



## SeeWoo Foods Limited

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泗和行食品有限公司

## Modern Slavery Act Transparency Statement for SeeWoo Foods Limited

### OPENING STATEMENT FROM SENIOR MANAGEMENT

SeeWoo Foods Limited is dedicated to preventing modern slavery and human trafficking from taking place within its business and supply chain and we place the same expectation on our suppliers.

SeeWoo Foods Limited take a zero-tolerance approach to non-ethical practices and we are committed to acting professionally, fairly with integrity in all our business dealings and supply chain relations, wherever we operate, implementing and enforcing effective systems to uphold ethical standards and to combat modern slavery and human trafficking.

### POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

The following policies exist within our organisation which demonstrate our opposition to modern slavery

Right to Work Recruitment Guide  
Anti-Corruption Policy  
Anti-Bribery Policy  
Whistleblowing Policy

We ensure our suppliers are aware of our policies, and encourage them to adopt the same high standards.

### DUE DILIGENCE PROCESSES RELATING TO SLAVERY AND HUMAN TRAFFICKING

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we adopt the following due diligence procedure

Risk assessment based on Ethical Trading Questionnaires.

Our processes aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains
- Scrutinise any identified areas of risk within our business and supply chains
- Adopt a zero tolerance approach to slavery and human trafficking throughout the organisation and our supply chains.
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

### RISK AND COMPLIANCE

Our organisation regularly evaluates the nature and extent to which our business and our supply chains are exposed to the risk of modern slavery occurring. The following list of risk management activities and/or procedures demonstrates our commitment to compliance.

#### Supplier Approval Procedure

- Supplier Assessment Questionnaire
- Any third party audit certification (e.g. BRC, ISO 22000, HACCP etc)
- Depending on the level of risk associated with the product, a supplier site audit should be undertaken if third party certification cannot be provided.
- Depending on the customer requirement, other documentation such as TACCP, Ethical Trading Questionnaire etc.

We do not consider that we operate in high risk sectors because modern forms of slavery are not prevalent in the countries.

Where we have identified a potential risk, through the risk assessment, we prioritise any risks and take appropriate action to put remedial measures in place, such as improved internal purchasing practices or industry collaboration.

We ensure our suppliers are aware of our policies, and encourage them to adopt our high standards. We adopt a zero tolerance approach to slavery and human trafficking throughout the organisation which extends to our supply chains. Upon discovery of a breach of our policies relating to slavery and human trafficking we will terminate any relationship with the relevant supplier with immediate effect.

#### **SUCCESS AND EFFECTIVE NESS OF OUR PROCESSES**

##### Performance Indicators

- To be updated regularly
- Suppliers with repeated quality / delivery issues as documented should be remove/inactive on the approved supplier list

As part of the review performance indicators were used to assess how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains and recommendations were made regarding how to prevent slavery and human trafficking.

#### **TRAINING**

We ensure all employees are aware of the risks of modern slavery and human trafficking in our business and supply chains. Detailed below are examples of the training programmes we have in place to enable our employees to identify and report any potential breaches of the organisations anti-slavery and human trafficking policies.

#### **FURTHER ACTIONS, APPROVAL AND ENDORSEMENT**

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking. A memo will be sent out to remind all staff which the organisation intends to take to combat slavery and human trafficking.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes SeeWoo Foods limited slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2020.



Lucy Low  
Company Director)  
SeeWoo Foods Limited  
Date: 15<sup>th</sup> April 2019