

## Purpose

Fresh Connect is committed to preventing any form of modern slavery, human trafficking, forced labour, or exploitation in our operations and supply chains. We believe in conducting business with integrity, respecting human rights, and ensuring fair, safe, and ethical treatment of everyone involved in the production, processing, and distribution of fresh fruits and vegetables.

## Scope

This policy applies to all Fresh Connect employees, contractors, agency workers, suppliers, business partners, and others involved in or connected to our operations including those in direct and indirect supply chains, both within the UK and internationally.

## Our Commitment to Ethical Practices

### 1 Zero-Tolerance Policy

Fresh Connect has a zero-tolerance approach to all forms of modern slavery and human trafficking. Any evidence of such practices will result in immediate and appropriate action, including termination of contracts and reporting to the relevant authorities.

### 2 Risk Assessment & Due Diligence

We proactively assess risks of modern slavery based on sector, geography, and workforce composition. We conduct due diligence on all suppliers, contractors, and business partners, which includes:

- Requiring anti-slavery declarations
- Reviewing supplier modern slavery policies
- Site audits and ethical assessments where appropriate

We will not work with any organisation that fails to meet our ethical standards.

### 3 Supplier Engagement

Suppliers are expected to uphold the principles outlined in this policy and are encouraged to adopt their own ethical sourcing policies. We require suppliers to:

- Sign a commitment to anti-slavery practices
- Cooperate with audits and spot checks
- Demonstrate how they monitor their own supply chains

## Training and Awareness

We provide modern slavery awareness training to:

- All new employees at induction
- Senior managers on an annual basis

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Training covers:

- Recognising signs of modern slavery
- Legal responsibilities under the Modern Slavery Act 2015
- How to report concerns confidentially

### Reporting Concerns

Fresh Connect encourages open reporting of concerns relating to modern slavery or unethical behaviour. Reports can be made confidentially to Brogan Burke, HR Manager, [brogan@freshconnectuk.com](mailto:brogan@freshconnectuk.com)

We protect whistleblowers and ensure no one faces retaliation for reporting concerns in good faith.

### Continuous Monitoring & Improvement

We regularly review our policies, supplier relationships, and risk areas to:

- Improve our ethical sourcing practices
- Monitor ongoing compliance
- Strengthen protections across our supply chain

Our modern slavery controls are reviewed annually by the leadership team and improved where necessary.

### Collaboration with Authorities

Where modern slavery is suspected or confirmed, we will:

- Support affected individuals
- Fully cooperate with law enforcement and safeguarding bodies
- Ensure immediate steps are taken to prevent recurrence

### Compliance with Legislation

Fresh Connect complies with:

- The UK Modern Slavery Act 2015
- Any other applicable UK or international laws relating to human rights, employment, and ethical sourcing

*If required under Section 54 of the Modern Slavery Act, Fresh Connect will:*

- *Publish an annual Modern Slavery and Human Trafficking Statement*
- *Obtain board-level approval and director signature*
- *Make the statement publicly available on our website*

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## Governance and Accountability

Responsibility for the implementation of this policy rests with:

- **Policy Owner:** Brogan Burke
- **Senior Leadership:** Responsible for policy oversight and resources
- **All Employees:** Responsible for compliance and reporting concerns

This policy will be reviewed annually and updated to reflect legislative or operational changes.

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