



## Modern Slavery Statement

### Introduction

This statement is issued by Sysco GB Limited, whose trading divisions are Brakes, Fresh Direct, Kff and Medina Foodservice and whose trading brands include Country Choice, Brakes Catering Equipment, M&J Fresh Seafood and Wild Harvest ("Sysco").

Sysco is a leading specialist in selling, marketing and distributing food and related products to customers who prepare meals away from home. This includes restaurants, healthcare and educational facilities, lodging establishments, entertainment venues, and more. Sysco employs over 8,500 colleagues across Great Britain. Sysco's US parent company is Sysco Corporation, the global leader in foodservice.

Sysco is fully committed to ethical working practices, and regards inhumane conditions such as slavery, worker exploitation, and human trafficking as completely unacceptable either within its own business or in its supply chains.

Sysco has a zero-tolerance approach to modern slavery. Sysco recognises that modern slavery is a crime which can take many forms. Sysco strives to act ethically and with integrity in all of its business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place in its own business or in its supply chains.

Suppliers to Sysco are required to adhere to the Sysco Supplier Code of Conduct (<https://sysco.com/Suppliers/Supplier-Partnerships/Supplier-Resources.html>) which sets out Sysco's organisational values in relation to human rights. All Sysco colleagues are required to adhere to the Sysco Global Code of Conduct, which sets out Sysco's commitment to the principles of the UN Global Compact and the Universal Declaration of Human Rights, and all Sysco colleagues are required to complete mandatory Code of Conduct training on an annual basis.

Sysco is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout Sysco supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. The senior leadership team of Sysco fully supports the aims of the Act and is committed to combatting the risk of slavery and human trafficking in its business.

Nominated risk leads in Sysco's Merchandising, Technical, Sustainability, HR and Legal teams have the primary responsibility for monitoring modern slavery risks in Sysco's organisation and supply chain. These functional leads sit on the Sysco Risk Committee, which meets quarterly and reports into the Sysco senior

leadership team. As part of Sysco's ongoing strategy to identify and mitigate the risk of modern slavery, Sysco has systems in place to:

- Identify and assess potential risk areas in Sysco's workforce and supply chain;
- Monitor potential risk areas and mitigate the risk of slavery and human trafficking occurring;
- Encourage and enable reporting and speaking up, and protect whistle blowers;
- Investigate all concerns promptly and thoroughly, and take appropriate action.

### [Prevention of slavery and human trafficking in the Sysco workforce](#)

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

All colleagues employed by Sysco 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 Sysco unless they first satisfy Sysco that they are legally able to work within the UK.

#### **Resourcing**

Where Sysco employs the services of an employment agency to source candidates for permanent or fixed term positions, such agencies are of good repute and are vetted prior to inclusion on Sysco's preferred supplier list. Sysco requires agencies to undertake appropriate background checks and due diligence on prospective colleagues, in conjunction with Sysco's own checks.

#### **Agency Workers**

Where Sysco uses temporary workers supplied through an employment agency, the agency is required to undertake appropriate background checks on the agency worker. Sysco operates a preferred supplier list for these agencies and those listed are required to comply with the Sysco Supplier Code of Conduct, which incorporates compliance with the Modern Slavery Act and other critical legislation.

If Sysco identifies that an employment agency is not adhering to Sysco's standards, the agency is removed from the preferred supplier list and is not engaged by Sysco in any further recruitment activity.

#### **Whistleblowing policy**

Sysco has a whistleblowing policy in place under Sysco's Global Code of Conduct, which applies to all colleagues, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers or any other person associated with Sysco. Any colleague who has concerns about any aspect of Sysco or its supply chain is encouraged to disclose their concerns, either through one of the regular reporting channels (to their line manager, to HR, to the UK Legal Team or the Global Ethics and Compliance Team) or anonymously through the Sysco Ethics Line (either telephone or online). Any concerns are investigated thoroughly and retaliation is strictly prohibited.

### [Prevention of slavery and human trafficking in Sysco's supply chain](#)

#### **Sysco's Supply Chain**

Whilst many of the products sold by Sysco are sourced from the UK, Sysco also sources globally to support the range, quality, provenance, availability, and price requirements of Sysco's customers.

### **Supplier adherence to Sysco's values**

In order to work with a trading division of Sysco GB, all suppliers must sign up to Sysco's Terms and Conditions of Purchase and that division's operational requirements document. These contractual documents require compliance with the Modern Slavery Act 2015 and are regularly reviewed to ensure that they support Sysco in its aim to prevent slavery and human trafficking in Sysco's supply chain. They are underpinned by the Sysco Supplier Code of Conduct, which all suppliers are required to adhere to.

Sysco's own brand suppliers are required to join Sedex, one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains. The Sedex platform assists Sysco and its suppliers with monitoring performance in terms of labour rights, health and safety, the environment and business ethics. Sysco's own brand suppliers are required to complete an annual Sedex Self-Assessment Questionnaire (SAQ) and to maintain ethical audits at the frequency determined by the identified level of risk and vulnerability within their supply chain.

Where a supplier is not a Sedex member, this is an important consideration when assessing their suitability as a supply partner to Sysco. In such circumstances, Sysco will carefully consider the supplier's own corporate social responsibility credentials and related policies, before deciding to work with such a supplier.

Sysco addresses any failure by a supplier to meet Sysco's standards on a case-by-case basis and is committed to working with suppliers to improve in identified risk areas. Suppliers who fail to meet Sysco's standard and/or fail to demonstrate an active commitment to improving ethical standards in their supply chain will jeopardise their ability to continue to work with Sysco.

### **Training**

All Sysco policies and standards are readily available to colleagues through the "People Hub" internal HR platform and changes/updates are also notified on physical notice boards. All Sysco colleagues must complete mandatory annual training on the Sysco Global Code of Conduct, which prohibits child labour, forced labour, and human trafficking in Sysco's global supply chain. Sysco tracks completion of the training by individual colleagues. Sysco provides an online training module on Modern Slavery to colleagues on Sysco's "Workday" platform, which provides an overview of the legislation and the risks of modern slavery and human trafficking in Sysco's supply chains and business.

### **Reporting on Sysco's Progress**

In the last 12 months:

- All new Sysco colleagues joining in 2025 completed mandatory online training on the Sysco Global Code of Conduct as part of their induction programme, which prohibits child labour, forced labour, and human trafficking in Sysco's global supply chain.
- The Sysco Risk Committee was formed and consists of GB leaders across all functions, including Legal, Sustainability, Procurement, HR and Technical/QA. The Committee meet on a quarterly basis to discuss cross-functional risks which appear on individual risk registers; modern slavery and human rights is a key topic that sits cross-functionally across risk registers. The Committee reports on its progress and plans to the senior leadership team of Sysco.

- Sysco began to measure and document relevant key performance indicators, including the percentage of suppliers who engage with and maintain Sedex membership and the percentage of suppliers who have completed the latest Sedex Self-Assessment Questionnaire.
- During the last 12 months there have been no reports of slavery or human trafficking within the Sysco supply chain.

#### Further Steps

Sysco recognises that more can always be done to tackle Modern Slavery and, as a business, Sysco remains committed to increasing awareness of the issues and to a process of ongoing review of practices and policies to combat the risk of slavery and human trafficking. In the next 12 months Sysco intends to take the following steps to continue to further combat these risks:

- The next mandatory roll-out of the Sysco Code of Conduct training to all colleagues will take place in March 2026. Networked colleagues will complete this online; non-networked colleagues will receive face-to-face training. Sysco can monitor and follow up completion of the training by individual colleagues on the new “Workday” learning platform.
- Sysco will build on the existing online Modern Slavery training on the Sysco online “Workday” learning platform by providing additional targeted human rights training to all Sysco colleagues with responsibility for procurement and supplier relationships, including Procurement, Technical/QA, Legal and Merchandising. This will take place in March/April 2026 and will take the form of online workshops on human rights in food supply chains. This will be delivered by a third-party specialist provider and will cover: the business case for respecting human rights; the legal foundations; key risks and issues, including real life cases spanning modern slavery and child labour; what businesses should do to prevent and address risks; and how to react when human rights have been harmed. It will also cover how to talk to suppliers about the topic, and what Sysco colleagues can do in their day-to-day roles to make a difference. These sessions will be recorded so that new starters can access this training content, as part of their induction.
- Sysco’s Legal, Technical/QA, Sustainability and Procurement colleagues across the EU are preparing for the EU Forced Labour Regulation and the Corporate Sustainability Due Diligence Directive, and will be working to integrate the broader due diligence and internal process expectations into Sysco’s supplier onboarding, audit and risk assessment programmes, to ensure that Sysco is prepared for robust multi-jurisdictional compliance and keeps pace with evolving EU human rights standards.
- Sysco will continue to work closely with the Global Ethics & Compliance and Investigations teams at Sysco Corporation, to ensure that best practice and knowledge is shared on the risks of modern slavery in Sysco’s global supply chain.

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



**Paul Nieduszynski, CEO, Sysco GB Limited**

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