



COOK Modern Slavery Statement 2022/23

Introduction

The driving purpose at the heart of COOK is to nourish people and planet. Home cooking is all about nourishment, not just for the body but for the soul, and COOK is a business built on strong, caring relationships between people. We are proud to be a certified B Corp, a process that has cemented our commitment to be a business that has a positive impact on people and the planet therefore making profits that we can be proud of. With caring for people firmly embedded in our DNA we are of course committed to doing what we can to reduce the likelihood of Modern Slavery, in any of its guises, occurring in any part of our business.

We recognise that as a food business, buying hundreds of ingredients from around the world, there is a regrettable but real risk of people being exploited within our extended operations. We are also aware that the number of people in the UK identified as victims of modern slavery has been rising year on year and we need to be vigilant and pro-active in our own operations. This statement sets out the steps taken in our financial year 2022/23 to prevent Modern Slavery and Human Trafficking across our business.

Our Structure and Supply Chain

We make and sell quality, hand-prepared frozen food. Our operations include 95 shops nationwide, around a third of which are franchises, freezers in over 900 like-minded retail partners, a warehouse, a home delivery hub, and three large kitchens. We are a vertically integrated family-owned business with over 1,600 employees doing a remarkable job across a diverse range of roles. Our founding statement in 1997 was to cook using the same ingredients and techniques you would use at home, so everything looks and tastes homemade. It's how we still do things today.

We regularly work with around 300 suppliers and service providers, building strong relationships with them based on trust and transparency is extremely important to us. We believe that progress to eradicate the scourge of Modern Slavery will be best achieved through collaboration.

Lead responsibility for our approach to Modern Slavery lies with our Technical and Sustainability Director, a member of our senior leadership team, who co-ordinates our strategy and ensures operational delivery across the business.

Our Policies

One of our core values is Be Part of the Family, this means that we look out for each other and look after each other. We have several policies in place outlining our approach to treating people fairly and with respect, and our commitment to responsible business practices. These are



published in the COOK Handbook, the home of our internal policies and rules which all our people receive when joining us.

This Handbook sets out our internal Code of Conduct, Disciplinary and Grievance Policies, Equal Opportunities Policy, and Whistle Blowing Policy. When combined these ensure that all our people understand what we consider appropriate behaviour and the processes to go through if they wish to report a grievance. As part of our commitment to openness and accountability our Whistle Blowing Policy outlines how people can raise concerns of harassment or exploitation, e.g. Modern Slavery, internally without fear of reprisal using a confidential phoneline.

Our Handbook also details how we follow legislation around entitlement to work in the UK. We take great care to ensure that our recruitment process is vigilant in ensuring that everyone employed by COOK is able to work with us legally and freely, requiring references and a copy of all employees' passport or equivalent standard documents to be taken.

In addition to our Handbook, all new starters receive a company information pack when starting their role at COOK. This pack includes a Modern Slavery Awareness and Guidance document to provide staff with information as to what modern slavery is, what the common signs to look out for are and how they can report any concerns.

Whilst most of the people working in our kitchens are COOK employees, we sometimes contract people to work temporarily through employment agencies. Like other businesses we work with we require these agencies to sign up to our Supplier Code of Conduct and we conduct announced audits to ensure that they are following the appropriate checks around entitlement to work. We conduct further reviews on our agency suppliers by including them in our Annual Supplier Risk Assessments and obtaining enhanced due diligence from them, such as proof of their GLAA licence.

Our Supply Chain

We recognize we have a responsibility to ensure that the people working in our supply chain are respected and treated fairly.

Our Supplier Code of Conduct sets out what suppliers can expect from a relationship with us, and what we expect from them as a supplier to our business. All suppliers, whether ingredients, products or services are required to sign up to the Code of Conduct as a condition of doing business with COOK. Suppliers are required to re-sign our Code every three years to ensure continuous compliance. Agreement with the Code is also expected from suppliers' own upstream supply chain.

The Supplier Code of Conduct is based on the Ethical Trading Initiative Base Code and includes sections on employee labour rights, working conditions and child labour. Our Code of Conduct specifically states that "all work shall be voluntary, and workers must be free to leave work or terminate their employment after reasonable notice", "employees must be



provided with wages and benefits that, as a minimum, comply with all national legal requirements” and “steps shall be taken to guard against modern slavery in all its forms”.

To ensure compliance with our Code of Conduct, we developed our Sustainability and Ethics Questionnaire (SEQ). The SEQ includes a Social section designed to interrogate whether supplier’s business practices align with those of the ETI Base Code, as well as asking suppliers to provide details on how their business guards against modern slavery, including what processes they have in place for reporting instances of modern slavery and how risks of modern slavery are managed further up the supply chain. Suppliers found to be non-compliant with the SEQ face remediate action or are delisted.

In Y23/24, we are focusing our attention on the social performance of our Priority Ingredient suppliers as part of our Sourced the Right Way project. At COOK we are committed to using our business as a force for good and are working towards a vision of food grown, made, and enjoyed in a way that nourishes people and planet. Working with likeminded suppliers who share this vision and are dedicated to continuous improvement is paramount. This project aims to ensure we are working with suppliers who demonstrate progress towards improving their social and environmental impact, of which matters of modern slavery and human rights play an important part.

Due Diligence & Risk Assessment

Our Supplier Risk Assessment includes a review of a supplier’s social performance. Data for the risk assessment is gained from the SEQ. We share risk assessment scores with suppliers and provide opportunities for them to discuss their score, enabling us to work collaboratively to drive improvements.

Where suppliers are identified as high risk, we will engage them in areas of concern until sufficient improvements have been made. Where insufficient progress is made, the process to cease working with the supplier will begin.

Our risk assessment feeds directly into our Supplier Action Schedule which determines the frequency for supplier site visits. We include specific modern slavery parameters in our visit reporting based on criteria from Stronger Together, to ensure we have our ‘ears to the ground’ when carrying out audits.

We are members of Sedex (Supplier Ethical Data Exchange), and proactively use their platform to interrogate aspects of our current and potential new supplier’s due diligence concerning labour rights, health and safety, environmental performance and business ethics. We closely monitor and report on any non- conformances raised and take action should markers of forced labour be found; in Y22/23 no markers of forced labour were identified. 57% of our ingredient and packaging suppliers are currently Sedex members. Sedex performance is discussed at each of our Quarterly Supplier Meetings.



Training

Relevant team leaders from our Kitchen production sites, logistics sites and key office teams (Human Resources, Technical, Sustainability and Procurement) have received dedicated modern slavery training. The training was delivered by Stronger Together and aimed to deepen knowledge of modern slavery in a manufacturing setting, specifically how to spot, prevent and report it.

As we strive to achieve our purpose of nourishing people and planet we maintain that a business is the most potent instrument of positive change in the world today. As a responsible business we seek to create shared and durable prosperity for all, rather than simply maximise returns for shareholders. We see taking proactive and positive steps over the next year and beyond to reduce the risk of any instances of Modern Slavery within our operations as an important part of this.

This statement covers the period of April 2022 to March 2023 and has been approved by the COOK Board.

Edward Perry
Founder & Co-CEO

Rosie Brown
Co-CEO