



STATEMENT AS OF 13 MAY 2023

MODERN SLAVEY POLICY

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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.

We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking within all of our business activities. Pursuant to section 54 of the Modern Slavery Act 2015 (the "**Modern Slavery Act**"), we offer the following statement regarding our efforts to prevent slavery and human trafficking both within our business, and within its supply chain, for the financial year ended 28th February 2023.

Our business

Lynn's Country Foods Limited, together with group companies The Finnebrogue Bacon Company Ltd and Finnebrogue Vegetarian Company Limited, is a food company with around 1,100 employees, specialising in the production of quality sausage, burger, stuffing, bacon, pigs-in-blankets and more recently meat-free products and trading as Finnebrogue ("**Finnebrogue**"). The company currently has 4 factories all located in Downpatrick, Northern Ireland.

We have built our business on crafting artisan food that makes a difference, from the welfare of the animals and stewardship of the land to the way we treat our colleagues. Our dedication to food safety and quality, sustainability and passion for great food is the driving force behind everything we do; and our integrated business model adopts the principles of quality, integrity and customer satisfaction.

Our policies on slavery and human trafficking

Finnebrogue respects and acknowledges internationally recognised human rights principles. Within our company and throughout our supply chain, we are committed to treating people with dignity and respect. Finnebrogue's internal policies include our Human Rights Policy and our Company Code of Conduct which both reflect our commitment to acting ethically and with integrity in all of our business relationships. We will not tolerate any abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected or protected.

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Our commitment

Finnebrogue acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Finnebrogue also understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains. Finnebrogue works closely with suppliers and customers to adhere to these commitments in tackling Modern Day Slavery.

Finnebrogue does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Finnebrogue in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Finnebrogue strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in Northern Ireland and in many cases exceeds those minimum standards in relation to its employees.

Our supply chain

We work within a large, diverse value chain of business partners and stakeholders. There are often two to five levels of suppliers between us as an end user and the source of raw materials that enter the manufacturing process. We recognise that each entity in this chain has its own independent duty to respect human rights.

We expect our business partners and stakeholders to adhere to ethical business conduct consistent with our own, and are committed to working with them to fulfil this common goal.

What have we done?

As part of our initiative to identify and mitigate risk, we have adopted a number of due diligence procedures and mechanisms, including:

- We have embraced the [Stronger Together Programme](#) within our business, and we support the work being done to reduce forced labour and human trafficking in the UK. Our HR Team have been externally trained in the exploitation of human labour and the importance of our internal recruitment processes. Senior managers have also received training in the Stronger Together principles and are aware of the risks and signs of Modern Slavery.
- We provide mechanisms to our employees to raise issues and concerns, via the Employee Voice, our open door policy, and our confidential whistleblowing hotline to make it easier for employees to make disclosures or raise concerns, on an anonymous basis and to do so without fear of recrimination or retribution.
- We monitor ethical standards across the business on a regular basis both internally and via external third party audits. We undergo unannounced Ethical Audits by virtue of our membership of SEDEX (<https://www.sedex.com>) as well as customer ethical trade audits, and these are supported by our own internal ethical verification audits.
- The business is a buyer/supplier (**'AB'**) member of SEDEX and our suppliers register with SEDEX and make their ethical data visible to us, enabling us to drive ethical standards

within our supply chain. At 1st January 2023, we have over 162 suppliers linked to us on SEDEX. All suppliers are requested to be SEDEX registered, and they also must agree to our Supplier Code of Conduct which outlines our minimum ethical expectations.

- We have operated a risk-based approach in the steps we have taken that seek to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business. Through the use of a broad enterprise-wide slavery and human trafficking risk assessment we seek to focus our relevant policies, standards, practices and programmes on those parts of our supply chain and our business – and upon those geographies – where we believe greatest risk of slavery and human trafficking lies. Our initial focus has been on primary supply.
- We also make sure that our suppliers are aware of our policies and commitment to eliminating modern slavery or human rights abuses from our supply chain and that they commit to adhering to the same, high standards.

Our effectiveness in combating slavery and human trafficking

The Ethical Audits conducted via external auditors through SEDEX and referred to above bring insights on ways we can tackle slavery and human trafficking. The following key performance indicators (KPIs) have been set out to assess how effective we are being in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Number of managers (%) trained on modern slavery
- SEDEX compliance from all suppliers (% of suppliers connected with on SEDEX)
- SEDEX SAQs reviewed annually
- All employees provided with employment contract within one week of starting with Finnebrogue
- Number of managers (%) trained on Dignity at Work
- All staff concerns raised through the grievance procedure are addressed within a timely manner (5 working days for initial response)
- All suppliers to read and agree to our Supplier Code of Conduct

What will we do next?

Finnebrogue will maintain the current controls in place over the next twelve-month period. Additional activities will include:

- An increased focus within the supply chain beyond a primary level, with completion of risk assessments (and associated corrective actions) at a secondary and tertiary level.
- Remediation plan to be formalised with an action plan to address any modern slavery issues raised
- Continue to work with all employees, signposting all available grievance and whistleblowing mechanisms to raise concerns.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act and constitutes our human trafficking statement for the financial year ending 28th February 2023. It was approved by the board of directors of Finnebrogue on 3rd May 2023.



By order of the Board

A handwritten signature in black ink, appearing to read "Andrew Nethercott".

Andrew Nethercott, Chief Executive Officer