



## **Modern Slavery and Human Trafficking Statement**

### **Organisational structure and supply chains**

Michael I Holdsworth Limited (trading as Holdsworth Foods) are delivered wholesalers of frozen, chilled and ambient pre-packed foods. We operate from 10 depots in Derbyshire, Yorkshire, Lincolnshire, Bedfordshire, Worcestershire, Powys, Essex & Dorset.

Our suppliers are some of the largest UK and EU based food manufacturers who are able to meet our demand as a large, multi-site wholesale distributor. Example suppliers include Unilever, McCain Foods and Nestle.

### **Our policies in relation to slavery and human trafficking**

This statement explicitly addresses our position in relation to modern slavery and human trafficking; however it has links to other internal policies and procedures that ensure we are conducting business in an ethical and transparent manner. These include a specific modern slavery awareness and reporting policy which is made available to all staff in their handbook. Holdsworth have a zero-tolerance stance to slavery and human trafficking within our own organisation and that of our suppliers.

### **Due diligence processes & risk assessment/management**

Holdsworth operates a supplier approval process as part of our quality management system. We conduct due diligence on all suppliers before allowing them to become an approved supplier, together with re-approval of current suppliers at a flexible timescale based on risk. This process has been updated to include a section relating to the provisions of the Modern Slavery Act. The Government National Minimum Wage Naming Scheme Rounds are also checked on an ongoing basis for supplier non-inclusion.

In addition to the above, as part of our contract with our suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business through relevant policies, right to work in the UK pre-employment checks and payment to employees of at least the National Minimum Wage / National Living Wage as appropriate

- International suppliers pay their employees any prevailing minimum wage applicable within their country of operation
- They operate a zero-tolerance approach to Modern Slavery within their own supply chain, including supplier due-diligence checks and mechanisms for reporting suspected instances of Modern Slavery & Human Trafficking
- Where required, produce a Modern Slavery Statement detailing the steps they have taken to ensure their business and supply chain are slavery free

The risk of Modern Slavery within our own business is low due to our business type, industry and legal compliance in our business processes.

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

Key performance indicators used include monitoring our internal recruitment and payroll systems to ensure legal compliance, supplier Modern Slavery Act compliance during the approval and re-approval processes and supplier non-inclusion on the Government National Minimum Wage Naming Scheme. Our goal is to maintain compliance with the Act and take action if an instance of modern slavery is brought to our attention.

#### **Management commitment, training and future steps**

Several senior Holdsworth staff members, including those involved in recruitment and the procurement of goods & services have undertaken training to understand Trafficking, Exploitation and Modern Slavery. The training examines different types of exploitation, how individuals become victim to abuse and what actions professionals should take to recognise victims and help them.

We believe that increasing staff awareness and understanding of modern slavery is perhaps the most valuable action on this subject that we can take as a company. We pledge to do this on an ongoing basis by way of briefings and notices, including details of how to identify and report concerns of instances of suspected modern slavery.

**This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and relates to the period 1<sup>st</sup> March 2022 to 28<sup>th</sup> February 2023. It was approved by the Board of Directors on 11<sup>th</sup> August 2023.**



Rupert Holdsworth  
Managing Director

**Friday 11<sup>th</sup> August 2023**