



LDH (LA DORIA) LTD

**2021/2022 Modern
Slavery and Human
Trafficking Statement**



2021/2022 Modern Slavery and Human Trafficking Statement

Modern slavery is a global issue that affects millions of the most vulnerable people in society. LDH is committed to ensuring that the human rights of all workers in our supply chains are respected. This includes playing our part to eradicate modern slavery.

In 2020 and 2021, the COVID-19 pandemic has had an unprecedented impact on our employees', customers and the workers in our supply chains. It has also brought significant challenges to our business. Whilst continuing to develop our policies and supply chain due diligence, our focus for the last 18 months has been on the health and safety of our employees and where possible, supporting our suppliers.

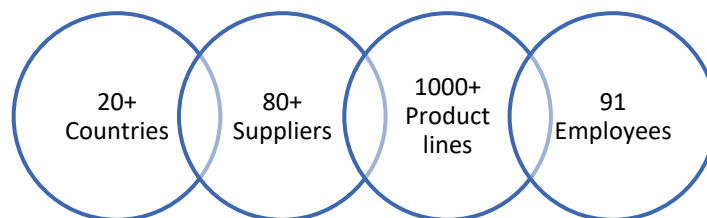
This is the sixth LDH Modern Slavery statement prepared in accordance with the Modern Slavery Act 2015. This statement refers to the financial year ending 31 December 2021 and outlines the steps taken by LDH to prevent, identify, and remediate modern slavery within our business and supply chains.

1. Our Business, Structure, and Supply Chains

LDH is an importer and distributor of ambient grocery food products, packed seasonally and throughout the year for the UK retail, foodservice and manufacturing sectors. The company ownership encompasses a small number of shareholders; Gruppo La Doria S.p.A, Thai Union Group PCL, Pastificio Di Martino Gaetano & Fili S.p.A, and LDH company Directors. As set out below, LDH have procedures in place to support the verification and monitoring of its suppliers to ensure that suppliers meet the standards that LDH expect.

The Responsible Sourcing Manager drives the development and implementation of all activities related to responsible sourcing and human rights, including modern slavery and human trafficking in our supply chains. The Technical Director, who sits on the Board of Directors, has oversight and close involvement with the responsible sourcing programme and informs all company directors of progress and issues on a quarterly basis. There is close contact on a regular basis with the Procurement team, and internal escalation mechanisms to Director and CEO level which have been effectively applied in the last year.

The company's focus is on private-label ranges, predominantly ambient pasta, vegetables, pulses, fruits, fish, chocolate, cooking sauces, condiments and meal kits. Due to the nature of products, the majority are sourced from outside the UK, with global sourcing of ingredients and commodities. Given that no country is fully exempt from modern slavery and human trafficking risks, we acknowledge that our supply chains and manufacturers need to be aware of and mitigate these risks. As their UK buyer, LDH has established due diligence and communication channels with suppliers which includes communicating customer human rights and ethical trade policies. We have developed strong, long-term relationships with our suppliers globally and have broadened our supply chain mapping process to cover an increased range of products back to source.



2. LDH policies and due diligence in relation to modern slavery

In line with the United Nations Guiding Principles on Business & Human Rights (2011), we are committed to upholding the principles set out in the UN Declaration on Human Rights and the International Labour Organisation (ILO) Declaration on

Fundamental Principles and Rights at Work (1998). Pursuant to these principles, LDH (La Doria) Ltd (LDH) has developed systems and controls to identify and address the risk of modern slavery within our business and supply chains.

In 2018, we began developing our responsible sourcing strategy. This included the creation and implementation of LDH’s responsible sourcing risk assessment framework. In early 2021, we enhanced our due diligence process by updating our risk assessment framework, and through the creation of a company-wide Human Rights Policy and a Supplier Code of Conduct, covering modern slavery and human trafficking. These documents were created with support from an external human rights consultant and from stakeholders across the business.

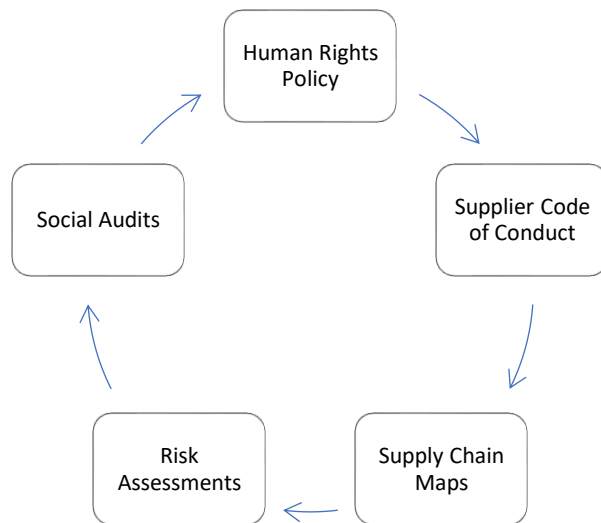
LDH has a whistleblowing policy which sets out the process for our employees to raise any concerns that they may have in relation to compliance with our legal obligations, including in relation to modern slavery and human trafficking. Our whistleblowing policy ensures that there is adequate protection for employees who raise grievances or make protected disclosures.

Site Approval

LDH have been a member of Sedex (Supplier Ethical Data Exchange) since 2007 and we require all of our suppliers to be Sedex members and to complete the Sedex Self-Assessment Questionnaire (SAQ). Updated on an annual basis, this is the first step in helping us understand at individual site level the working conditions, recruitment, labour management, policies and workforce demographics. In addition, we continue the process of mapping all supply chains back to source with in-depth details regarding farm workers and vessel crews.

Audits to assess compliance against the ETI Base Code and assessments such as GRASP are helpful in determining whether human rights risks and violations are present. But they are only one tool within the evolving LDH toolkit against modern slavery. Open and transparent relationships with our suppliers are also essential in order to know, understand and improve working conditions in our supply chains. Our assessment process for supplier selection is conducted with a view to forming long-term partnerships with frequent communication, both remotely and on-site. We carry out these assessments using a range of technical and ethical performance indicators and targets, including risk assessments, action plans, supply chain mapping and social audits.

Human Rights Due Diligence Process



Human Rights Policy

Our Human Rights Policy outlines the minimum standards that we follow, and that we expect our suppliers to follow in order to ensure human rights in the workplace. The Policy applies to all our own operations, and to our supply chains, and is based on the ETI base code.

Supplier Code of Conduct

Our Supplier Code of Conduct was created in early 2021. The Supplier Code of Conduct sets out LDH's expectations of our suppliers, labour providers, service providers, contractors, and sub-contractors (collectively referred to as "suppliers") with respect to social and environmental practices. Suppliers are responsible for ensuring that this Code of Conduct and all relevant laws and regulations are complied with in their business and in their supply chains. Where the requirements of this Supplier Code of Conduct set a higher standard than is required by local laws and regulations, suppliers must align with the requirements of this Supplier Code of Conduct. We expect our suppliers to communicate the principles of this Code to workers and suppliers in their supply chain. This document is reviewed as part of an annual LDH document review to ensure it continues to be relevant.

Supply Chain Mapping

We recognise that modern slavery risks exist in our supply chains, and we have therefore taken practical steps to identify and prioritise addressing these risks. In early 2021, we further enhanced our responsible sourcing strategy by creating a new supply chain mapping template and distributing this to our supplier base. Our new mapping template collects more detailed information at farm and vessel level, enabling us to look at areas of potential risk beyond our tier 1 suppliers.

Risk Assessments

Each year all of our tier 1 suppliers are risk assessed against LDH's responsible sourcing risk assessment framework. In 2021, our risk assessment methodology was updated and includes information from SMETA audit reports, Sedex SAQs, Sedex inherent risk scores, as well information on the capacity and capability of the site to manage ethical issues. Each supplier that we work with is scored against these criteria and the outcome of the assessment is a better understanding of the modern slavery and human rights risks by supplier. This risk rating helps to prioritise and inform annual supplier action plans, which are developed in dialogue with suppliers.

Social Audits

SMETA (Sedex Members Ethical Trade Audit) audits are conducted at sites by third party auditors on a risk basis as determined by customer policy. Audits provide verified visibility of working conditions and insight into worker feedback. The SMETA audit reports on Sedex provide a record of compliance against the Ethical Trading Initiative's (ETI) Base Code. Compliance to the ETI Base Code is widely regarded as the most rigorous benchmark at factory level of best practice for working conditions, verifying labour agencies, recruitment fees, and grievance channels. In addition, an increasing number of our supply chains are implementing Global G.A.P GRASP at farm level, assessing the risks associated with child labour and forced labour.

3. Performance Indicators and Targets

To date, LDH has primarily used Sedex to understand and monitor supplier ethical progress and performance through SAQs and SMETA audits. The latter give a full understanding of whether the supplier is compliant with national labour legislation, and the ETI Base Code. Building on that, we deploy our responsible sourcing assessment framework to evaluate supplier performance against known risks and indicators.

We recognise it is important to work with all of our suppliers, but we prioritise high risk sites for action plans, before moving onto medium risk sites. Sites should continue to improve as we continue to have detailed and targeted conversations with suppliers on forced labour risks and solutions.

Our targets for the next three years focus on moving all high and medium risk suppliers to medium or low risk, and to increase our visibility at lower tiers of the supply chain. We plan to achieve this progress through the action plans and continued close dialogue with, and monitoring of, supplier performance. In practical terms, we recognise the importance for workers in our supply chains to raise grievances, and this is actively monitored through our risk assessment process. We are working with suppliers to improve these feedback and dialogue mechanisms.

Suppliers that fail to improve in accordance with their action plan are required to take immediate corrective action. LDH provides increased support and assistance where necessary to help build capacity and capability.

4. Training and Capacity Building

We are committed to raising awareness about human rights risks, including modern slavery, across our business and our supply chains. In 2018, a training programme for relevant staff was developed to help them to understand and identify modern slavery risks. This programme was aimed at increasing capabilities for detecting modern slavery during technical supplier audits, which complements visibility provided by SMETA audits. In addition, modern slavery training was conducted at Director level in 2018, with the participation of 80% of relevant staff. We have invested in Stronger Together training with a member of the Responsible Sourcing team attending.

Our staff training demonstrates a pro-active approach to addressing these complex ethical issues. To support this further we are evolving and strengthening our approach to provide a greater understanding of the issues surrounding modern slavery from the source of the product and throughout the supply chain. This will enable us to advance the development of skills, processes and resources within our organisation. Further training and capacity building is being planned for relevant staff across LDH.

5. Collaboration and Engagement

LDH recognises that there are entrenched, systemic socio-economic realities that negatively influence worker and stakeholder rights. We also acknowledge that addressing the source of modern slavery and human trafficking is often beyond the leverage of any single buyer or supplier. Therefore, LDH are members of FNET and contribute to a number of working groups. We are also a member of the ETI Italian Agriculture working group and various other category specific groups developed to advocate for positive change in complex and distant supply chains, where direct influence is not always possible.

Statement Approval

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes LDH (La Doria) Ltd's slavery and human trafficking statement for the financial year ending 31 December 2021. This statement has been considered and approved by LDH's management body on 9th June 2022.

Signed by Barry Fine, CEO





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