



COOK Modern Slavery Statement 2017/18

Introduction

The driving purpose at the heart of COOK is Nourishing Relationships. 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.

Recent evidence suggests that Modern Slavery is a growing issue both globally and closer to home with the National Crime Agency reporting a 35% annual rise in the number of suspected slavery victims found in the UK in 2017 compared to 2016. 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. This statement sets out the steps taken in our financial year 2017/18 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 87 shops nationwide, around a third of which are franchises, freezers in over 500 like-minded retail partners, a warehouse, a home delivery hub, and two large kitchens. We are a vertically integrated family-owned business with 1,000 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 work with more than 450 suppliers, most of whom supply us with food ingredients, gravitating towards smaller to medium-sized suppliers with whom we can develop personal relationships. Building strong relationships with our suppliers based on trust and transparency is extremely important to us and we believe that progress to eradicate the scourge of Modern Slavery will be best achieved working together.

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

Our Policies

Internal

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, which all our people receive when joining us, is the home of our internal policies and rules.

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.

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 in the last year we conducted announced audits to ensure that they are following the appropriate checks around entitlement to work.

Our Supply Chain

Part of COOK's purpose is to Nourish Relationships with food and where it comes from. This includes a recognition of our 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 this Code of Conduct as a condition of doing business with COOK, compliance with the code is also expected from their own upstream suppliers.

The Supplier Code of Conduct, which is based on the Ethical Trading Initiative Base Code, specifically states that "all work shall be voluntary, and workers must be free to leave work or terminate their employment after reasonable notice" and "employees must be provided with wages and benefits that, as a minimum, comply with all national legal requirements". The Code also includes a commitment to "ensuring that no part of its supply chain, or those that come into contact with it, benefit from activities connected with modern slavery".

Due Diligence & Risk Assessment

The process of signing our Supplier Code of Conduct includes suppliers completing a self-assessment questionnaire. Suppliers must complete this questionnaire every 36 months and verify that all information provided is accurate and up to date on an annual basis. This self-assessment questionnaire asks all suppliers to provide details of how their business guards against modern slavery, the control measures they have in place, and any plans they have for improvements in this area. Responses to this question are considered as part of our supplier risk assessment process. Where suppliers are identified as high risk, we will engage with them in the 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 also feeds directly into our Supplier Action Schedule which is in place to determine the timelines for visits to suppliers' facilities. As well as perceived risk, supplier type and spend are used to determine the frequency of visits we make.

We have recently become a member of Sedex, increasing our visibility of our supply chains and empowering us to better identify, understand, and act upon ethical risks that may exist. At present we do not require our

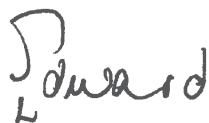
suppliers to be Sedex members but we are in the process of deciding on an appropriate level of engagement with Sedex or a similar responsible sourcing platform required to be one of our suppliers.

Training

Relevant members of our Technical and Social Impact teams have received training and/or attended conferences relating to ethical trade and modern slavery. Plans to roll out training relating to Modern Slavery more widely across the business are being formulated.

As we strive to Nourish Relationships between business and society 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 2017 to March 2018 and has been approved by the COOK Board.



Edward Perry
Co-Founder and CEO