



## **Modern Slavery and Human Trafficking Statement for the financial year ending 25 June 2023**

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes anti-slavery and human trafficking statement for the financial year ending 30 June 2022 for Bright Blue Foods Limited and any subsidiary and/or holding company of Bright Blue Foods Limited as defined in section 1159 of the Companies Act 2006 (**Group Company**). Any reference to “BBF”, “BBF’s”, “the Company”, “Company”, “we”, “us” or “our” is a reference to Bright Blue Foods Limited and/or a Group Company. The statement sets out the steps taken, and those which BBF intends to take in the future to prevent modern slavery and human trafficking in our supply chains or in any part of our business.

### **About BBF**

BBF is one of the UK’s leading ambient cake and chilled dessert manufacturers of retailer own label, licensed and branded cakes, supplying recognisable retailers across the UK and European market. BBF has five bakeries based in the UK and Poland, employing over 1500 people.

### **Our Commitment**

BBF is steadfast in its commitment to preventing modern slavery and human trafficking within its corporate activities and collaborates with its supply chains to eradicate such practices. This statement outlines the measures taken by BBF to understand potential modern slavery risks associated with its business and outlines steps to ensure the absence of slavery or human trafficking within its operations and supply chains.

### **Responsibility and Governance**

BBF’s directors oversee effective modern slavery risk assessments, implement due diligence processes, and facilitate comprehensive induction/refresher training across the organization. The Modern Slavery and Human Trafficking Policy provides detailed insights into these efforts.

### **Supply Chain Integrity**

Given BBF's sourcing of over 500 ingredients globally, we emphasise Environmental and Ethical Sourcing as a pivotal aspect of our approach, and we strive to source all our ingredients, goods and services in an ethical and responsible way. First-tier suppliers are mandated to be members of Sedex (the Supplier Ethical Trading Data Exchange), reinforcing ethical trade practices. Beyond the first tier, our extensive and multi-layered supply chain is subject to ongoing evaluation and collaboration with first-tier suppliers to manage modern slavery risks.

### **Employee Management**

BBF recognises the high-risk nature of seasonal, temporary workers in its bakeries and has established a well-established and robust audit process. This process aligns with guidance from Stronger Together and the Gangmasters and Labour Abuse Authority, ensuring continual review and enhancement.

### **Training Initiatives**

To effectively prevent and address modern slavery and human trafficking, BBF focuses on raising awareness through compulsory training. Induction includes a modern slavery section, and mandatory training is part of our comprehensive training package. All Senior Managers, Human Resources employees and procurement team members undergo workshops with Stronger Together on tackling modern slavery in the UK.



HR teams at BBF are provided with extensive knowledge and resources required to conduct in depth checks on 'Right to Work' compliance. HR managers also maintain the management of the SEDEX system.

### **Policies and Procedures**

BBF upholds the objectives of the Modern Slavery Act by maintaining robust policies and procedures. The Whistleblowing Policy encourages the reporting of concerns without fear of reprisal, further supported by a confidential whistleblowing helpline through Navex Global, which is designed to allow employees to confidentially raise any concerns (of unethical conduct or behaviour), 24 hours a day, 365 days a year via telephone, or via an online portal. Any complaints or reports will be investigated.

BBF have a structured HR function and an array of policies, procedures and systems that are devised to ensure we are conducting our business in an ethical, responsible and transparent manner. All new employees and agency workers are required to prove that they have a right to work in the UK, to safeguard against human trafficking or individuals being forced to work against their will. All employees are paid directly into their elected bank account.

### **Compliance and Review**

BBF is satisfied that its existing policies comply with legal requirements, including those related to modern slavery and human trafficking. This statement, approved by BBF's Board of Directors, undergoes an annual review to ensure continued relevance and effectiveness.

Jonathan Lill  
CEO  
01 December 2023