

# Modern Slavery Statement FYE 2022

Vibrant Foods Limited is a leading manufacturer and distributor of South Asian foods in the UK with the following brands in its portfolio: TRS, East End Foods, Cofresh, Everest Dairies and Fudco. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2022 and sets out the steps Vibrant Foods Limited has taken to ensure that modern slavery or human trafficking is not taking place within our manufacturing operations or supply chain. All the policies and practices outlined within it apply to all entities within the group, including: Vibrant Brands Limited and TRS Wholesale Co Limited.

## ORGANISATIONAL STRUCTURE

Vibrant Foods Limited and its subsidiaries are primarily involved in importing, processing (cleaning, grinding, milling, and packing), and distributing various ethnic food products (including spices, grains, pulses, nuts, rice, flours, and canned vegetables) in the UK and across continental Europe. We also manufacture ethnic snacks (crisps, grills, and mixed savories). We employ 600+ people across our manufacturing / packing facilities and our central office. We work with over 100 direct suppliers based around the world sourcing raw materials from countries including (but not limited to) India, China, Canada, the USA, Australia, and Italy.

## APPROACH

Vibrant Foods has a zero-tolerance approach to any form of modern slavery, including servitude, human trafficking and forced labour. We recognise that food production and processing may be especially vulnerable to modern slavery given the complex and global nature of its supply chains; and are committed to putting systems and controls in place that can help safeguard against any form of modern slavery. Our current approach focuses on two main areas: our owned and operated manufacturing facilities in the UK, and our relationships with direct suppliers globally.

## POLICIES AND PRACTICES

We have several policies and practices in place to ensure we are conducting our business in an ethical and transparent manner when it comes to both our owned operations, and our relationships with our suppliers.

When it comes to our owned operations, our robust recruitment practices include conducting eligibility to work in the UK checks for all employees to safeguard against individuals being forced to work against their will. When recruiting, we only partner with reputable employment agencies with a formal agreement in place that ensures they are similarly diligent in their checks.

We also have a formal whistleblowing policy that encourages our employees as well as any third parties to raise any concerns related to our activities or supply chains, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to report disclosures without fear of reprisals and includes a confidential helpline run by an external, and independent third-party.

When it comes to our suppliers, we expect all our product suppliers to comply with the principles of the Modern Slavery Act and our ESG questionnaire contains questions intended to surface the policies and practices they have in place to prevent modern slavery in their supply chains. If we were to learn of any instances of modern slavery associated with a given supplier we would invoke appropriate sanctions and require them to update their practices to safeguard against future instances. If we do not see adequate improvement, we will consider immediate termination of the business relationship.

#### **TRAINING AND ORGANISATIONAL AWARENESS**

All employees receive an explanation of Modern Slavery and the company's commitment to safeguarding against it in our company's People Hub (an online version of our employee handbook which contains all our people policies and guidelines) and in their induction.

We also offer a Modern Slavery course via our learning management system (LMS) and can track training completion rates across our group.

#### **PERFORMANCE AND PLANNED PROGRESS**

This is Vibrant Foods' third statement in compliance of the Modern Slavery act. In 2020 we were a newly formed group, and in 2021 we focused on integrating processes and practices, including those related to modern slavery, across all our brands and business. In 2022, we focused on deepening understanding amongst our workforce on what modern slavery is.

Internally, we launched a new learning management system and intranet to deliver comms and training to our people. We developed a course on Modern Slavery for this platform which outlined the various forms modern slavery can take, how you might be able to identify whether someone is a victim of modern slavery, and what support is available (from the company and external third parties). On the supplier side, we wrapped up a project assessing key suppliers in India and also introduced a new ERP that will help us integrate our procurement across brands and maintain better procurement data.

In 2023, we plan to develop a new supplier strategy and a set of minimum standards around quality and impact that will encompass topics connected to the issue of modern slavery.

**This statement was approved by the board of Vibrant Foods Limited on July 10th 2023. It will be reviewed and updated annually.**



**Michael Hall**  
**DIRECTOR**  
(On behalf of Vibrant Foods Limited)

**Date: July 10th 2023**