



MODERN SLAVERY REPORT – 2018

The Froneri mission remains to improve the visibility of the supply chain at tier one suppliers and beyond. Froneri is now engaging with lower tier suppliers with the objective of activating them on the ethical data platform, SEDEX.

Our strategy during 2018 has been to ensure the following:

- 2nd tier suppliers, classified into high, medium and low risk categories are registered on SEDEX.
- Increase supplier engagement to 90% of all suppliers to SEDEX
- To achieve at least 40% of suppliers with site ETI audit.
- All three UK sites to have an up to date ETI audit
- To re-enforce the visibility of Stronger Together initiative and the nature of hidden exploitation to all new employees and how to inform of any concerns.

To date we have achieved:

- 98% supplier self-assessment questionnaire (SAQ) engagement.
- Progressed 91% of supplier SAQ's with a >95% questionnaire response rate, with data collected across all four key pillars.
- We have checked the supplier ethical, environmental and social practices contained within each SAQ and from audit findings.
- 54% of our suppliers have had an Ethical Trading Audit. (see appendix 1)

We reviewed the audit information from the SEDEX platform, which enabled us to risk assess our suppliers. Where we identify higher risk suppliers we collaborate with the suppliers to reduce or mitigate the risks.

We achieved ethical trading audits at our three based UK factories during 2018. The results of all audits are posted on SEDEX.

Froneri supports the Stronger Together initiative aimed at reducing modern slavery. During 2018 we attended Stronger Together training sessions to increase our understanding of the nature of hidden exploitation and to prevent its occurrence. The resources provided by the Stronger Together campaign, including posters and leaflets are visible at each site and embedded in the company induction for all new employees to embrace the stronger together initiative. It provides a clear message to work together to tackle hidden labour exploitation and how to inform of any concerns.

Froneri provides a reporting hotline which is free, anonymous and confidential to allow employees to raise matters of concern. The contact details are displayed on notice boards at all UK sites and embedded within the induction programmes of all new starters.



The plan for 2019 is to continue engaging beyond the first tier and to work collaboratively with all tiers of the supply chain to ensure we reduce the risk of exploitation with the following targets:

- Ensure 100% of suppliers are registered to SEDEX
- Increase to 70% all suppliers to have or undertake ETI audits
- To further develop multi-tier linking to SEDEX and increase supplier visibility.

As part of this engagement we will ensure our due diligence checks are carried out at every stage of the process.

A handwritten signature in blue ink, appearing to read "Mike Fraine".

Mike Fraine
Head of UK & Ireland