# **Modern Slavery Policy**

# **Policy Statement**

Snackline Direct is committed to ensuring that modern slavery, human trafficking, forced labour, and all forms of exploitation have no place within our organisation or supply chain. We adopt a zero-tolerance approach to slavery and human trafficking and are fully committed to acting ethically, with integrity, and in compliance with the Modern Slavery Act 2015 (UK), the Procurement Act 2023, and applicable international human rights standards.

We recognise that modern slavery is a complex and hidden crime that takes various forms, including slavery, servitude, forced and compulsory labour, and human trafficking. We are committed to implementing robust systems and controls to ensure modern slavery does not occur in any part of our business or our supply chains.

# **Purpose and Scope**

This policy applies to all individuals working for Snackline Direct Ltd or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, suppliers, consultants, and business partners.

#### **Our Commitment**

We will:

- Ensure transparency in our operations and supply chains.
- Conduct due diligence on suppliers to assess modern slavery risks.
- Implement policies and procedures to prevent modern slavery.
- Provide training to all staff.
- Foster open communication channels for reporting concerns.
- Engage in continuous improvement of our anti-slavery controls.

#### **Governance and Responsibilities**

Our Account Management Team is responsible for the day-to-day implementation of this policy, conducting risk assessments and supplier reviews.

All employees and contractors are responsible for reading, understanding, and complying with this policy, and reporting any concerns regarding modern slavery through appropriate channels.

## **Supplier Code of Conduct**

All suppliers are required to adhere to our Supplier Code of Conduct, which mandates:

- Transparent and fair pay and working conditions.
- The right to freedom of movement and freedom of association.
- Regular self-assessments and cooperation with audits.

# **Training and Awareness**

We will provide comprehensive Modern Slavery Awareness Training for:

All employees at induction and through annual refreshers.

Training modules will cover:

- Recognising signs of modern slavery.
- · Reporting mechanisms and whistleblowing procedures.
- Ethical procurement and supply chain due diligence.

#### **Audits and Compliance Reviews**

We will carry out:

Annual Supplier Reviews.

#### **Continuous Improvement**

Snackline Direct is committed to continuously improving its anti-slavery measures by:

Reviewing audit findings and supply chain to enhance policies.

# **Breach of Policy**

Any breach of this policy by employees will result in disciplinary action, which may include dismissal. Breaches by suppliers or subcontractors will be handled in accordance with contractual terms and may result in the termination of the business relationship.

### **Modern Slavery Risk Mitigation Plan**

 Maintain a Zero-Tolerance Policy towards modern slavery, enforced across all business operations and the supply chain.

#### **Supply Chain Risk Assessment**

 Evaluate suppliers based on country of origin, industry risks, and past compliance records.

# Supplier Engagement & Due Diligence

- Conduct Pre-Contract Due Diligence checks, including modern slavery in our Supplier Assessment forms.
- Require suppliers to demonstrate their own anti-slavery policies and practices.

# **Training & Awareness**

 Mandatory Modern Slavery Awareness Training for all employees involved in procurement and supply chain management.

# **Performance Monitoring & Metrics**

- Staff trained.
- Number of incidents reported and resolved.

# Review

This policy will be reviewed annually, or sooner if required, to ensure its effectiveness and alignment with evolving legal requirements and best practice