

# LOVEJOYS



## Modern Slavery and Human Trafficking Policy

### **Introduction**

This statement sets out Lovejoys' actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains.

This policy applies to all individuals working for Lovejoys or on Lovejoys' behalf in any capacity, including employees, directors, officers, agency workers, agents, contractors, consultants and business partners.

### **Our view on modern slavery and human trafficking**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. Lovejoys Wholesale has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity and transparency in all of our business dealings.

We recognise that we have to take a serious approach to slavery and human trafficking and our organisation is absolutely committed to preventing slavery and human trafficking in our activities, and to ensuring that our supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

This statement covers the activities of Lovejoys Wholesale Limited.

Our business is a wholesaler of fresh produce, larger products such as dried goods, dairy products, a range of frozen and chilled products etc. We buy from local businesses such as farmers and local manufacturers whenever possible, otherwise sourcing from other suppliers some of which are abroad.

We are taking steps to improve suppliers' practices, including providing advice to suppliers and requiring them to provide us with a modern slavery statement or discuss how they ensure that they are compliant with UK law surrounding modern slavery and working with us on an action plan.

We will ensure that we cease supply from suppliers who fail to improve their standards in line with an action plan or seriously violate ethical and legal standards.

### **Performance indicators**

We will implement systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our own business or within our supply chain, and the same high standards are expected from all of our suppliers, contractors and business partners.

We have reviewed our business practices to identify our KPIs (key performance indicators) and as a result have identified the following:

- We will require all managers involved in our supply chain to have completed training on modern slavery.

- We will develop a system for supply chain verification expected to be in place where we will evaluate the stance of potential suppliers on modern slavery before they enter the supply chain including any policies and practices in place for the business.
- We will review our existing suppliers and their standards at a minimum discussing any modern slavery statements and policies in place or plans to review business practices.

## **Training**

We will require all staff managing our supply chain to take online modern slavery training.

All staff working with our supply chain will take business relevant training covering:

- Our businesses purchasing practices which influence supply chain conditions which should be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger Together" initiative;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies;
- What steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including the removal from our supply chains.

## **Awareness raising programme**

As well as training staff, we will raise modern slavery awareness by putting posters up for staff in our premises and other communications detailing what employees can do to flag up potential slavery or human trafficking issues to the relevant parties in our organisation and what external help is available, for example through the Modern Slavery Helpline.

## **Responsibility and enforcement**

The board of directors has the overall responsibility for ensuring that this policy complies with the company's legal and ethical obligations, and it shall provide adequate resources to ensure that slavery and human trafficking are not taking place within the company's supply chain. Directors also have a day-to-day responsibility for implementing this policy and its objectives, and for auditing internal control systems and policies and procedures to ensure they are effective.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

### **Breaches of policy**

If any employee suspects a breach of this policy has occurred, or may occur, it must be reported to the line manager or the Company Secretary. Lovejoys is committed to ensuring that no one suffers any detrimental treatment as a result of reporting their concerns.

Any employee who is found to have breached this policy will be subject to being sanctioned under our disciplinary procedure with the possibility of dismissal. If any supplier, contractor or other business partner is found to be operating in breach of this policy, the company may terminate its relationship with them.

### **Company approval and review**

This statement is approved by:

Ben Mortimer Company Director

George Mortimer Company Director

Tracy Hillier Company Director

Date: 05/10/2023