



## MODERN SLAVERY REPORT – 2017

Over the course of 2017 Froneri have been working to engage with a number of its tier 2 suppliers. The ultimate aim is to increase the visibility of Froneri's supply chain to help meet its CSR aims. The suppliers that are included were chosen from a third party audit company who conducted a pre-screen risk analysis. Its assessment was based upon geography, the commodity purchased, supplier quality performance, and the nature of the business transaction. All high and medium rated suppliers were invited to join the Supplier Ethical Data Exchange (SEDEX) and complete a Self-Assessment Questionnaire (SAQ) on labour management, employment, Health & Safety and Environment within their business.

The work involved SEDEX representatives engaging with the tier 1 agents who have direct relationships with the tier 2 suppliers. Through this communication SEDEX helped the tier 1 suppliers initiate indirect links with the tier 2 suppliers and Froneri. This allowed Froneri to see the site details, self-assessment questionnaire answers and any audits the supplier has uploaded or will upload in the future. In instances where the tier 1 agent is not on Sedex, we asked for permission to link Froneri directly with the tier 2 supplier.

SEDEX is currently engaging with 26 tier 2 suppliers with the help of Froneri and the tier 1 agents. The guidance and support the Sedex supplier engagement team provides those suppliers who are not on the Sedex system helps them to:

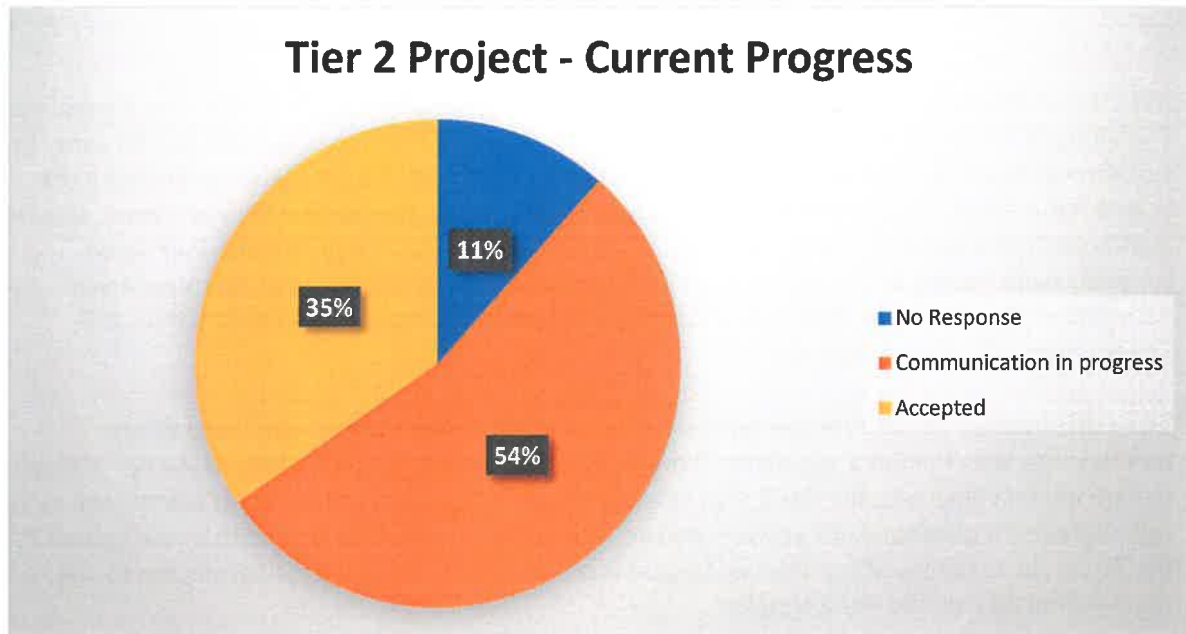
- Register on the system
- Create their sites
- Complete the self-assessment questionnaire
- Link with Froneri through the tier 1 supplier.

At present progress has been positive. We are beginning to see more communication with Tier 2 suppliers. At present, we have nine tier 2 supplier's that have accepted a link with Froneri. This represents 35%. Over the next few weeks or so we should see this number increase.

Communication is still ongoing with a number of the tier 1 agents at present but we have received no negative feedback from them. They are reaching out to the tier 2 suppliers to explain what this project involves. The tier 1 agents that have not come back to Sedex have been contacted by Froneri directly to prompt them to respond.



The below pie chart breaks down the current work done this year:



The work continues to run into 2018 and we are hoping to have a large percentage of the suppliers signed up and linked to Froneri on that year.

Going Further into 2018, Froneri will start focusing on those suppliers that were deemed low risk to gain further visibility of their supply chain. This will entail further supplier engagement work with SEDEX supporting the suppliers and helping them with the points mentioned earlier.

SEDEX will also be launching multi-tier linking and will help Froneri to set this up on the SEDEX Advance platform. This will enable Froneri to have at least four suppliers in a single chain increasing the visibility of the tier's further down the line. Sedex has recognised that the supply chain has continued to grow and visibility of this is key.

As part of our introduction to Froneri, all new starters undergo a period of induction training covering the ethical trading initiative base code, labour standards and modern slavery act and why they are so important to Froneri.

**Mike Fraine**  
Head of UK & Ireland