is based on the UN Guiding Principles framework and brings together all the activities undertaken at Group and Site level into a common framework, explaining the activities under each pillar and enables us to identify key gaps to be addressed.



BAKKAVOR HUMAN RIGHTS & ETHICAL PROGRAMME 2021



The activities highlighted in bold were identified as gaps and additions to our programme in 2021.

It is our policy for our own operations to have a third-party ethical audit every four years, or sooner if required by our customers (most do not require us to have one anymore). If ever non-compliances are identified, we take a zero-tolerance approach, and close them out as soon as possible. In 2021, we resumed third-party ethical auditing following the postponement caused by the COVID-19 pandemic and five Bakkavor sites completed their delayed audits.

We continue to be an active Buyer/Supplier (AB) member of SEDEX (Supplier Ethical Data Exchange) playing a leadership role in SEDEX which includes providing feedback on our experiences of using the platform as well as input into their system development programme.

As one of our Trusted Partner commitments, we have been a leader in the roll out of the new SEDEX SAQ and RADAR risk assessment tool. All UK Bakkavor sites completed the new SAQ in 2020, providing each site with a SEDEX risk score and management control score. In 2021, we carried out a review of the SAQs to ensure consistency and accuracy. All Bakkavor sites in the UK have achieved a low risk SEDEX risk rating. In 2021, Bakkavor Hong Kong completed the SAQ for the first time and they have a medium risk rating.

Bakkavor has worked with [Stronger Together](#) – the multistakeholder initiative working to tackle modern slavery - from its formation, and we have supported the development of the training workshops as well as the guidance and toolkits that are now available.

All sites complete our Bakkavor Modern Slavery Risk Assessment and Stronger Together's [Employer Good Practice Implementation Checklist](#) on an annual basis. In 2021, we updated the Bakkavor Modern Slavery Risk Assessment to remove the duplication with the Stronger Together Good Practice Checklist. The updated version provides each site with a modern slavery risk rating. The Good Practice Checklist enables us to measure how well we are delivering our Human Rights and Ethical programme.

The site level results are combined to provide an overview of all the activity being carried out within our own operations and inform our annual Group Modern Slavery Action Plan.

In 2021, we continued to use the [Stronger Together Progress Monitoring Tool](#) at Group level. This is an online self-assessment that supports companies to measure their progress and to highlight their next steps in addressing modern slavery risks within their businesses and supply chains. As one of our key performance indicators, we are pleased to be able to report a significant improvement in our overall score to 77%.

We re-launched our free, anonymous and confidential whistleblowing hotline, 'Speak Up' that enables all employees, including agency workers, to raise any potential concerns including those relating to employment standards or ethics. The hotline is available Group-wide by Freephone or online 24 hours per day / 365 days per year and in 15 languages. Cases logged in 2021 were investigated thoroughly through local HR contacts, General Managers and/or Business Directors, as well as the Chief People Officer, Technical Director, General Counsel or the Chief Financial Officer when relevant. Information for the whistleblowing hotline is prominently displayed at all sites. In addition, whistleblowing is monitored by the Group Board at each Group Board meeting

GROUP MODERN SLAVERY ACTION PLAN 2021

The 2021 Modern Slavery Risk Assessment and Stronger Together Good Practice Checklist results were used to develop our second Group Modern Slavery Action Plan:

Actions	Status
<p>1. New internal audit process Implement an internal ethical audit process to verify the Bakkavor Ethical Trade and Human Rights Programme is embedded at each site and share best practice</p>	Completed
<p>2. Modern slavery awareness training Run "modern slavery and hidden labour exploitation" on-line training sessions for Site Employee Forum (SEF) and Trade Union (TU) representatives, HR and Operations managers. The purpose is to increase their awareness of the issue and become the 'eyes and ears' to identify any potential issues at site level.</p>	Completed
<p>3. Effective Remedy</p>	Completed

Actions	Status
Develop and implement a Forced Labour Response Plan policy and Group Remediation policy	
4. Responsible Recruitment Self-assess our direct recruitment process against the Responsible Recruitment Toolkit Standards and develop an action plan to make improvements year on year	Ongoing
5. Onsite Contractors Agree the onsite contractors to be covered by the modern slavery risk assessment process. Develop and implement the process.	Two options identified
6. Agency Labour Third Party Audits Implement an annual assessment process of all labour providers by independent qualified labour provider auditors	Completed

Other activities undertaken in 2021:

- **Internal Ethical Assessments** – implemented the new process to embed our Ethical Trade and Human Rights Programme at site level. The internal ethical assessments take place every four years and one year before the site's next third-party ethical audit. Six sites completed the assessment in 2021.
- **Third-Party Agency Labour Provider Audits** – we appointed [ESC International](#) and 14 audits were completed in 2021. The audit programme is be-spoke to Bakkavor and covers a management systems review, financial due diligence check, review against Bakkavor's terms of business, recruitment fee risk assessment, review of grievance procedures and feedback from agency workers.
- **Remedy and Remediation** – two new policies were signed off in 2021, the Group Remediation Policy and the Force Labour Response Plan Team Policy. Response plan teams were identified at each site consisting of the General Manager, HR, Modern Slavery Champion and a first aider
- **Stronger Together Organisational Performance Assessment** – in 2021 Stronger Together conducted our second organisation performance assessment to verify the progress made both internally and down the supply chain. Our overall Organisation Progress Score in addressing modern slavery risk of 77% is classed as 'impressive' and our management of internal systems and processes was found to be 'exceptional, with many robust features and internal monitoring of progress'. More details can be found below. The Group was very pleased that the assessment recognised the significant progress made since the first assessment in 2018.
- **Annual Review** – completed the second annual review of the Human Rights and Ethical Programme. This enables us to monitor our progress in addressing and reducing risk of modern slavery and make any necessary updates and changes to our programme.

- **Bakkavor sites tackling the issues of modern slavery** - examples of the activity that has taken place at site level during 2021 include:
 - **Highbridge** – A group of colleagues from East Timor were spotted being dropped off in a people carrier. We arranged for the drop offs to be observed over the coming nights and identified the same car again. After investigation, it was confirmed with a manager that the driver was a co-worker and had worked at the site a long time. The co-worker had established a relationship with the Timorese colleagues. Further checks established that none of the Timorese colleagues shared addresses but all living in a similar locale for pick up and drop off. We were satisfied there were no issues in relation to this, it was about convenience and car sharing.
 - **Harrow** – the Harrow Operational Team attended the ‘Modern Slavery and Hidden Exploitation for Operations Manager’ training and following that designed team briefs to communicate and raise awareness to colleagues of the indicators of modern slavery. In addition, they have co-ordinated a site modern slavery awareness quiz.

ASSESSMENT OF MODERN SLAVERY RISK WITHIN OUR SUPPLY CHAIN

Bakkavor was one of the founder members of the Food Network for Ethical Trade (FNET), an organisation set up to promote collaboration and an aligned approach to ethical supply chain management within food supply chains. Understanding the risk profile of our supply chain highlights those areas requiring focus, however it is often the case that an individual company’s ability to effect change in these areas is restricted due to limited leverage. FNET provides an effective vehicle for collaboration where members can work on shared precompetitive human rights risks. Bakkavor is involved in the Risk Assessment and Mitigation Working Group and the Raw Materials working Group.

From 2020 and continuing through 2021 there has been a significant focus around Covid, with FNET providing UK and Global updates trying to understand the potential implications of Covid and linked legislation in terms of human rights within key sourcing country supply chains.

SUPPLY CHAIN COLLABORATION: ITALIAN PRODUCE INDUSTRY

Italy continues to be an important supplier of fresh produce to Bakkavor, and we are continuing to build on our work referenced in previous years modern slavery statements.

Whilst not a member of the Ethical Trading Initiative (ETI), Bakkavor continues to be a member of the ETI Italy Working Group which focuses on identifying and addressing labour exploitation in Italian tomato industry, particularly Southern Italy. The group has been working in collaboration with a consultant who is based in Italy to create a local stakeholder platform to enable dialogue and collaborative working within the industry to improve the working conditions of vulnerable communities and individuals.

Since coming on-board the consultant has developed effective working relationships with key processors and has identified that there is a need to build the capability of

cooperatives to help their members understand and improve labour practices and working conditions.

Building on this, an engagement programme has been developed to update suppliers on legislative developments and industry expectations relating to ethical management. The sessions will support best practice by explaining risks common within Italian supply chains and what producers and suppliers can do to mitigate these risks.

SUPPLY CHAIN COLLABORATION: MIGRANT LABOUR

Bakkavor has been working with its poultry suppliers in Thailand so that they understand their foreign worker labour supply chain and the costs involved. This involves mapping and understanding the nationality of the workers, the role of in country employment agencies (both source country and Thailand), the charges workers have to pay (if any) to access the Thai jobs market and how the charges differ by origin country and importantly the costs paid by the companies and those paid by the workers.

While Covid-19 delayed roll out, the suppliers have been tasked with creating a formal timebound action plan which aligns each supplier's recruitment process with the employer pays principle, reflecting the International Labour Organisation's (ILO) definition of recruitment fees and costs which should be paid by the employer and those costs which it is reasonable to expect a worker to pay all of which is detailed within a migrant worker policy.

SUPPLY CHAIN COLLABORATION: SPANISH ETHICAL TRADE FORUMS

The Spanish Ethical Trade Forums (ETF) were established to create a non-competitive space where Spanish growers supplying the UK retail market can discuss joint challenges and share best practice on human rights and environmental issues. The main aims of the forums are to drive continuous improvement in the working conditions for people working within the Spanish agricultural industry, and to provide support to our and other suppliers as they seek, through continuous improvement, to deliver the expectations of the ETI Base Code.

During 2021 the ETF membership continued to face the challenges that had emerged throughout 2020. Due to the impact of Covid-19 the preferred format of in-person regionally focused meetings was not possible and as a result the forums remained online, with membership meetings and working groups continuing with this approach. Over the year 751 attendees participated in online events covering topics as diverse as 'Worker Participation as a Driver for Change'; 'The Importance of Due Diligence in Social Auditing and Management of Labour Migration'; and 'Technology Applied to People and Workplaces'.

The ETF secretariat and membership continued to support the ETF working groups during 2021, including a newly launched Sustainability Working Group. Key outputs have been

- Guidance and checklist on Responsible Use of Agencies

- Guidance and checklist on Applying ETF Principles
- Anti-harassment protocol & equality plan Guidelines
- Guidance and pilot plan on Worker and Management Dialogue
- Guidance on Grievance Mechanisms
- Carbon Footprint Guide
- Quarterly Member Bulletins

Bakkavor representatives based in Spain are actively involved in various ETF working groups, including representing the manufacturing sector on the ETF Governance Group that provides strategic direction and oversight to the organisation.

SUPPLY CHAIN COLLABORATION: MODERN SLAVERY INTELLIGENCE NETWORK

Bakkavor are founding supporters of the Modern Slavery Intelligence Network (MSIN), a non-profit collaboration between supermarkets and large food and fresh produce processors created in response to the findings of Operation Fort, the UK's largest ever Modern Slavery investigation.

Formed in the second half of 2020, this group continued to develop and trial a structured intelligence-sharing mechanism between its members which will enhance the effectiveness of their contribution to the disruption of modern slavery and labour exploitation practices. The aim is to use the information generated by this network to detect, prevent and disrupt modern slavery and labour exploitation activity, protecting workers and improving outcomes for victims.

We and the other members of MSIN are co-funding the development of the pilot in conjunction with the Institute of Grocery Distribution, and colleagues from our Responsible Sourcing team have actively contributed to the project throughout 2021 and expect the intelligence sharing mechanism to be finalised and rolled out during 2022.

SUPPLY CHAIN COLLABORATION: CHINA

Through the Bakkavor Direct Sourcing team in Asia, we work directly with key suppliers to develop a robust, transparent supply chain.

An essential part of the way we operate is to develop good business relationships with these suppliers, reinforced by regular site visits from our local team. During these visits we will randomly select factory workers to talk to, first hand, in their own language, to understand whether they have any concerns with regard to their employment. We also monitor that none of our direct suppliers employ Uyghurs, or source any raw materials from Xinjiang Province of China. These visits from our team are in addition to the official audits carried out by the local and national authorities, which include customs.

As a result of Covid, a few suppliers were forced to close their operation for a limited period of time, either due to local lockdown or when some Covid cases were found in their factories. When this happened, the suppliers continued to pay their workers

based on the terms of their working contracts and based on the local laws, which allowed them to secure their workforce and have the labour ready as soon as they opened.

A concern when sourcing from Asian countries is the use of migrant and/or ethnic minority labour, without the correct controls being in place. The suppliers that Bakkavor work with are often located in rural locations, close to the crops being processed, and use local labour. In Thailand where migrant labour is used, this is monitored to ensure that the workers have the necessary work registrations and contracts.

There are several ethical audit standards used in Asia, Bakkavor supports its suppliers in their adoption of the ETI Base Code / BSCI (Business Social Compliance Initiative) with a target of 85% of our volume to be sourced through SMETA (Sedex Members Ethical Trade Audit) audited manufacturing sites by the end of 2022. Despite COVID-19 lockdowns, physical audits and visits have been maintained when necessary. If some of our own team were under temporary local travel restrictions, we used a 3rd party to do the necessary audits. Third party certifications such as BRC have always been renewed on time

MODERN SLAVERY TRAINING AND AWARENESS

Bakkavor own operations capability building – we continued to deliver our on-line modular training programme in 2021. The training plan was reviewed and extended to include other functions. The following sessions took place:

- Modern Slavery and Hidden Exploitation for SEF and Trade Union (TU) Representatives x 4
- Modern Slavery and Hidden Exploitation for HR x 2
- Modern Slavery and Hidden Exploitation for Operations x 4
- Introduction to Ethical Trade and Human Rights for HR x 1
- Bakkavor Ethical Trade and Human Rights Programme for HR x 1
- Annual Modern Slavery Risk Assessment for HR x 2
- Customer & Human Rights for HR, Commercial, Procurement and Technical x 2

The on-line modular training works extremely well and enables us to reach more colleagues across the group. We will continue to deliver this training online and include more functions in the future. It is important our HR colleagues have the knowledge and expertise to be able to lead our ethical and human rights activities within our own operations, as well as other functions having an awareness of the issues of modern slavery and hidden exploitation.

Bakkavor continues to be an active supporter of Stronger Together training, ensuring that many operational managers, as well as at least one member of the HR team at every site has attended training. Stronger Together materials are displayed at all sites to provide details on what employees should look out for and how they can raise any concerns.

Our Group Ethical Compliance Consultant accesses the Stronger Together resources to ensure we have the most up to date information on tackling the issue of modern slavery and hidden exploitation which were built into our training sessions for 2021.

EFFECTIVENESS ASSESSMENT

To assess the impact of the steps we have taken, key performance indicators are reviewed and reported on in our Modern Slavery Statements:

Key Performance Indicator	2017	2018	2019	2020	2021
Stronger Together Progress Monitoring Tool		48.6%	55%	65%	77%
Stronger Together Organisational Performance Assessment		43%			77%
% of Bakkavor sites with HR that have completed the Stronger Together training	89%	100%	100%	89%	100%
% of Bakkavor sites completed the Modern Slavery Risk Assessment with an action plan	100%	100%	100%	100%	100%
% of Bakkavor sites completed the Stronger Together Tackling Modern Slavery in Business Implementation Checklist		100%	100%	100%	100%
Number of Bakkavor Group Capacity Building Days	550	469	521	225	2205 ¹
% of Bakkavor sites that have completed an agency audit every 6 months	100%	100%	100%	100%	100%
Number of cases received by the Whistleblowing hotline	105	67	69	51	42
% of 2021 Whistleblowing cases closed out	100%	100%	100%	100%	100%
Modern Slavery Risk Rating (New in 2021)					65% ²

These KPIs support the focus on building capacity and awareness across the Group.

¹ This includes capacity building for internal colleagues and down our supply chain.

² New risk assessment process for 2021.



Stronger Together Tackling Modern Slavery Good Practice Implementation Checklist Progress:

In 2020, we started using the updated checklist and we are now able to monitor our year-on-year progress.

The checklist has enabled us to measure our activities against the UN Guiding Principles Framework:

Steps	2020	2021
1. COMMIT to tackle modern slavery risk in your business	65%	85%
2. ASSESS - Understand the risks of modern slavery and hidden exploitation within your business	75%	82%
3. ACT - Take action to prevent and deal with identified risks	49%	52%
4. REMEDY - Protect and provide remedy for victims of exploitation	34%	64%
5. MONITOR - Monitor and review progress	66%	81%
6. COMMUNICATE - Tell people what you've done	71%	88%
OVERALL SCORE	54%	65%

We were pleased to see our overall score has increased from 54% to 65% and we have action plans in place to drive further improvements in our scores in 2022.

Stronger Together Progress Monitoring Tool Benchmark Results:

Bakkavor’s overall results have increased from 65% to 77%. Compared to other businesses, we are ahead in every category. ‘Remedy’ and ‘Monitor’ have both improved and are rated as ‘getting there’. Remedy is included in our 2022 action plan.



Summary Report - Bakkavor

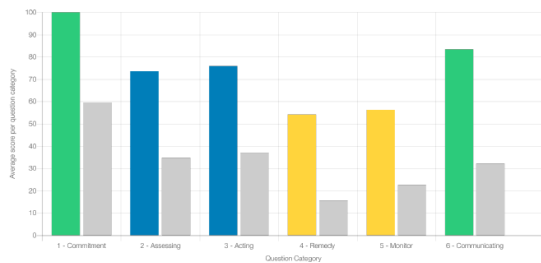
Completed Questionnaires

Date Completed	Score
22 Dec, 21	77%
12 Oct, 21	73%
20 Nov, 20	65%
16 Jan, 20	55%
07 Oct, 19	56%

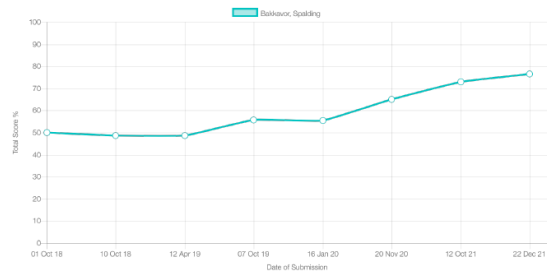
Graph Legend

1. Commitment to Tackle Modern Slavery Risks
 2. Assessing Risks of Modern Slavery
 3. Acting to Reduce Risks of Modern Slavery
 4. Ensuring Appropriate Remedy for Victims of Modern Slavery
 5. Monitor Progress in Addressing and Reducing the Risk of Modern Slavery
 6. Communicating Progress in Addressing and Reducing the Risks of Modern Slavery
- Priority area (< 20)
 ■ More work needed (20 - 40)
 ■ Getting there (40 - 60)
 ■ Good progress (60 - 80)
 ■ Achieving (> 80)
 ■ Others in the programme

Results - Overview




Results - Progress



Stronger Together Organisational Performance Assessment

In 2021, Stronger Together carried out an independent assessment of our progressing tackling risks of modern slavery.





Organisational Performance Assessment

Summary report of progress in addressing the risks of modern slavery

Organisational Progress Score in addressing modern slavery risks:	77%
Addressing modern slavery risks in own business: Progress Score	86%
Addressing modern slavery risks in supply chains: Progress Score	74%

Organisation Name Bakkavor

Manager Gillian Haythornthwaite
Group Ethical & Compliance

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Commit	100%
Assess	73%
Act	77%
Remedy	54%
Monitor	56%
Communicate	83%

Steps to address modern slavery risks	Progress Score
1 Committing to tackle modern slavery	
1.1 Has the business made a clear commitment to tackle modern slavery risk?	100%
2 Assessing the risk of modern slavery	
2.1 Has the company taken appropriate steps to assess the risk of modern slavery in its business and supply chain?	73%
3 Acting to reduce the risk of modern slavery	
3.1 Has the company implemented training and capacity building to reduce the risk of modern slavery?	54%
3.2 Has the company implemented internal operational steps to reduce the risk of modern slavery?	75%
3.3 Does the company engage with suppliers and work collaboratively to reduce the risk of modern slavery?	69%
3.4 Does the company have effective worker voice mechanisms to reduce the risk of modern slavery?	81%
3.5 Has the company reviewed its procurement practices to reduce the risk of modern slavery?	83%
3.6 Has the company reviewed its recruitment practices to reduce the risk of modern slavery?	65%
4 Providing appropriate remedy for victims	
4.1 Has the company taken effective steps to ensure appropriate remedy for victims of modern slavery?	54%
5 Monitoring progress in addressing and reducing the risk of modern slavery	
5.1 Has the company taken effective steps to monitor its progress in addressing and reducing the risk of modern slavery?	56%
6 Communicate progress in addressing and reducing the risk of modern slavery	
6.1 Has the company taken effective steps to communicate its progress in addressing and reducing the risk of modern slavery?	83%

Produced on 16/12/2021

The Group was very pleased that the assessment recognised the significant progress since 2018.

This statement was approved by the Board of Bakkavor Group plc on 29 June 2022.