



# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT ANDROS UK

---

Page | 1

## 1. KEY DETAILS

- Policy prepared by : ANDROS UK Limited
- Approved by board / management on : 16<sup>th</sup> June 2025

## 2. MODERN SLAVERY POLICY

Modern slavery is a crime resulting in a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced, compulsory labour and human trafficking ; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

At ANDROS UK, we are committed to upholding the highest standards of ethical conduct and human rights in our operations and supply chains.

This statement has been prepared in line with the **Modern Slavery Act 2015 (MSA)**. This policy outlines our commitment to preventing modern slavery and human trafficking in all aspects of our business activities and how the organisation manages and assesses its own operations alongside our suppliers to protect workers from being abused and exploited in our own organisation and our supply chain.

## 3. DEFINITIONS

Our understanding of slavery and human trafficking is based on the definitions set out in the **MSA 2015** which highlights that slavery can occur in a number of forms and typically includes:

- **Slavery and Servitude** – the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her conditions.
- **Forced or compulsory labour** – involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.



- **Human trafficking** – requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them.

#### 4. SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners associated with ANDROS UK, both domestically and internationally. It encompasses all aspects of our operations, including procurement, production, distribution, and partnerships, and extends to our supply chains, from raw material sourcing to finished product delivery. This Modern Anti Slavery Policy and Statement is intended for businesses in all countries, especially the United Kingdom.

#### 5. BUSINESS STRUCTURE

Our core business, within the UK, is the importing of jams, preserves, compote and our state of the art dedicated facility manufactures chilled desserts that are sold through the grocery, convenience, discounters, food service and industrial channels.

With an office in London and a manufacturing site (registered office) based in Oldford, Frome, Somerset.

Our team: 207 staff at the Oldford, Frome, factory / 32 staff at the Hammersmith, London office.

#### 6. RESPONSIBILITIES FOR THE POLICY

Whilst it is every employee's responsibility to be aware of and highlight any areas of potential risk, overall responsibility for ensuring that the company, its associated organisations and supply chain are compliant in relation to the **MSA 2015** lies with the Managing Director.

Our organisation has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. We also have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

##### Management:

- Management is responsible for establishing a culture of zero tolerance towards modern slavery and human trafficking within the organisation.
- Management must ensure that appropriate policies, procedures, and training programs are in place to identify, prevent, and address instances of modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.



- Management should provide leadership and resources to support the implementation of this policy and promote transparency and accountability throughout the organisation.

#### Supply Chain:

- The supply chain teams are responsible for conducting due diligence on suppliers and business partners to assess their compliance with anti-slavery and human trafficking laws and standards.
- They must incorporate contractual provisions and supplier codes of conduct that prohibit modern slavery and require suppliers to uphold ethical labour practices.
- The supply chain teams should work collaboratively with suppliers to address any instances of modern slavery identified within the supply chain and support remediation efforts.

Page | 3

#### Employees:

- All employees are responsible for familiarising themselves with this policy and understanding their role in preventing modern slavery within the organisation and its supply chains.
- They must report any concerns or suspicions of modern slavery to management or the designated compliance officer promptly.
- Employees should participate in training and awareness programs to recognise the signs of modern slavery and understand their responsibilities in upholding ethical labour practices.
- Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

## **7. POLICY PRINCIPLES**

We recognise that modern slavery is a complex supply chain issue and we work in partnership with our customers, suppliers and other organisations to sustain long-term solutions to this issue. We are committed to acting ethically and with integrity in all our business relationships.

**Zero Tolerance:** ANDROS UK has a zero-tolerance policy towards modern slavery and human trafficking in all its forms and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We will not knowingly engage in or support any activities that involve modern slavery, forced labour, or human trafficking.

**Due Diligence:** We are committed to conducting due diligence on our operations and supply chains to identify and address risks of modern slavery. This includes assessing the labour practices of suppliers, subcontractors, and business partners and taking appropriate action to mitigate risks.

We consider that the greatest risk of slavery and human trafficking is in our supply chain which includes the sourcing of raw materials, products, packaging and services and where we undertake procurement activities and where operations and managerial oversight are out of our direct control.



As part of our initiative to identify and mitigate risk where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour. With regards to national or international supply chains, we do expect these entities to have suitable Anti-Slavery & Human Trafficking policy and process. We expect each entity in the extended supply chain to at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

Page | 4

**Transparency and Accountability:** We will maintain transparency in our operations and supply chains regarding efforts to prevent modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

**Continuous Improvement:** We are committed to continuously improving our policies, procedures, and practices to prevent modern slavery. We may amend this policy at any time, we will regularly review and update this policy to ensure its effectiveness and alignment with British legislative requirements and international best practices.

## **8. COMPLIANCE WITH THE POLICY AND REPORTING**

You must ensure that you read, understand and comply with this policy. Any instances of modern slavery or human trafficking identified within ANDROS UK, or its supply chains must be reported immediately to management or the designated compliance officer. Reports will be investigated promptly, and appropriate remedial action will be taken in accordance with applicable laws and regulations.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your management as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or a company Director or report it in accordance with our *Whistleblowing Policy* as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your management. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.



## 9. COMMUNICATION, TRAINING AND AWARENESS OF THIS POLICY

ANDROS UK will provide training and awareness programs to employees, contractors, and suppliers to educate them about modern slavery, its signs and indicators, and their responsibilities in preventing it. Training will be conducted regularly to ensure that all relevant stakeholders are equipped with the knowledge and tools to address modern slavery effectively. We ensure that we have competent individuals within our Company who are aware of the standards we require. We have in place a Whistleblowing Policy to encourage the reporting of concerns and the protection of whistle blowers. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Page | 5

## 10. BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We will assess any instances of non-compliance on a case-by-case basis and will then tailor remedial action appropriately. We reserve the right to terminate our relationship with a supplier if issues of non-compliance with our policies are discovered and those issues of non-compliance are not addressed in a timely manner. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 11. REVIEW AND UPDATES

This policy will be reviewed annually to ensure its effectiveness and compliance with British legislative requirements and international standards, unless circumstances dictate that it should be reviewed and/or renewed more frequently. Updates will be provided using established methods of communication between the business and you.

## 12. QUESTIONS OR COMPLAINTS

Should you have any questions regarding this statement, please contact:  
**Stephanie LITTLE - People and Development Manager**  
Email: [stephanie.little@androsuk.co.uk](mailto:stephanie.little@androsuk.co.uk)  
DI: +44 (0) 1373 456083

Signed on behalf of Andros UK Ltd by :



**Jean LOUET,**  
Managing Director



