

Year – 2023

Voluntary slavery and human trafficking statement

Huegli UK Ltd is making a voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015

Huegli UK Ltd is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.

Our organisational structure and operations

The Bell Food Group refers in its entirety to companies that are under the same management or are in a relationship of control or being controlled. The significant shareholdings that belong to the Bell Food Group are listed in the annual financial statements and the half-year reports of Bell Food Group AG, with its registered office in Basel (Switzerland), which can be found at <https://www.bellfoodgroup.com/en/investors/>.

The Bell Food Group is structured as follows:

Business unit Bell Switzerland

Business unit Bell International

- Division Bell Germany
- Division Bell West- & Eastern Europe
- Division Hubers (Austria)

Business unit Convenience

- Division Eisberg
- Division Hilcona
- Division Hügli with its subsidiary Hügli UK Ltd

The above list encompasses all business units which are in existence under the Bell Food Group, however Huegli UK Ltd is the only legal entity which has a demonstrable business presence in the UK. Huegli UK Ltd is a food service and own label ambient food manufacturer.

Huegli UK Ltd's annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act 2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

Our supply chains

Huegli UK Ltd is a leading manufacturer of food products. We supply food products to some of the UK's largest supermarket and foodservice companies. Huegli UK Ltd is committed to preventing slavery and human trafficking in all its activities and ensuring that its supply chains are free from slavery and human trafficking.

Huegli UK Ltd operates and manufactures in the UK and sources raw materials from a worldwide supply base.

Huegli UK Ltd plays a proactive role in the abolition of modern slavery and all its related practices and ensuring compliance with the Ethical Trading Initiative (ETI) Base Code, which aims to drive improvements in working conditions around the world, the Supplier Ethical Data Exchange (SEDEX), and promoting best practice within both our company and that of our suppliers. We have a rigorous supplier approval process, operated by our procurement and technical team.

We expect our suppliers to operate to the same ethical standards that we employ ourselves. Huegli UK Ltd is a member of SEDEX and we have been building SEDEX membership progressively across our supply base.

All suppliers are managed through the Huegli UK Ltd risk assessment, which includes an ethical risk assessment. We reserve the right to terminate our relationship with a supplier if issues of non-compliance with our policies are discovered and/or non-compliance is not addressed in a timely manner.

Huegli UK Ltd's policies and due diligence in relation to slavery and human trafficking

As part of our initiative to identify and mitigate risk we:

- do not tolerate forced labour (including human trafficking) or child labour in our operations or operations related to supply of any ingredient;
- will not knowingly use any organisation to source and supply workers using practices of forced labour or human trafficking for labour exploitation;
- encourage all our employees to report any concerns that raise suspicions related to human trafficking, both inside our organisation and through the Whistleblowing Policy;
- will confirm (through our own recruiting processes or through the recruiting processes of third-party agencies) that workers are not subject to any of the above practices and will report any evidence or suspicion of cases of hidden third-party labour exploitation to the Gangmaster and Labour Abuse Authority immediately;
- will conduct supplier risk assessments for all suppliers by collating and reviewing supplier's modern slavery and human traffic policies and procedures, regardless of their risk category. Where these assessments highlight a significant risk or breach of our requirements, the company will take appropriate action;
- creating an annual risk profile for each supplier;
- review the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- use SEDEX where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and

- invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Training

We will raise understanding and awareness of modern slavery and human trafficking with key staff. Additional training and engagement activities will be developed as appropriate as we continue to advance our human rights and modern slavery program.

Key Performance Indicators

Our procurement department has responsibility for monitoring suppliers in meeting the company's goal and updating our human rights strategy to foster good practice and enhanced controls across the business. Part of this effort includes establishing practical and meaningful key performance indicators to measure progress against our goals.

This voluntary slavery and human trafficking statement is made in connection with section 54(1) of the Modern Slavery Act 2015, for the financial year ending 31 December 2023. It was approved by the board on 3rd January 2023.



Christopher Hurt
Managing Director
HUEGLI UK LTD

Date: 3rd January 2023