

Modern Slavery Act Statement

Transparency in Our Supply Chains

April 2015-March 2016 Financial Year

Context

▪ Our Business

Lovering Foods is a leading UK-based value-added supplier of ambient canned goods, founded in 1979. Our product range includes fruit, vegetables, Oriental goods, and seafood, which we sell under our private labels Kingfisher and Royal Line and under many major supermarkets' own labels. The majority of our trade is in seafood, with circa 50% of that consisting of tuna. Our seafood is sourced internationally from countries such as Thailand, Ghana, Indonesia and the Maldives. Lovering does not own or operate any processing facilities.

▪ Industry Challenges

Awareness of labour issues in the seafood industry has increased in recent years through a number of high-profile media cases. Lack of traceability is a common key factor in these cases of forced and/or underage labour. Lovering Foods has a publicly stated commitment to 100% traceability in our full product range and continuously strives to mitigate risks of labour issues in our complex international supply chains.

Progress and Due Diligence

▪ Collaboration

To confront the issues facing our industry, we work closely with our suppliers and customers and partner with a number of external organisations. We are a Participating Company of the [International Seafood Sustainability Foundation \(ISSF\)](#), an interdisciplinary organisation working to improve sustainability and traceability in the tuna industry. Further, as active members of the [Supplier Ethical Data Exchange \(SEDEX\)](#), we track suppliers' progress towards an independently verified ethical standard underpinned by the [ETI Base Code](#). We use our variety of third-party connections to continuously develop, evaluate, and improve our internal policies and procedures.

▪ Our Policies

Tuna makes up the majority of our trade and we have therefore focused our initial efforts in this area of our business. We are currently enforcing two relevant policies:

- [Sustainability Policy \(2015\)](#) – This is publicly available on our website;
- [Tuna Sourcing Policy \(2015\)](#) – This requires our tuna suppliers to increase transparency & traceability on the vessels they source from, including by checking working standards on vessels at least yearly.

▪ Our Procedures

Lovering Foods is a SEDEX member and uses the [SEDEX Advance](#) platform to gain visibility of working conditions at processing sites. Currently, more than 75% of our suppliers are registered. Upon registration, a desktop audit called a 'Self-Assessment Questionnaire' (SAQ) is completed by the supplier. We then use customer specifications and risk assessment procedures to determine whether an on-site ethical audit is required. Sites identified as medium or high risk are required to conduct a [SEDEX Members Ethical Trade Audit \(SMETA\)](#) from a certified auditing body at a frequency determined by our customers, and, if necessary, will be given corrective measures to apply within a set timeframe.

Our dedicated Technical team ensures all products undergo a rigorous approval procedure before reaching our customers. This includes a variety of quality, food safety, and traceability verifications.

▪ **Training**

The Corporate Social Responsibility (CSR) Department is responsible for all aspects of ethical trade at Lovereing Foods. As such, they maintain relationships with external organisations and attend relevant workshops and conferences, such as the 'Stronger Together' workshop on eliminating modern slavery from supply chains (London, August 2015) and the SEDEX conference 'Simplifying Supply Chain Sustainability' (London, March 2016). Information received from these workshops, important news regarding ethics and sustainability, and regular updates on the progress Lovereing Foods has made is shared with all employees to ensure that staff are clear on our responsible sourcing goals. Further, as part of the induction process, new staff members are introduced to the policies discussed above and are made aware of the business's values and practices as they relate to responsible sourcing.

Next Steps

Over the upcoming financial year (April 2016-March 2017), we aim to develop and strengthen our responsible sourcing as follows:

- Further develop our CSR Department, dedicating a team member to ethical trade;
- Formalise and strengthen Lovereing's private label risk assessment procedure and ethical sourcing policy;
- Ensure that all suppliers are SEDEX members, have a completed SAQ, and have conducted ethical audits as necessary according to their risk assessment outcome;
- Conduct ethical risk assessments on all Kingfisher and Royal Line supply chains, and own-label supply chains where a retailer's own policy is not available;
- Continue to expand our third-party engagement through the following steps:
 - o Become an active member of the [Sustainable Seafood Coalition \(SSC\)](#), and thus contribute to the establishment of UK-wide standards on seafood labelling, risk assessment, and fishery improvement efforts;
 - o Participate in conversations organised by groups such as the ISSF and SSC on the development and application of external risk assessment tools, such as the Seafish [Risk Assessment for Sourcing Seafood \(RASS\)](#) tool and the [SEDEX Risk Assessment Tool](#);
 - o Participate in discussions with suppliers, industry associations, and environmental groups on how to improve on-board monitoring on the wide range of fishing vessels we source from;
 - o Further collaborate with customers and other suppliers to share best practice and find more practical and effective ways of mitigating risk in the supply chain.
- Continue to visit major seafood sourcing ports to expand our internal knowledge base and validate responsible sourcing claims;
- Continue mapping our entire supply chain to facilitate the identification of areas of risk.

Beyond March 2017, we plan to expand the scope of our responsible sourcing policy to include our fruit, vegetable, and Oriental goods supply chains. We have decided to focus first on our seafood supply chains as this industry is of a higher risk.

Contact Information

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Lovereing Foods recognises our responsibility to source products with respect for the environment and people, and we take pride in our proactive approach. Responsible sourcing is an ongoing process, not an end point; thus, we welcome the opportunity to report yearly on our progress through the Modern Slavery Act Statement.

Signed:



Position:

Managing Director