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## UK Modern Slavery and Human Trafficking Statement

At Creative Foods Europe Ltd we are committed to doing business in an ethical and sustainable way. We are alert to the risks of (modern) slavery and human trafficking and undertake all reasonably practicable steps to ensure that (modern) slavery and human trafficking are not present either in our business or in our supply chain. Creative Foods Europe Ltd will never knowingly enter into a business relationship with any company that has/is involved with human trafficking or slavery.

Here at Creative Foods Europe Ltd all our permanent members of staff have applied for their positions and have been recruited following our recruitment policy and procedure. Our temporary staff are employed on a temporary to permanent basis via an approved agency.

In response to the United Kingdom's (UK) Modern Slavery Act 2015 OSI highlights the steps taken in this respect:

### About OSI and its business

Creative Foods Europe Ltd is part of the OSI Group and consists of the following subsidiary originations, Atlantic Foods, Calder Foods, Oasis Foods, Oliver James Foods and Proper Pies. OSI was founded in 1909 in Chicago as a privately-owned meat company. In 1955 OSI started to supply beef patties to quick service restaurants. OSI is today one of the world's biggest global supplier for renown brands from the areas of quick service restaurants, retail and food service. OSI has a worldwide global network of top-level food companies and around 20,000 employees work in more than 60 processing facilities in 16 countries.


### Auditing and Monitoring

This statement is clearly communicated at all levels of our business and forms part of our base level induction training program. Through regular internal audits we at Creative Foods Europe Ltd assess how the business is performing and if/ when necessary take the correct action to protect the wellbeing of our Creative Foods Europe Ltd family.

We monitor the risks of human trafficking and slavery by building relationships and achieving a more resilient supply chain to help reduce these. In turn, helping to improve quality and productivity.

Our aim is to enhance our brands integrity by gaining a deeper understanding of our and our supply chains deeper issues, which in-turn will strengthen our approach to ethical trading.

We are audited via external auditing bodies on a regular basis. Our procurement team visit our supply chain to ensure that they are compliant and hold an accredited certification (if applicable).

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We will actively encourage our suppliers to become members of SEDEX or similar ethical organisations and to participate in on-line business assessments, as well as agreeing to and permitting independent third-party site audits of employee working conditions and contracts. These reports will be uploaded and available for our customers to review.

### **OSI Global Business Standards**

The Global Business Standards (GBS) detail how to meet OSI's expectations to do business with integrity and how important it is to always act in accordance with the Company Policies and the law. It is an essential function of the job of our employees to understand and follow the GBS. Therefore, our employees need to complete the training on the Global Business Standards at least once per year. Furthermore, everyone has the responsibility to report immediately to his supervisor or Zone Manager if he knows or suspects that one of our business partners or employees is violating our guidelines, human rights laws or labor laws.

It is one of our targets to uphold human rights in the communities where we live and work. Therefore, we constantly monitor all worldwide operations to prevent the use of labor under any form of indentured servitude, physical punishment or confinement. In addition, OSI prohibits the use of child labor in the operations. OSI also complies with all other applicable employment and labor laws in the states where OSI conducts business, including those that regulate working hours, workers' rights, wages and benefits.

### **OSI Supplier Code of Conduct**

We view our suppliers as important partners in fulfilling its commitment to conducting business with the highest integrity, because their actions can reflect upon us, impacting our business, reputation and goodwill with customers. Therefore, we set forth the guiding principles and standards that we expect our suppliers to adhere to throughout the course of business relationship in the OSI Supplier Code of Conduct and to hold their supply chain, including subcontractors and third-party labor agencies, to the same standards included in the OSI Supplier Code of Conduct.

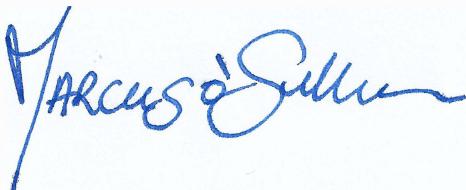
In particular we expect our suppliers to conduct their activities in a manner that respects human rights as set out in The United Nations Universal Declaration of Human Rights. It is set forth in the OSI Supplier Code of Conduct that suppliers shall not use any form of (modern) slave, forced, bonded, or indentured labor. They shall not engage in or support human trafficking or exploitation, or import goods tainted by slavery or human trafficking. They shall also not retain employees' government-issued identification, passports or work permits as a condition of employment.

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### **“Make it right” – Global employee hotline**

All employees of us and OSI have the right to a safe and ethical workplace where they are treated with respect and dignity. As part of the GBS and Compliance efforts the “Make it right” global hotline was activated. This hotline is available in over 40 languages, 24 hours a day / 365 days a year and is managed by a third-party provider that manages global hotlines for many of the Fortune 500 companies. It can be accessed by telephone or computer and is available to all OSI employees worldwide. The hotline is one possibility for all employees to make a report if they observe or learn of unethical behavior or unlawful conduct. Employees can choose to identify themselves or remain anonymous (if allowed by local law). The overall goal of OSI with the implementation of this hotline is to ensure accountability, transparency, responsibility and citizenship within the OSI group. We, OSI and its partners do not tolerate retaliation against anyone who makes a report.

This statement is also deemed to serve pursuant to section 54(1) of the United Kingdom’s (UK) Modern Slavery Act 2015 and has been approved by the Creative Foods Board of Directors. This statement will be reviewed annually and published within six months of Creative Foods Europe Ltd’s financial year end.



Marcus O’Sullivan  
CEO  
Creative Foods Europe Limited

Issued 14<sup>th</sup> April 2020

*(Statement prepared for the 2018 / 2019 financial year, ending 29<sup>th</sup> December 2019)*

