

Lakeside Food Group Limited - Slavery and Human Trafficking Statement for the Financial years of April 2019-April 2020.

Our Business Structure and Supply Chain: Lakeside Food Group was established in 1989 and currently employs 39 staff across our offices in UK (H.O.), ROI, Poland, Hungary, Thailand and China. Lakeside globally sources multi-protein products from our manufacturing partners in the United Kingdom, Mainland Europe, and The Far East (Thailand, Vietnam, China). We do not own manufacturing, distribution or storage companies, but activities such as these are outsourced to third parties. Our customer base is primarily located in the UK and ROI.

Policies

At Lakeside, we have carried out a review of our current internal policies and created a number of new documents to strengthen systems that help prevent Modern Slavery & Human Trafficking in our immediate business and throughout our supply chains.

The **Employee Handbook** has been reviewed and updated with the advice of a consultancy business that provides support and expertise in the areas of Human Resources and Health & Safety. Some key amendments include the addition of a Disciplinary Procedure, Anti Bribery & Corruption Policy and Whistle Blowing Policy. These policies are issued to new employees during their business induction. All policies are available on the company intranet.

A lengthy clause has been added to our **Business' Terms & Conditions** requesting supplier commitment to the prevention of Modern Slavery & Human Trafficking. This has been combined with our newly issued **Ethical Trading Code of Conduct**, also included with our Ts&Cs. This Code of Conduct draws from the ETI base code and lays down the minimum standards expected from suppliers. To date, we have full co-operation and suppliers are willingly signing up to these commitments. The aim is to continue this progress across our entire supply chain.

Lakesides' Ethical **Self-Assessment Questionnaire** (SAQ) has been revised to a format that adequately assesses compliance to our Code of Conduct and thereby highlights any areas of weakness that our suppliers may have. An additional section has been added to the SAQ to assess our suppliers' awareness of the Modern Slavery Act 2015.

Revision of Lakesides **Ethical Trading Policy** and our **Responsible Sourcing & Recruitment Policy** are at final draft stage.

Due Diligence Processes & Risk Assessment

Lakeside Food Group is a member of **SEDEX** (Supplier Ethical Data Exchange), a not-for profit organization which is dedicated to driving improvements and ethical business practices in global supply chains. We encourage our suppliers to take part in the SEDEX program and to subscribe to independent ethical auditing. We are continuing to build relationships with our suppliers and customers through the Sedex platform and reports are held on file for review.

The revised SAQ has been sent out to tier one protein suppliers. The completed SAQ along with the suppliers' geographical location and other business criteria are used to rate the risk of Modern Slavery & Human Trafficking. Suppliers are risk rated red (high), amber (medium) or green (low).

The overall aim is to ascertain the areas of biggest risk and to focus our efforts accordingly, to help our suppliers to improve.

As a business, the expectation is to gain the most influence over our tier one suppliers. However, we intend to extend our diligence and risk assessment process across our wider supply base to include suppliers of product packaging and ingredients, together with outsourced services, such as cold storage and transport. This process has been added to our approval system for new suppliers.

Effectiveness & KPIs

Lakeside is committed to being open, honest and appropriate about communicating our challenges and achievements in this very important area of our business.

In order to assess the effectiveness of our modern slavery prevention measures, we will be reviewing the Key Performance Indicators listed below. The intention is to expand on this list as we progress on our journey.

- Percentage of:
 - Suppliers committed to our revised Ts&Cs and Code of Conduct.
 - Tier one suppliers with Sedex membership.
 - Tier one suppliers with completed SAQs.
 - Tier one suppliers with a completed risk assessment.
 - Red / Amber / Green risk ratings.
 - Relevant employees that have been trained.
- The number of slavery incidents reported in the supply chain.

Training

Project leaders have completed formal training provided by Stronger Together on 'Tackling Modern Slavery in Global Supply Chains'.

The content of the above and other online resources were used to develop an 'in house' training module and this training was rolled out to the Board of Directors and relevant employees within Lakeside.

Due to the nature and size of our business, training will not be required for all employees. New employees will be provided this training, as and when it is deemed appropriate to their job roles and responsibilities.

Adrian Carr, Trading Director



Gail Hodson, Technical Director



Gary Irvine, Managing Director



Hayley Toleman, Finance Director

