

	<b>Food Forensics Ltd</b> 5 Frensham Road Sweetbriar Industrial Estate Norwich NR3 2BT	<div style="text-align: center;">   <b>UK Modern Slavery Act Statement</b>  <b>Financial Year 2020/21</b> </div>	Document number: P133-1 Revision Date: 02/07/20
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## UK Modern Slavery Act Statement Financial Year 2020/21

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and covers our financial year to 30/06/2020. It details the steps that Food Forensics has taken and will implement in our upcoming year to tackle modern slavery and human trafficking within our business and supply chains.

### Organisation structure and supply chains

Food Forensics was formed in 2011 as a result of an identified need to protect both consumers as well as genuine producers and processors from fraudulent labelling within the Food & Drink sector. Our laboratory is situated in the UK in Norwich and was ISO/IEC 17025:2005 accreditation in 2014 for its Stable Isotope Ratio Mass Spectrometry and in 2015 added accredited DNA speciation testing to its portfolio. In 2018, speciation by Next Generation Sequencing was added to the accreditation schedule, and in 2019 the laboratory was awarded ISO/IEC 17025:2017 accreditation. We are UKAS accredited for our operations and specific advisory services.

We employ 19 members of staff, all on full and part-time contracts, honouring EU minimum wage and working time directives.

We have 33 core Tier 1 suppliers of good and services such as IT, utilities and inputs, and 24 partners who provide outsourced services utilised by Food Forensics and our clients, in the main complementary businesses in the food scientific sector.

At Food Forensics we passionately believe in maintaining the integrity of the food supply system and are dedicated to working towards achieving this goal. This includes ethical standards and eradication of any forms of slavery at the heart of our drive for integrity.

### Policies in relation to slavery and human trafficking

Food Forensics supports the basic and fundamental human rights of all individuals and does not condone any form of modern slavery, human trafficking or exploitation within its business and supply chains. We adopt a zero-tolerance policy to any human rights abuses and will take appropriate action to ensure our employees understand and adhere to this policy.

We are therefore committed to tackling modern slavery and forced labour through a continuous improvement approach.

We have adopted the core 9 principles of the Ethical Trading Initiative (ETI) Base Code (<https://www.ethicaltrade.org/eti-base-code>) and the 8 core conventions of the International Labour Organisation (ILO) (<https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>) to ensure due diligence is applied throughout our business to identify, manage and mitigate the risk of modern slavery in our own organisation and those of our suppliers and sub-contractors.

## **Due diligence processes**

For this financial year we have appointed our first 'Social Compliance Officer' at Director level within the business (Rick Sanderson FIFST).

During this financial year we will be initiating our own *Ethical Trading Policy* and a *Supplier and Partner Code of Practice*. This will be supported by an initial Self-Assessment Questionnaire (SAQ), which will require robust evidence against our core standards and those set out in the ETI and ILO Base Codes and monitored throughout the year through a process of unannounced audit.

This information and commitment will be required retrospectively of all existing suppliers, and mandatory as part of our new vendor process from July 1<sup>st</sup>, 2020.

In addition, we will hold on file and scrutinise all suppliers of goods and services to Food Forensics that are required to publish a Modern Slavery Act 2015 Statement, i.e. all those above the current threshold of £36m in turnover with operating Head Offices within the UK.

## **Risk assessment and management**

Recognising that the risk of modern slavery is always present we will ensure that we review our internal strategic and operational approach at least annually.

We have carried out an initial risk assessment of our core Tier 1 supplier and partner base and concluded that our exposure to issues around Modern Slavery are relatively low. However, we recognise that our role is to safeguard against exposure to this issue and play our part in its eradication.

We have analysed our FY19/20 annual spend and drawn up a target list of the Top 20 by turnover. This represents a mix of large global companies with compliant Modern Slavery Act Statements and published programs, and smaller to medium size UK businesses sub- £36m turnover, who in the main do not have statements.

We have however identified two partner businesses in excess of the MSA statement threshold that do not appear to host a statement on their company website homepage. We will be investigating and requesting evidence and assurances to the contrary.

We have classified those without a statement as 'At Risk', of which there are 13 companies, and we will be working with these businesses with a request to complete a Modern Slavery SAQ issued by Food Forensics. This will be completed in the first half of FY20/21.

We also recognise that risks can be 'hidden' in our supply chains and we commit to working on a program to map those we work with both across and down our supply chains.

Where instances of modern slavery are uncovered, we will work to remediate effectively and ensure any workers are appropriately safeguarded and protected.

## **Section 54 Transparency in Supply Chains**

We understand that the risks of Modern Slavery are just as heightened beyond our Tier 1 supply base, and as such we have partnered with a leading software providers who will grant access to their supply chain mapping toolkit for identified “at risk” suppliers to Food Forensics, for them to attempt to map their supply chains.

The results of these efforts will be reported in next year’s Modern Slavery Act statement, FY21/22.

### **Key performance indicators to measure effectiveness of steps being taken**

We commit to tracking and maintain progress against the following key criteria:

- Significant Tier 1 suppliers MSA Statements Tracked and Scrutinised
- Supply Chain Maps instigated for ‘At-Risk’ Suppliers
- All staff trained to build capacity and spot the signs of Modern Slavery

### **Training on modern slavery and trafficking**

We are committed to training and raising awareness of our people and those who work for us so that we can better spot the signs of modern slavery and forced labour. Our Business Development Director has several years’ experience in this arena developing programs for business large and small and working with leading NGO Unseen UK (<https://www.unseenuk.org/>). During the first half of this financial year he will be carrying out ‘capacity building’ training for all members of staff.

This training will enable our employees to better understand and recognise modern slavery risks that might occur within our business and supply chains and informs them of the appropriate actions if such issues are discovered. We will also be providing an impartial whistle-blowing facility. Completion of these front line remediations will be monitored by our Human Resources officer.

The welfare of our people is paramount, and we are committed to ensuring our policies, practices and procedures reflect this and all appropriate employment regulations and legislation are fully adhered to.

### **Board approval**

This statement is made pursuant to section 54(1) of the Act, has been approved by the Board of Directors of Food Forensics and will be updated annually in line with the Modern Slavery Act’s reporting requirements.



Alison Johnson  
Managing Director  
**Food Forensics Ltd**