

## **Besana UK Limited Modern Slavery and Human Trafficking Statement**

### **Organisational Structure and Supply Chain**

Besana Group is an international nuts, seeds and dried fruit marketing and distribution company, sourcing products globally. We are family owned and work with suppliers world-wide.

Besana Group supply a broad range of customers in retail, food service and manufacturing and have global operations. Approximately 50% of the business is conducted in the UK. The head office and main production site of Besana Group is in Italy, we also have an office and production site in the UK.

Our supply base is extensive and has a global reach. We source from all five continents and many of the countries that we source from are considered as higher risk in terms of Modern Slavery. We work closely with our suppliers to mitigate these risks by taking a structured, aligned and sustainable approach to tackling Modern Slavery across the group.

### **Responsibility**

The Company Directors have overall responsibility for the Company's anti-slavery initiatives and ensuring that all those under their control comply with it.

### **Our Stance on Modern Slavery & Human Trafficking**

At Besana we are committed to operating our business in a transparent and responsible manner, striving to achieve the highest ethical standards and respect for human rights. We acknowledge our responsibility under The Modern Slavery Act 2015. The respect and protection of human rights is a core belief of Besana Group and we expect the businesses who work with us to follow these principles.

### **Our Due Diligence Processes**

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing policy** - The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

**Employee code of conduct** - The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

**Supplier/Procurement** - The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.

- ✓ We risk assess our suppliers through the relevant industry bodies, the Ethical Trading Initiative (ETI) base code principles and our internal supplier approval process. We seek to support our supplier base to achieve the required standards as a minimum. These standards include the protection of human rights and address areas that might give rise to enhanced risks of Modern Slavery.
- ✓ We are audited by our customers and are compliant with their Codes of Practice which include Ethical Standards and Policies.

- ✓ We are part of SEDEX and the Ethical Trading Initiative.

Agency workers policy - The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

#### **Awareness Raising and Training**

To ensure the highest level of understanding of the risks of modern slavery and human trafficking within our business and our supply chain, we provide training to relevant members of staff.

#### **Review**

This policy will be reviewed and published annually as required

A handwritten signature in black ink, appearing to read 'David McCormick', written in a cursive style.

David McCormick  
Sales Director

Besana UK Limited  
August 2021