



MODERN SLAVERY STATEMENT – 2021

Introduction

This is the Modern Slavery Statement of Froneri Limited and its subsidiaries, Froneri International Limited and R&R Ice Cream UK Limited (together “Froneri”).

Froneri Limited is the ultimate UK parent of the Froneri group and Froneri International Limited is the parent of the operational group, providing central support and services to its operational companies worldwide. R&R Ice Cream UK Limited is Froneri’s main operating business in the UK.

Froneri is a global manufacturer of ice cream, frozen food and chilled dairy products and has its head office in the UK.

This Modern Slavery Statement details Froneri’s actions and activities during the financial year 1st January to 31st December 2021 to prevent modern slavery taking place in our business and supply chains.

Organisational Structure and Supply Chains

Froneri group operates 31 factories in 23 countries across the world, employing over 13,000 people with sites in Europe, Australia, New Zealand, the Middle East, Argentina, Brazil, the Philippines, South Africa, Puerto Rico and the United States. Froneri operates a decentralised model with international subsidiaries operating as standalone businesses and relying on Froneri International Limited for central business support and group policies. Froneri group operates in the UK through its operating business R&R Ice Cream UK Limited across 3 manufacturing sites.

The nature of the supply chain principally relates to the provision of food ingredients and packaging as well as the labour used in the manufacturing process.

As a food manufacturer we have suppliers located throughout the world. We are aware that, like other companies in the sector who draw on similar supplies, we are exposed to a level of modern slavery risk through our UK and global supply chains. We are therefore committed to the prevention of modern slavery and human trafficking both in our business and in our supply chains and have a zero-tolerance approach to modern slavery.

Froneri has a group Supplier Code which sets out Froneri’s expectations of suppliers in respect of modern slavery. All suppliers are required to communicate the content of the Supplier Code to any subcontractors and their employees. All Froneri suppliers of raw materials and packaging are required to complete a Supplier Questionnaire at point of onboarding which requires confirmation of compliance with minimum standards of environmental and social responsibility based on international standards and guidelines. By completing the Supplier Questionnaire suppliers agree to comply with the Froneri Supplier Code.



Froneri reserves the right to carry out audits of supplier's premises in order to verify compliance with the Supplier Code or with the minimum standards agreed to in the Supplier Questionnaire. The audits were on hold during 2020 due to COVID 19, however recommenced in 2021 as further detailed below.

The Supplier Code requires all new and existing suppliers to join Supplier Ethical Data Exchange (SEDEX) (or equivalent platform preferred by the supplier) and complete a Self-Assessment Questionnaire (SAQ) on labour management, employment, health & safety and environment within their business. With the support from SEDEX and other platform providers used by our suppliers, we increase our visibility of our supply chain.

Policies in relation to modern slavery and human trafficking

Froneri manages modern slavery risks and has taken steps to prevent modern slavery occurring in our business and our supply chain with the following policies and practices:

- **Modern Slavery Policy:** In 2021 a Froneri Group Modern Slavery Policy was implemented. This policy outlines our expectations in respect of modern slavery and strengthens our approach to due diligence. The policy requires Froneri International Limited's international subsidiaries to adopt this policy and supplement it with applicable local controls based on local laws. The Policy and supporting documentation was prepared with the assistance of specialist external lawyers and approved by the Froneri Group Board.
- **Labour Practices:** we consistently adopt and implement labour practices that meet or exceed recognised international standards and, through promotion, monitoring, training and audit verification, seek to maintain these standards across the group.
- **Whistleblowing** and reporting hotline available to all Froneri colleagues worldwide, which is free, anonymous, and confidential to allow employees to raise matters of concern. The contact details are communicated to colleagues by each business (e.g. displayed on notice boards at all UK sites and embedded within the induction programmes). All new starters are encouraged to report any concerns including risks of slavery and human trafficking. The whistleblowing procedure is designed to make it easy for workers to make full disclosures without fear. The whistle blowing procedure allows for issues of concern to be escalated to country leadership or group level so that they can be dealt with properly.
- **Group Employee Code of Conduct** confirms that employees understand what is required from them in terms of setting the standards on how we work together. It covers a range of issues relating to professional behaviour as an employee and how to conduct business ethically. A refreshed and updated Code of Conduct was implemented in 2021 and applies to all employees worldwide.
- Commitment to **responsible sourcing** by adopting the Ethical Trading Initiative base code of labour practices.
- **Staff engagement surveys** provide opportunities for employees to raise concerns on any matter including slavery or forced labour.
- **Annual Ethical Trading Audits** take place within our own UK factories, conducted by an independent third-party Bureau Veritas. The results are loaded to SEDEX and / or SMETA (an alternative social audit platform) and are visible to all our customers. During 2021 ethical



trading audits were completed at 2 out of our 3 UK sites, 1 site in Finland, 1 site in Germany, 1 site in Australia and 1 site in France.

Froneri International Limited's international subsidiaries apply group policies and procedures and supplement these with local controls based on local laws.

Due diligence and processes

Froneri undertakes risk based due diligence on new and existing suppliers in order to limit the risk of modern slavery risk in our supply chain and has in place systems to encourage the reporting of concerns by suppliers and the protection of whistle blowers.

Our Supplier Code includes a requirement to join online platform SEDEX (or another approved platform), to manage and improve working conditions in global supply chains.

We encourage suppliers to undertake their own ethical trading audits and conduct regular reviews of existing suppliers, including Self-Assessment Questionnaires (SAQ) and ethical trading audits.

Risk assessment and management

As part of our commitment to combatting modern slavery in the UK, last year we started a Supplier Engagement Project conducted by SEDEX which the UK business use to provide a platform for UK suppliers to provide information about health and safety, working conditions, environment, and business ethics.

This Supplier Engagement Project continued in 2021 with the aim to encourage and support suppliers with renewing their SEDEX membership, to support the objective to have SAQs completed by at least 95% of suppliers and to support suppliers in linking to Froneri on the platform so that the supplier SAQ information is visible to Froneri. Our suppliers were allocated to agents within the SEDEX engagement team, depending on geographical location and language requirements.

We regularly review audit information from the SEDEX platform and will continue to risk assess our suppliers via supplier audits in 2022 and via SEDEX engagement projects.

Measuring effectiveness

We regularly review our performance against the measures we have in place. In respect of our UK business this is managed via our annual third-party Ethical Trading Audits which identify any non-conformances and provide a corrective action plan to ensure we are maintaining the highest standard of ethical trading at all times. Froneri's other international subsidiaries are encouraged to undertake their own ethical trading audits.

Training on modern slavery and trafficking

We take our responsibility to be alert to the risks of modern slavery very seriously and actively raise awareness of the risks of modern slavery with all our colleagues.



Everyone in our business undergoes induction training. Included in this induction training is a section on Code of Conduct (and more specifically in the UK on modern slavery). It provides a clear message to work together to tackle hidden labour exploitation and how to report any concerns. It enables our employees to understand and spot the signs of modern slavery and human trafficking.

In 2021, Froneri established a group e-learning platform with training being rolled out to colleagues globally on various compliance topics. A focused modern slavery e-learning module has been prepared with the assistance of external lawyers and is on track for roll out to colleagues across the group in 2022. A Code of Conduct module, which included general awareness on modern slavery, was rolled out to all office-based colleagues in 2021 and an awareness video was recorded and provided to those colleagues outside of office-based roles.

In addition, the UK business commitment to training has continued during 2021 in the following areas:

- Attendance at Stronger Together, Tackling Modern Day Slavery, external training attended by our UK Buyer, Factory Managers and key teams at all of our UK factories.
- Attendance at Association of Labour Providers, responsible tool kit training for fair & equal opportunity and treatment attended by all UK staff involved with on-boarding new employees at all UK sites.
- Human Rights due diligence training was attended by the UK Training Manager.

Next Year

The plan for 2022 is to continue to develop our approach to combatting modern slavery and human trafficking and we will continue to assess and manage risks on an on-going basis.

In 2022, we will continue to enforce the Froneri Group Modern Slavery Policy, ensuring each Froneri International Limited subsidiary has a fully implemented local Modern Slavery Policy in line with group minimum standards and local laws. This will be monitored by Group Internal Audit, with Group Legal supporting the local teams where required.

Focussed modern slavery training will be rolled out to all relevant staff via the global e-learning platform in 2022 with the aim for 100% completion by 31 December 2022.

Supplier audits and audits of our own factories will continue in 2022.

We will continue to review our existing supply chains and work to on-board remaining suppliers on to the SEDEX (or alternative approved) platform.

In the UK, the continued aim is to have 95% of suppliers on-boarded to SEDEX which we hope to complete by 31 December 2022 and to progress supplier SAQ's with a >95% questionnaire response rate. We will check supplier ethical, environmental, and social practices contained within each SAQ and from audit findings and risk assess based on the responses given. We aim to ensure that >50% of our suppliers have had an ethical trading audit.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2021.

Ibrahim Najafi
Chief Executive Officer

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