



## Modern Slavery Statement May 2019

### **Introduction**

Brakes is fully committed to ethical working practices, and, as a company, regards inhumane conditions such as slavery, worker exploitation, and human trafficking as completely unacceptable either within our own business or through our supply chains.

Given our global reach, we understand our responsibilities and have a zero-tolerance approach to modern slavery. We recognise that modern slavery, which can take many forms, is a crime, and we strive to act ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

Brakes has, for a number of years, had in place ethical trading standards to which each of our suppliers is required to adhere, as well as a set of Values which require us, among other things, to be the best we can be, and to always do the right thing. Our commitment to anti-slavery and human trafficking is further strengthened with the introduction of our Modern Slavery Policy which applies to all employees, officers, workers, contractors, suppliers and other business partners.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our Board fully supports the aims of the Act and is committed to combating the risk of slavery and human trafficking in our business.

### **Organisation and Business Structure**

Brakes is a leading specialist supplier of frozen, chilled and ambient food products, as well as catering supplies and equipment, to the foodservice industry. The principal trading companies in the group are Brake Bros Limited, Pauleys Produce Limited, M&J Seafood Limited, Wild Harvest Limited, Brakes Foodservice NI Limited, Freshfayre Limited, Fresh Direct (UK) Limited, Brake Bros Foodservice Ireland Limited, Brake France Service SAS, Davigel SAS and Menigo Foodservice AB.

In 2016 the Group was acquired by Sysco Corporation, the global leader in foodservice. As a Group, we employ around 10,000 employees across the UK, the Republic of Ireland, France, Sweden, Spain and Belgium.

In the UK, which employs around 7,000 employees, our business is organised into various business units as follows:

- Brakes UK;
- Brakes Ireland;
- Fresh Direct;
- Country Choice;
- Freshfayre;
- Wild Harvest;
- M&J Seafood;
- Pauleys;
- Woodward's; and
- Brakes Catering Equipment.

### **Our Supply Chains**

Whilst many of the products sold by Brakes are sourced from the UK, we also source globally to support the range, quality, provenance, availability, and price requirements of our customers.

### **Prevention of slavery and human trafficking in Brakes**

#### **Right to Work Checks**

All colleagues employed by Brakes who work on a temporary, fixed term or permanent basis are subject to a right to work check in accordance with UK legislation. A person is unable to commence work for Brakes unless they satisfy us that they are legally able to work within the UK.

#### **Resourcing**

Where Brakes employs the services of an employment agency to source candidates for permanent or fixed term positions, we endeavour to only use agencies of good repute and who are listed on our preferred supplier list. Brakes requires the agencies to undertake the appropriate background checks on prospective colleagues, in conjunction with our own checks.

#### **Agency Workers**

Where Brakes uses temporary workers supplied through an employment agency, we expect and require the agency to undertake the appropriate checks. We operate a preferred supplier list for these agencies and those listed are expected to undertake the appropriate background checks on prospective colleagues and to comply with our Ethical Trading Code of Conduct, which incorporates compliance with the Modern Slavery Act and other critical legislation.

If Brakes identifies that an employment agency is not adhering to our standards, the agency will be removed from the preferred supplier list and will not be engaged in any further recruitment activity on any basis.

### **Whistleblowing policy**

We have a whistle blowing policy in place which applies to all employees, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers or any other person associated with Brakes. Any colleague who has concerns about any aspect of the Brakes business is able to disclose their concerns in accordance with the whistle blowing policy. It is anticipated that the policy will be replaced during the course of 2019 with a "Sysco Code of Conduct". Training on the new Code of Conduct and the standards expected will be provided to all colleagues and, at the same time, an Ethics Line will be launched through which our colleagues and third parties will be encouraged to report any concerns. Any concerns reported will be investigated thoroughly.

### **Prevention of slavery and human trafficking in Brakes' supply chains**

Brakes has an ethical trading policy which is detailed in its 'Working with Us' document, and to which all suppliers of Brakes products must adhere. It is based on the standards set by the Ethical Trade Initiative (ETI) and reflects the key elements of the International Labour Organisation (ILO) conventions. Brakes ethical trading policy is regularly reviewed and a recent update to the policy now requires Brakes own brand suppliers to join Sedex, being one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains. The Sedex platform assists Brakes and its suppliers with managing and improving performance when it comes to labour rights, health and safety, the environment and business ethics and we are currently working with our existing own brand suppliers to enhance transparency in these important areas.

### **Supplier adherence to our values**

To ensure all those in our supply chain comply with our values we have in place a supply chain compliance programme.

Our risk framework, against which all new suppliers will be assessed and existing suppliers measured for compliance, determines the level of ethical risk at each stage of the supply chain. Effective escalation processes are in place to support decision making, should we become aware of non-compliance. Suppliers are required to undertake an independent ethical audit of their full supply chain should it be deemed necessary by risk assessment. The outcome of such an audit is used to determine whether Brakes will work with the supplier. Brakes would address any failure by a supplier to meet Brakes' standards on a case by case basis, however, suppliers who fail to meet Brakes' standards may jeopardise their ability to continue to do business with Brakes.

Supplier's ethical performance will be monitored on an ongoing basis using the Sedex risk assessment tool. Our own brand suppliers will be required to review and update the Sedex Self-Assessment Questionnaire (SAQ) on an annual basis and to maintain ethical audits at the frequency determined by the level of risk and vulnerability within their supply chain.

We will continue to review the effectiveness of these controls in reducing the risk of unethical practices.

Our Procurement, Technical, HR and Legal teams have the primary responsibility for ensuring supplier and contractor adherence to our values.

### **Due Diligence Processes**

As part of our ongoing strategy to identify and mitigate risk we have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### **Training**

Brakes' policies and standards are readily available to colleagues through the intranet and notice boards. To ensure a high level of understanding of the new legislation and the risks of modern slavery and human trafficking in our supply chains and our business, we will provide further training to our colleagues.

### **Reporting on our Progress**

With the introduction of the Modern Slavery Act 2015, we took the opportunity to review and update our our Terms and Conditions of Purchase; Working with Us Document; and Ethical Trading Code of Conduct. We wrote to all of our suppliers to communicate the changes and to reiterate our commitment to a policy of delivering products that are sourced in an ethical and responsible manner and to ensure our suppliers were aware of our joint responsibilities and our requirement for them to adhere to the practices and controls we put in place to ensure the welfare of those employed within their supply chains. We have also reminded our suppliers that we require their cooperation with any inspections and / or investigations conducted by Brakes from time to time to allow us to verify compliance with our policies.

In the past twelve months, we have made progress in mapping our own business and key suppliers to identify those at a higher risk from Modern Slavery and we have developed a risk assessment by region and sector. Having completed this review, we are now looking to implement enhancements to our monitoring.

Brakes continues to train all managers in conducting right to work checks in respect of new starters and we have improved our processes such that no new employee can be set-up on payroll without having first passed a right to work check. Further guidance is provided to managers in a document known as the 'manager's toolkit' and is accompanied by a short video to support their learning and understanding.

Brakes has formed a working committee which comprises colleagues from our Procurement, Technical, Human Resources and Legal teams to review our Modern Slavery Statement and related policies and to consider what further improvements can be implemented by the business.

During the last 12 months we can confirm that there have been no reports of slavery or human trafficking within the Brakes supply chain.

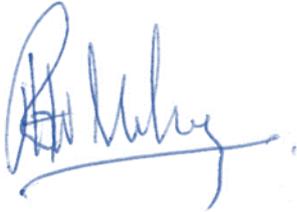
### Further Steps

We recognise that more can always be done to tackle Modern Slavery and, as a business, we are committed to helping to increase awareness of the issues and a process of ongoing review of our practices and policies to combat the risk of slavery and human trafficking. We intend to take the following further steps to continue to combat slavery and human trafficking, going forwards:

- We are continuing to build on the ethical trading training previously provided to our supplier facing Procurement and Technical teams and we will roll out a programme of Modern slavery training to raise awareness of the issues. We have engaged with the Ethical Trading Initiative (ETI) to develop comprehensive training for managers within our Procurement and Technical teams. ETI training focuses not only on developing an understanding of core ethical issues but also on the practical steps businesses can take to tackle the root causes of modern slavery issues in their supply chains. It is our intention to commence the roll-out of this training in April 2019.
- Having undertaken a review of the effectiveness of our supply chain controls in reducing the risk of unethical practices we are enhancing the transparency in our supply chain by using best in class tools such as Sedex. We are working with independent experts to help validate our plans and provide additional support.
- We have amended our Ethical Trading Policy to include a requirement for all new and existing Brakes' brand suppliers to join Sedex, which allows those suppliers to manage and share their data on responsible sourcing within their supply chain with Brakes. This will allow us to manage and improve performance when it

comes to labour rights, health and safety, the environment and business ethics. We are in the final stages of completing the Sedex roll out with our Brake brand suppliers and we expect to complete the process during the first half of 2019.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

A handwritten signature in blue ink, appearing to read 'Hugo Mahoney', with a long horizontal stroke extending to the right.

**Hugo Mahoney**  
**Chief Executive Officer**