

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

(2026 - 2027)

CONTENTS

Statement of Commitment	2
Our Organisation, Business and Supply Chains	3
Our Policies in Relation to Modern Slavery	4
Due Diligence Process	4
Risk Assessment and Risk Management	5
Measuring Effectiveness	5
Training and Capacity Building	6
Continuous Improvement	6
Director Approval	7

HARLECH FOODSERVICE LTD

Modern Slavery & Human Trafficking Statement 2026/27

Prepared in accordance with Section 54 of the Modern Slavery Act 2015

Document Control

Document Title	Modern Slavery & Human Trafficking Statement
Organisation	Harlech Foodservice Ltd
Version	1.0
Approved By	Managing Director
Approval Date	July 2026
Review Date	July 2027
Review Frequency	Annual

Statement of Commitment

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Harlech Foodservice Ltd has taken to prevent modern slavery and human trafficking in its business and supply chains.

Harlech Foodservice Ltd is committed to conducting business with honesty, integrity and respect for human rights.

We recognise that modern slavery, forced labour, servitude and human trafficking are serious crimes and have no place within our organisation or our supply chain.

As an independent foodservice wholesaler supplying customers throughout Wales and England, we recognise our responsibility to promote ethical business practices and to work with suppliers who share our commitment to responsible employment standards.

This statement explains the measures Harlech Foodservice Ltd has taken to identify, assess and reduce the risk of modern slavery within our business and supply chain during the reporting period.

Harlech Foodservice Ltd expects the same high standards from all organisations with which it conducts business and is committed to working collaboratively with suppliers to identify, assess and address modern slavery risks wherever they may arise.

1. Our Organisation, Business and Supply Chains

Harlech Foodservice Ltd is an independent, family-owned foodservice wholesaler established in 1972.

Operating from distribution centres in Llanystumdwy, Chester and Merthyr Tydfil, we supply frozen, chilled, ambient, grocery, butchery, fresh produce and non-food products throughout Wales, North West England and the West Midlands, with a promise to deliver quality, consistency, and great customer care.

Our customers include:

- NHS Wales & England
- Local Authorities
- Schools and Colleges
- Care Homes
- Hospitality
- Independent Caterers
- Public Sector Organisations

Harlech employs approximately 300 employees, all of whom are directly employed.

Our supply chain comprises UK manufacturers, food producers, distributors and importers together with selected international suppliers where products originate outside the United Kingdom.

We recognise that while the majority of our direct suppliers operate within the UK, certain internationally sourced products may present an increased risk of labour exploitation further within the supply chain.

Accordingly, Harlech seeks to work only with suppliers that demonstrate appropriate ethical trading standards and responsible employment practices.

2. Our Policies in Relation to Modern Slavery

Harlech Foodservice operates a number of policies which support our commitment to preventing modern slavery and protecting workers' rights.

These include:

- Modern Slavery Policy
- Whistleblowing Policy
- Diversity & Equality Policy
- Safeguarding Policy
- Responsible Purchasing Policy

These policies are reviewed periodically and communicated throughout the business.

Our Whistleblowing Policy enables employees to report concerns confidentially through Line Management, Human Resources or the Managing Director without fear of retaliation.

3. Due Diligence Processes

Harlech Foodservice operates supplier approval procedures as part of its Quality Management System.

Before suppliers are approved we undertake appropriate due diligence, which may include:

- Supplier questionnaires;
- Assessment of ethical trading arrangements;
- Review of food safety and quality systems;
- Confirmation of legal compliance;
- Contractual commitments to comply with applicable legislation;
- Assessment of responsible sourcing practices.

Approved suppliers are reviewed periodically to ensure expected standards continue to be maintained.

Where concerns arise, Harlech will investigate appropriately and reserves the right to suspend or terminate supplier relationships where serious ethical breaches are identified.

Within our own organisation, all employees are recruited in accordance with UK employment legislation and are subject to right-to-work checks before employment commences.

4. Risk Assessment and Risk Management

Harlech Foodservice considers the overall risk of modern slavery occurring within its directly employed workforce to be low.

This assessment reflects the fact that:

- Employees are recruited directly;
- Right-to-work checks are completed;
- Employment contracts are issued to all colleagues;
- Employment conditions comply with UK employment legislation;
- Staff are paid in accordance with National Minimum Wage and National Living Wage requirements.

We recognise that greater risks may exist further within complex food supply chains, particularly where products originate from overseas or involve labour-intensive agricultural or manufacturing activities.

To manage these risks Harlech:

- Maintains an approved supplier programme;
- Undertakes supplier due diligence before approval;
- Reviews supplier relationships periodically;
- Promotes ethical sourcing;
- Encourages suppliers to adopt responsible employment practices.

5. Measuring Effectiveness

Harlech Foodservice reviews the effectiveness of its approach through a range of measurable performance indicators.

These include:

- Completion of supplier due diligence prior to approval;
- Periodic review of approved suppliers;
- Completion of Modern Slavery awareness training for relevant employees;
- Monitoring concerns raised through the Whistleblowing Policy;
- Review of supplier non-conformances relating to ethical trading where identified;
- Annual review of this statement and associated policies.

These measures enable the Company to continually assess and strengthen its approach to preventing modern slavery.

6. Training and Capacity Building

Harlech believes employee awareness is one of the most effective ways to prevent modern slavery.

Training and awareness activities are provided for colleagues whose responsibilities include:

- Procurement;
- Recruitment;
- Supplier management;
- People management.

Training covers:

- Recognising indicators of modern slavery;
- Understanding labour exploitation;
- Responsibilities under the Modern Slavery Act 2015;
- Reporting concerns;
- Safeguarding vulnerable individuals.

Awareness is reinforced through policy communications and management briefings.

7. Continuous Improvement

Harlech Foodservice is committed to continually strengthening its approach to ethical trading.

During the forthcoming reporting period we will:

- Continue reviewing supplier due diligence procedures;
- Maintain employee awareness training;
- Review higher-risk sourcing categories where appropriate;
- Monitor developments in legislation and NHS procurement requirements;
- Review this statement annually.

Director Approval

This statement has been approved by the Managing Director of Harlech Foodservice Ltd and will be reviewed annually.

Signature:



Name:

MARK LAWTON

Date:

5/8/20

Managing Director

Harlech Foodservice Ltd