

ATLANDTIS & CO LTD

Modern Slavery Statement

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Atlandtis place individuals at the heart of what we do. We are supremely compassionate, and that compassion is primarily self-imposed. We are honoured in being of service to our community and understand our responsibility to safeguard the highest possible standards. We serve with humility, recognising our obligation never to demean or diminish the value of others.

This is our first modern slavery statement and Atlandtis welcomes the transparency required under the Modern Slavery Act 2015. Awareness of instances of slavery, servitude, forced labour and human trafficking (collectively, modern slavery) is increasing. Modern slavery is a social, economic, and political challenge which requires collaboration from governments, society and both the public and private sectors to successfully address. We believe that the transparency encouraged by this reporting process supports such collaboration.

Atlandtis & Co Ltd is committed to prohibiting modern slavery from within our operations and supply chain. Our colleagues have been made aware of the importance we attach to integrity and doing the right thing. Colleagues are encouraged to report any incident of ethical concern they perceive, including allegations of forced or bonded labour, child labour or human trafficking. No country or industry can be considered immune to the risk of modern slavery and everyone, including responsible business, has an obligation to take steps to guard against such risks.

We will play a leadership role in promoting the dignity of people who make the products we sell. Those who work in our supply chain should be recruited and employed responsibly. Combating forced labour remains a key challenge throughout the world, and regardless of where it occurs in the global supply chain, Atlandtis is committed to working with industry groups, governments, NGOs and suppliers to help eliminate forced labour. Atlandtis is proud to be a responsible and ethical recruiter and we will work with others passionate about this important issue in order to create solutions.

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken in relation to section 54, part 6, by Atlandtis & Co Ltd to prevent modern slavery and human trafficking in its business and supply chains. It relates to our financial year ending 28th November 2023.

Assessing risk & due diligence

In order to mitigate and manage potential risks, we assess operations to support fair and responsible labour sourcing, including risks of modern slavery. We have policies and procedures on employment conduct and recruitment which are cascaded across all our operations. We also hold [Standards For Suppliers](#) which outline what is expected from those we purchase products from.

In relation to contractors providing us services, we have carried out additional due diligence to mitigate the associated modern slavery risk. We agree on a modern slavery policy and statement with our service providers, and our service providers must take steps to help ensure that all third-party agencies sign up and act in accordance with our shared policy and statement. We have also taken steps to introduce strong awareness regarding the importance of supporting responsible recruitment that helps address modern slavery risk. We will also implement an annual compliance review of each

agency with our service providers that includes a modern slavery review, which helps ensure that appropriate action can be quickly taken if issues are found.

Atlandtis sources from a diverse supply chain that is monitored as part of our responsible sourcing standards, which will assist to create an ethical and sustainable supply chain by working together with suppliers, auditing production facilities and participating in multi-stakeholder collaborative initiatives.

We will adopt a risk-based approach to auditing, using data compiled by the World Bank to determine the risk category of disclosed facilities based on indicators of good governance in the country where the facility is located. For suppliers seeking to produce goods for Atlandtis from facilities within our disclosure scope, factory details must be disclosed to enable risk assessment. Supplier sites in higher-risk countries will be required to undergo a prequalification audit in advance of us placing any order. Facilities in higher-risk countries may also undergo additional training or special programmes to reduce the risk of noncompliance in facilities.

Atlandtis suppliers will be subject to audits according to the same risk-based approach. All facilities within the scope of our responsible sourcing standards must be disclosed to us and available for an audit. Through this audit process we will work to identify risks and improve worker conditions in the supply chain including, amongst other issues, improper or unfair recruitment practices, which could be indicators of incidents of forced labour, human trafficking or modern slavery. Where issues are identified, we will investigate, and appropriate action will be taken, which may include cessation of business if appropriate.

To further supplement our risk assessment and due diligence, we will engage specialist third party agencies to help us assess the risk of modern slavery in global supply chains and review our initiatives. In situations of higher perceived risk, we will establish initiatives to help address the issue of modern slavery. These examples could include the following:

- Working with the supplier 2 Sisters Food Group, Ethical Trade Initiative (ETI) and the British Poultry Council to address the potential risks in the poultry industry;
- Collaboration with suppliers to help reduce risks of exploitation of seasonal labour;
- We will work with groups run by ETI to address modern slavery risks among refugees, migrant workers, women, men and children; and
- The Gangmasters and Labour Abuse Authority to raise awareness of the risks of modern slavery in our supply chains.

Training

All colleagues will receive training on the Statement of Ethics upon their induction into Atlandtis, and all senior Atlandtis colleagues (managers and above) must complete ethics training annually. In addition, we communicate regular reminders across the business to all colleagues in relation to our expectations on acting ethically. We will deliver awareness training to colleagues on responsible sourcing, including elements of modern slavery.

Changing the system

In addition to the potential risks identified in our supply chain, we will work with others to transform systems to promote a more responsible recruitment approach globally. We will collaborate with several organisations to drive this transformation, including:

- Collaborating with the consumer goods forums to create shared understanding through on forced labour;
- Working with groups for responsible recruitment, to increase the demand for responsibly recruited labour and supply of ethically sourced labour;
- Learning from experts, NGOs and other leaders to discover the best ways to identify and mitigate modern slavery risks in both our operations and supply chain, including participating in the BRC Ethical Labour Working Group and the BRC Responsible Sourcing Working Group; and
- Developing industry approaches to modern slavery by cultivating relationships with relevant stakeholders to implement projects across high-risk industries.

Reviewing progress

Supply Chains can change over time for many reasons, and the threat of modern slavery can continue to evolve and change. We intend to continue to monitor and review our controls that guard against the risk of modern slavery and we will have regard to the following metrics which will be shared and reported in next year's statement:

- Training of colleagues and managers within Atlandtis;
- Actions by third-party vendors to help mitigate modern slavery risks;
- Activities relating to increased transparency, monitoring and mitigation of higher risk areas of the supply chain; and
- Training for suppliers to increase awareness and identify forced labour risks.

This statement was approved by the Senior Leadership Team of Atlandtis & Co Ltd.



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Signed by Tysons Biscette, Director, May 2023.