



# Modern Slavery Policy

## Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that the Frylite Group has taken and is continuing to take to ensure modern slavery or human trafficking is not taking place within our operations and supply chain during the financial year ending 31 March 2022.

The statement applies to the Frylite Group and its subsidiary organisations:

- Frylite Limited
- Frylite Food Waste Division
- Frylite Dublin Ltd
- Frylite Ireland Ltd

Frylite acknowledges its duty to notify the relevant authorities of any individual encountered in Northern Ireland and the Republic of Ireland who it believes is a suspected victim of slavery or human trafficking.

## Statement

Frylite is committed to respect human rights as laid out in the International Bill of Human Rights and the UK Modern Slavery Act 2015. Frylite has a zero-tolerance approach to Modern Slavery of any kind within our operations and supply chain. We will not appoint or work with any supplier who cannot demonstrate the same high level of commitment to this Act that Frylite applies, and we fully support the investigation and reporting of any supplier found to be in breach of our policy and approach to anti-slavery and human trafficking.

## Organisational structure and supply chains

As one of the leading suppliers of Vegetable Cooking oil and Collectors of Used Cooking, employing 215 people, we provide Vegetable Cooking to a range of Food Service and Manufacturers. With income of around £43 million, we provide a wide range of diverse goods and services sourced through the Island of Ireland. Frylite fully supports the Modern Slavery Act and takes its role seriously in ensuring that its supply chain is assessed and thoroughly checked to ensure compliance.

Suppliers of goods and services to Frylite must comply with legislation, regulation and standards relating to the relevant industry, including for example, child and

forced labour, health and safety of workers, non-discrimination, employment law, human rights, fraud, bribery and corruption. We ask all our suppliers to adhere to our Modern Slavery and Human Trafficking policy and our Supplier Code of Conduct under Sedex principles.

If we find evidence of a failure to comply with our policies, or a breach of the Supplier Code of Conduct, we will in the first instance try to work with them to improve standards and employee welfare. However, we reserve the right to terminate an arrangement with any supplier immediately for appropriate transgressions or where there is no willingness to make the necessary improvements.

## Due diligence

As part of our risk-based approach to achieving compliance with the Modern Slavery Act, Frylite undertakes due diligence when considering taking on new every day and preferred suppliers and commits to regularly reviewing existing relationships. The organisation's due diligence includes:

- Reviewing everyday suppliers to assess and monitor product, sector or geographical risks of modern slavery and human trafficking.
- Ensuring any new every day or preferred suppliers/contractors provide confirmation of their compliance with the Act.
- Promoting and educating compliance of the Act through our procurement policy and associated procedures.
- Reviewing our supply chain as a regular component of risk assessment and management to ensure that continued compliance is achieved.
- Ensuring contracts agreed with our suppliers reflect agreement and compliance with the Act.
- Taking appropriate reporting steps if we suspect any evidence of slavery or human trafficking has arisen in our supply chain.

## Relevant policies and practices

Frylite has in place the following policies and procedures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Modern Slavery and Human Trafficking policy - reiterating our stance against all forms of modern slavery, the policy outlines procedures and processes which are designed to guard against the occurrence of modern slavery or human trafficking in our business operations and supply chain.
- Supplier code of conduct and internal procedures to ensure these are applied to our everyday procurement activities - wherever possible Frylite insists on ethical standards from all suppliers. Suppliers are required to confirm that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- Procurement policy - outlines due process for the procurement of goods and services. A Questionnaire is used to assess whether an organisation satisfies

minimum levels of economic and financial standing and technical and professional capability.

- Whistle blowing policy - encourages Frylite representatives to raise any concerns related to the direct activities, or the supply chains of, the organisation without fear of reprisals. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- Safer recruitment policy - Where external agencies are used to support recruitment Frylite will only engage with recruitment agencies which share our commitment towards anti-slavery and the prevention of human trafficking.

## Training

Frylite representatives are required to familiarise themselves with this statement, our supplier code of conduct and our Modern Slavery and Human Trafficking policy. Specific training on eradicating slave labour or human trafficking is available, on request, to relevant members of staff. Any queries or questions must be directed to the procurement team who will be happy to assist.

## Our approach for continued improvement

- Managed review of internal procurement policies, procedures and guidelines that reinforce and compliment this statement.
- Risk categorisation on our preferred suppliers and approval via Sedex
- Further develop our risk methodology for modern slavery with external/internal auditors.
- Review and improve our tracking and monitoring of supplier assessments using new procurement technology.

This statement has been approved by the Frylite Board who will ensure it is reviewed and updated annually.

**Eamon McCay**

Date: