

## **MODERN SLAVERY POLICY STATEMENT for 2022**

**Anti-Slavery and Human Trafficking statement for the financial year ending January 31<sup>st</sup>**



### **Opening statement**

Atlante makes this statement on behalf of itself pursuant to the UK Section 54(9) of the Modern Slavery Act 2015.

#### **Respecting human rights is a fundamental part of our effort to conduct business sustainably.**

Modern slavery is the recruitment, movement, hiding or receiving of children, women or men through the use of force, pressure, abuse of vulnerability, deception, or other means for the purpose of exploitation. Individuals may be trafficked for a number of reasons; including sexual exploitation, forced labour, domestic servitude, and organ harvesting.

At [Atlante](#), we are committed to doing business ethically, transparently, and in compliance with all applicable laws. In accordance with Atlante "[Corporate Policy for Ethical Employment](#)", we always act following our Ethical Principles of fairness, honesty, and integrity. We realise that the rise in human trafficking, forced labour, and abusive child labour is a risk; and our commitment and steps taken to mitigate these violations in our business and supply chain are integrated into every aspect of our business.

Respect for human rights is practised the same way we practice our other Values, and we seek to work only with buyers, suppliers, and partners equally committed to doing the right thing and who demonstrate and maintain high ethical standards. We don't tolerate modern slavery, human trafficking, or any other abuse of human rights within our business nor that of our supply chains.

This statement is published in accordance with the Modern Slavery Act 2015, and covers all of Atlante's trading operations, not only those taking place in the UK. It describes Atlante and its supply chains, and what we did in 2022 to help combat modern slavery and human trafficking across our business and our supply chain. It also explains the rules or guidelines for our organisation and employees to follow in order to achieve compliance and how we intend to continue to review them while strengthening our programme.

*This statement is reviewed annually in December – at the end of the financial year.*

## About Atlante

Atlante is a leading international global sourcing platform, specialised in food and non-food products.

We collaborate closely with our partners to interpret market trends and create winning products that satisfy our customer needs.

Our solutions are inspired by each customer's goals and habits. That's why even if our core business is private label, which makes up 70,3% of our turnover, we also work with tertiary brands (18,7%) and international brands (11%). Thanks to our experience in the Italian and foreign food retail sector, we provide a complete start to finish project management service.

We employ 85 staff, up 5 versus 2021.



Our in-depth knowledge of markets and products allows us to handle a product's every detail, from creation to sustainable and ethical product fruition and distribution. We are also able to support our customers with market launch, including in-store communication or through our unique digital marketing strategies.

This complete Project Management service allows us to be the ideal partner for the development of successful turnkey products – that are ethical and sustainable.

## Our Vision and Mission are underpinned by our Values

Our Vision is to be a Company where Colleagues love work for and business partners choose to work with, building win-win relationships based on trust and respect.

Our Mission is to be a strategic, reliable, and competitive global sourcing partner for food and non-food products developing tailor-made solutions from start to finish nurturing an environment that is diverse and inclusive supporting our colleagues to grow to be the best they can be.

Our Vision and Mission are strongly anchored on the values we believe in: passion, integrity, quality, innovation, responsibility and respect. These are the values and characteristics that have enabled us to win and maintain the trust of the many stakeholders who see us as the ideal partner to create national and international food and textile products.

## Our Supply Chains

Our supply chain is quite extensive and complex. It currently consists of around 180 Tier 1 suppliers in more than 15 countries. The complexity lies in the fact the majority of our suppliers buy from several other sub-suppliers that source goods and services from a variety of companies located in different countries, further extending the influence and impact of Atlante's business worldwide. For our UK retail customers, we source from 24 production sites, corresponding to 21 different suppliers, all Italian.

Atlante's contracts with suppliers include clauses relating to termination in case of breach of any legislation pertaining to modern slavery, and we continuously gain more visibility into our indirect suppliers. This is a contractual obligation of our direct suppliers. We continue to work with them to identify our indirect supply chain

and collaboratively look at how we can strengthen our assessment of our indirect suppliers in terms of due diligence processes and risk assessments.

In addition to this commitment, Atlante is also dedicated to environmental sustainability. We introduced two days of homeworking to let our people to better organise their private life; this also reduces the carbon emission linked to our activity. Furthermore, in 2022 we started collecting environmental data from our supply base by asking them to annually complete a questionnaire that will permit us to monitor their sustainability performance and environmental fingerprint. Finally, we started conversing on environmental KPI's to be introduced to measure the environmental footprint of our logistic operations.



## Our Sustainability Plan

At Atlante we believe that a sustainable & food secure world for all is possible. To achieve this, we need to work towards more efficient, inclusive, resilient & sustainable agri-Food systems to future-proof our planet.

Our Sustainability plan is based on 3 pillars:

1. People: committed to diversity, equality and inclusion
2. Product: committed to sustainable, ethical sourcing
3. Planet: committed to diversity, equality and inclusion



## Atlante Policies

At Atlante, we know that modern slavery exists in every country in which we operate. We aim to maintain trust and integrity with everyone who works with us, including: our employees, customers, business partners, suppliers, and all workers in our supply chain. Instilled with motivation and operating in a highly competitive industry - with expertise in developing tailor-made solutions from start to finish - we conduct our business ethically and with integrity. We believe this is the reason why a customer, a partner, a supplier chooses to do business with, and why great people come to work at Atlante.

Atlante started its journey on ethical trade in 2015 when it became a Sedex member.

In 2020, we embarked on a robust global programme, our Ethics & Compliance programme, which is led by a global Ethical Manager and is designed to communicate the ethical and legal standards that govern our business conduct. The cornerstone of our Ethics & Compliance programme is the Atlante “Corporate Policy for Ethical Employment”. It sets the basic principles we must follow to uphold our company’s ethical business

culture. This Policy is a global document, and all our employees are familiar with it and are required to abide by it.

Atlante's [Policy](#) is built on the Fundamental Conventions of the International Labour Organization (ILO) and the Ethical Trade Initiative (ETI) Base Code. It publicly states our requirements for good work practices and describes our commitment on human rights, including privacy; diversity and inclusion; environmental sustainability; health and safety; humane workplace; fair wages, benefits. It also includes our prohibition on the use of forced or involuntary labour, including human trafficking, in the supply chain. Atlante's Policy, first published in 2020, set out our commitment to meet our responsibility to respect human rights and how this mind-set is integrated into our ethics and compliance programme.

We aim to have a workforce that reflects diversity where all persons receive equal treatment. In Atlante there is no space for intimidation, harassment, coercion, violence, or any abuse of human rights, and we reiterate that all human rights and fundamental freedoms are universal.

In addition, we require our contractors and suppliers to comply with all applicable laws and regulations, and with our "Corporate Policy for Ethical Employment"; which prohibits the use of any form of child labour or forced labour, in our supply chain. It also requires that suppliers uphold Atlante's commitment to freedom of association.

The Policy clearly states the measures we reserve the right to undertake in order for us to be satisfied that our suppliers, contractors, and any other parties involved in our business activities and supply chains operate in full compliance with applicable labour, occupational safety and human rights regulations and with our Ethics Policy.

Suppliers, contractors, and all parties directly or indirectly affected by our activities must be guided by increasingly high standards of work and safety, demonstrating an aptitude for excellence not only in good manufacturing practices, but also in the careful management of our human resources, to whom we depend on for successes.

If we find or become aware of violations and/or non-compliance with our ethical Policy, or even just practices that could jeopardise compliance, the involved suppliers will be required to stop such practices and remedy such situations as soon as possible and, in any case, within the time agreed with us.

We continue to offer technical support and know-how to our suppliers and/or contractors and/or other parties involved in our business, where such critical issues have been identified, but we also reserve the right to temporarily or permanently suspend the supplies and/or services received by them should repeated violations be identified.

Within Atlante, we continue to review our policies and standards on an annual basis.

## **Atlante and Modern Slavery**

Modern Slavery continues to have an untold human cost across the globe.

Through a variety of internal programmes, we seek to mitigate this very real issue both within our own operations and among our suppliers.

## **Atlante People**

We aspire to use the power of our creativity and voice to combat modern slavery. We maintain a dedicated HR team responsible for hiring our workers who ensure proper process is followed. Our recruitment procedures foresee the support of an external recruitment firm accredited to the Italian Ministry of Labor. Vacancies are published on both our company's website and our LinkedIn page. First screening takes place based on information included in the resumes received directly from applicants and/or handed through by the recruitment firm. Only CVs matching the required job descriptions are selected for follow-up interview. Gender, race, religion, and political beliefs are not involved in the profile evaluation.

Our procedures ensure that employees and workers can easily access our "Corporate Policy for Ethical Employment" for guidance on specific ethical concerns. We foster and encourage an open two-way dialogue with our employees where speaking up is respected and protected.

We aim to make working at Atlante the best experience possible. We set out our expectations of suppliers thanks to our Policy. We also make it clear to employees who violate the “Corporate Policy for Ethical Employment” or the law, that they may face disciplinary actions, up to and including termination.

Once-weekly all the Atlante workforce meet online for a two-hour conference when each department presents all the previous week’s business achievements, criticalities, and work-in-progress. These weekly conferences provide the opportunity for our HR Manager to update staff on new recruitments, training / professional developments, company initiatives towards the workforce, (including, but not limited to social and sports events), health and safety concerns and mitigating actions thereof, any other potential causes of workforce concern and the company’s actions to address them.

In 2022, we started an internal project to support diversity, equality and inclusion in our Company. The project aims to:

- Reduce the gender gap (man /woman) in leadership roles via training, working hours flexibility, by giving both internal and external visibility to our women’s work, providing induction training for Maternity returners.
- Promote integration and inclusion of multiple cultures (more than 11 nationalities are represented in the Company), also reducing the generation gap via a mentoring program to transfer knowledge from senior to junior colleagues.
- Pay greater attention to people with disabilities. there are among us people with disabilities who with their work are making a fundamental contribution to our success.

## **Monitoring Compliance and Whistle-blower Hotline**

Atlante promotes a culture of honest communication and mutual respect. All employees are encouraged to talk to Human Resources or their managers if they have any concerns.

Furthermore, twice per year - usually in June and December - a grievance mailbox is installed in a Company's area where workers can share complaints and suggestions without being seen. The system is advertised by an e-mail sent in advance by the HR Manager and remains in place for a fixed amount of time. Complaints and recommendations are then picked up, reviewed and evaluated by the HR Manager and Atlante's CEO. Public feedback to those complaints and instances is given back during the so-called “global meeting”, a general meeting taking place twice per year, at which all the workforce is invited to attend. At the same time, corrective actions and measures aimed to respond to the arisen suggestions are announced and explained. When complaints are not actioned, reasons are provided along with the invite to those interested to further discuss the issue directly with the HR Manager, if needed. The global meeting, of course, takes place within working hours. The number of complaints and suggestions that we have received in the last year means to us that the workforce feels they can speak up, express their concerns, and be heard.

Atlante also has a General Services Manager who is constantly focused on guaranteeing a hygienic and comfortable working environment, regular maintenance of equipment and company vehicles. Among the responsibilities of the General Services Manager is also the management of complaints, criticalities and issues flagged by the workforce.

In addition to the General Services Manager, Atlante also has a Health and Safety Representative, freely elected by its workforce and serving as a channel for reporting any concerns and / or risks or non-controlled hazard in the working place. The Health and Safety Representative carries out regular twice-yearly checks of the company premises and fire-prevention systems and reports his findings to the General Services Manager and the HR Manager.

Regardless of the types of goods and services suppliers sell to us and regardless of where they operate, Atlante regularly monitors its suppliers and explicitly requires due diligence for labour practices (such as discrimination against women in the workplace and workplace violence), human rights (including no child labour and forced labour), and social impacts (such as anti-bribery and corruption), workplace health & safety, as well as other sustainability issues. Atlante evaluates and investigates the nature and the extent of any identified areas of risk to determine specific steps to combat modern slavery and human trafficking in our supply chains. The Atlante Ethical Manager is trained to recognize and identify ethical dilemmas and inspect direct suppliers and high-risk sub-suppliers. In addition, random ethical audits involve interviews with a sample of suppliers' workers and /or their representatives. He takes part in working groups and roundtables organised

by Ethical Trade Initiative with the aim of sharing tools to address and mitigate the ethical risks inherent in the supply chain and to keep constantly up to date on all new risks and challenges emerging worldwide. In its quality as a Sedex member, Atlante's Ethical Manager has access to the Sedex Radar's database, where further information on sector- and country-specific risks can be found.

Furthermore, all Atlante's product technologists are trained on the ethical critical control points against which suppliers' production sites should be checked when performing technical visits. Reports from the visits are documented and logged on the Company's archive. Moreover, suppliers used for supplying the UK market must meet the following requirements:

1. Be Sedex members and complete Sedex SAQ and review/update it at least once a year.
2. Be third-party audited (semi-announced audit) against the SMETA standard. Audit frequency depends on the risk rating attributed to them by the Sedex Radar.
3. Close non-conformities within the time limits and in the ways prescribed by the auditors.
4. Have a whistle-blowing system in place to record and address grievances.

Unannounced or semi announced audits could be carried out on high-risk tier 2 suppliers, and beyond tier 2 (for example, tomato farmers supplying raw material for our canned tomatoes). These high-risk audits can also be carried out enlisting the support of external consultancy firms (e.g.: ESC International).

## INTERNATIONAL STANDARDS



### Training

We invest in educating our staff on the risks of modern slavery and human trafficking. All Atlante staff received comprehensive training on the Modern Slavery Act. The training focused on the countries, industries, and work environments where modern slavery risks are known to be high, as well as the legislations that cover it.

All Atlante employees will be required to complete "Corporate Policy for Ethical Employment" training upon hiring. Further, all Atlante's employees will be required to undergo annual training on Slavery Prevention. This will consist of comprehensive training on all aspects of Atlante's Policy, prohibition of slavery and forced labour, discrimination, harassment, and abuse of human rights. We aim to achieve an annual completion rate of approximately 99% of total workforce.

In 2022 all Atlante's PTs tasked with auditing suppliers' production sites underwent two training cycles focusing on:

1. Regulations and audit-verified evidence on working hours, temporary work contracts and legal management of contractors and sub-contractors,
2. Services offered by the "Helpdesk anticaporalato" national whistleblowing system, (sponsored by the Italian Government with the aim to curb the gangmaster phenomenon). This training was administered with the aim to enable our PTs to properly educate the audited sites' workforce on the existence, function and use of this protection tool.

The aforementioned training cycles were provided, respectively, by two primary labour consulting firms and by the *Helpdesk anticaporalato* staff themselves.

To combat any risks, the Atlante Academy offered a [seminar](#) to many suppliers in 2021, called “Working hours: limits, costs, opportunities”. The training outlined the conditions for engagement, including due diligence, and the importance of ethical sourcing practices. The training was focused on working hours and also included tangible legal and ethical guidance for labour exploitation prevention.

In addition to the above, in 2022 we actively took part in a training activity aimed at increasing awareness of the importance of adopting a self-assessment system in the management of every company’s workforce and ethical compliance. This training activity was jointly developed and administered with ETI and it was addressed to members of ETI’s Italian Working Group and their Tier-1 and Tier-2 suppliers directly involved in agricultural activities or in the processing of agricultural produce. Atlante invited its suppliers of Canned Tomatoes and Sauces, due to these industries being rated as high-risk.

## Due Diligence

We set very clear expectations so that all our suppliers know that they have to be:

- (i) in compliance with the requirements of the United Kingdom Modern Slavery Act,
- (ii) transparent, accountable, and auditable, and
- (iii) free from ethical ambiguities.

Before including a new direct supplier to our list, we collect initial data about it and then assess its risk and assign a risk classification. Initial minimum ethical requirements are well defined and clear to our Procurement department. Depending on the information gathered (i.e. policies and certification on labour standards), the supplier can or cannot be added to Atlante’s suppliers’ list. We also include an assessment visit to the production site(s) and the administrative offices of any potential supplier for the UK market. We recognise that the more detail we can give to potential suppliers about our ethical requests, the easier it will be for them to provide information about them. This is why we are putting together a list of ethical requirements to share with any potential supplier.

Once on-board, we ask all our direct suppliers to implement and maintain ethical standards that equal Atlante’s policies and business requirements. Further, as part of our contractual agreements with suppliers, we require that suppliers agree to abide by our “Corporate Policy for Ethical Employment”, comply with all applicable laws, and specifically commit to passing down these requirements to any subcontractors, whose compliance is subject to audit.

In general, our due diligence process is designed to:

- Develop a deeper understanding of areas of the top potential risk in our business and in our supply chain;
- Monitor potential risk areas in our business and supply chains;
- Prepare our supply chains for any of those risks;
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

As we see the tomato growing sector as high-risk, we:

- Require all our tomato-producing and processing partners to be compliant with Sedex’s Key Performance Indicators (KPIs). This, combined with audits that always capture workers’ voice, helps us to ensure workers’ well-being.
- 100% supply chain mapping (SCM) of chosen manufacturers’ supply chain.
- 100% risk-assess chosen manufacturers’ supply chain.
- Our ethical policy must be adopted by our chosen processing partner(s), who must in their turn impose it on their supplier base. Even if suppliers beyond the first tier of our tomato supply chain are often small businesses, it is very important that they are knowledgeable of our policy.
- Selected manufacturers must join ethical roundtables/workgroups such as FNET, [Stronger Together, ETI, etc.](#)
- Selected manufacturers must have a grievance recording and reporting system and a whistleblowing facility in place.
- Manufacturers are required to have an Ethical Manager with a budget and the authority needed to enact all measures required to guarantee ethical compliance.

## Teamwork

To strengthen our due diligence process in the wake of the Modern Slavery Act, we have a team of people (the “Sustainability team”) from various functions across Atlante who focus on modern slavery. The Team is chaired by Atlante’s CEO, Natasha Linhart, and is a multi-disciplinary team, including one representative from each Company’s department (Quality, Commercial, H.R., Supply Chain, Marketing); for this reason, it has a diverse background and a global mind-set. The Ethical manager provides assurance over compliance with Atlante’s Ethics & Compliance programme through:

- (1) ethical audits conducted by independent 3<sup>rd</sup>-party auditing firms, (e.g.: ESC International), as well as qualified auditor members of the Atlante Ethical team;
- (2) accepting whistleblowing directly from workers in the supply chain;
- (3) staff training, and
- (4) supplier due diligence (I). The Atlante Ethical Team and a Third Party International Firm carry out announced, semi-announced, and unannounced audits across the manufacturers’ supply base on the basis of the results of their risk assessments.
- (5) supplier due diligence (II). The Atlante Ethical Manager and Product Technologists continuously liaise with suppliers and 3<sup>rd</sup>-party certification bodies in order to address and solve any major or critical non-conformities identified during Smeta/3<sup>rd</sup>-party audits within the timeframe and in the ways indicated by the auditors.

## Assessment of 2022

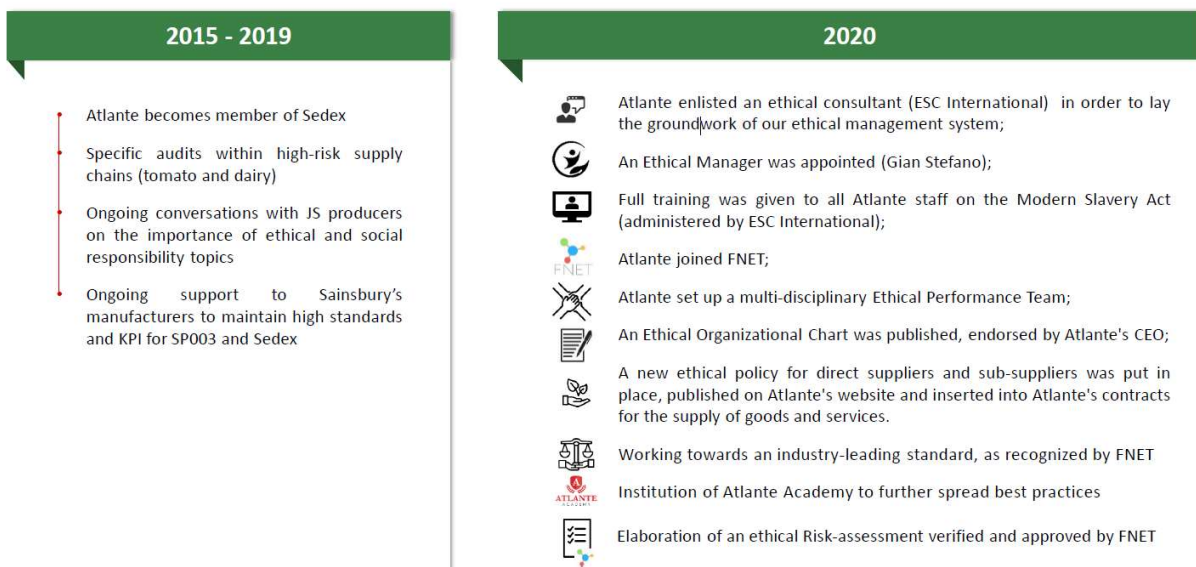
1. Also in 2022, all new suppliers were jointly assessed by the Ethical Manager, Purchasing Manager and Product Technologists in order to ensure compliance with Atlante’s Corporate Policy for Ethical Employment.
2. All suppliers involved in Atlante’s UK business were assessed and monitored on the basis of Sedex’s KPIs, and supported towards achieving conformity with these mandatory requirements:
  - a. Be Sedex members and complete Sedex SAQ and review/update it at least once a year.
  - b. Be third-party audited (semi-announced audit) against the SMETA standard. Audit frequency depends on the risk rating attributed to them by the Sedex Radar.
  - c. Close non-conformities within the time limits and in the ways prescribed by the auditors.
  - d. Have a whistle-blowing system in place to record and address grievances.
3. All suppliers involved in Atlante’s UK business and audited in 2022 for compliance with food-safety regulations and protocols were also assessed for compliance with the three critical ethical requirement areas:
  - a. Working hours,
  - b. Health & Safety,
  - c. Agency workers’/labour providers’ management
4. All suppliers are required to adhere to our Corporate Policy for Ethical Employment.
5. We developed a self-assessment ethical questionnaire with the support of ESC International, to serve as a pre-assessment tool for suppliers operating in high-risk sectors and/or regions and not members of Sedex. This new SAQ was tested for the assessment of a production site in China and it will be used more extensively in 2023 to support our risk analysis of non-UK suppliers.
6. We regularly shared internal and external (customers and stakeholders) communications on criticalities identified in our supply base, (e.g.: critical non-conformities, audit delays, emergence of new risks in our sectors and regions of activity). Communications are always documented and logged.
7. We provided ongoing training to our auditing staff, comprised of 7 product technologists. In 2022 our training focus was on
  - a. Regulations and audit-verified evidence on working hours, temporary work contracts and legal management of contractors and sub-contractors,
  - b. Services offered by the “*Helpdesk anticaporalato*” national whistleblowing system, (sponsored by the Italian Government with the aim to curb the gangmaster phenomenon). This training



- was administered with the aim to enable our PTs to properly educate the audited sites' workforce on the existence, function and use of this protection tool.
8. We continued our collaboration with and participation in the activities of ETI's Italy Working Group and FNET (Food Network on Ethical Trade). We supported both groups in the development of tools such as ethical policy models and guidelines for the hiring and management of seasonal employees, to be circulated among group members and their supply chains.
  9. In January 2022 our Ethical Manager presented to FNET's Agent & Broker Working Group an overview of the ethical violations occurring or likely to occur in Italy's industrial tomato supply chain. This document drew from the considerable experience accumulated over years of activity in the tomato sector.
  10. In May and June 2022 we actively took part in a training activity aimed at increasing awareness of the importance of adopting a self-assessment system in the management of every company's workforce and ethical compliance. This training activity was jointly developed and administered with ETI and it was addressed to members of ETI's Italian Working Group and their Tier-1 and Tier-2 suppliers directly involved in agricultural activities or in the processing of agricultural produce. Atlante invited its suppliers of Canned Tomatoes and Sauces, due to these industries being rated as high-risk.
  11. We completed the "deep dive assessment" programme initiated with ESC 2021 and consisting of a pilot-project designed by ESC International to explore how to better engage with Tier 2 and 3 cooperatives in the high-risk tomato sector. Within the framework of this programme, training and tools were provided to three selected cooperatives across southern Italy with adapted training and guidance shared to support implementation. The programme included semi-announced audits relating to the monitoring and management of human rights, including risk assessment, and responsible recruitment of these farms. The resulting findings, including all non-conformities identified were reported to the tomato processors and the customer on the one hand and to Atlante's CEO and Purchasing Team on the other. The learnings will inform our selection procedures and purchase practices for the tomato supply base in future tender processes. are due to be published freely early next year.

The 2022 Atlante SMETA audits evinced the persistence of major NCs in working hours, contractors / labour providers management and H&S Management System.

## Atlante Ethical Strategy: our journey



2021



Delivery of an Atlante Academy webinar on legal requirements and international standards governing working hours. The webinar was aimed to both UK and Swiss market suppliers.



Active involvement into the FNET Agent & Broker Working Group.



Active participation in the "Capacity building projects" organized within the Ethical Trade Initiative Italian Produce Working Group.



One-to-one field ethical training /conversations with 5 high-risk Tier-2 suppliers in the Atlante tomato supply base.



Introduction of ethical KPI's in contracts with the five high risk Tier-2 tomato suppliers.

In season unannounced audits across high-risk Tier 2 suppliers in the Atlante supply base.



100% of producers supplying UK showed on Sedex with 100% Sedex SAQ's completed and updated at least once per year, 100% producers supplying UK compliant to our SMETA audit policy which requires suppliers to be SMETA audited at a frequency based upon their risk rating via Sedex Radar Tool.

Preparation of an Atlante Ethical SAQ for monitoring due diligence and risk assess suppliers used for markets different from UK and not showing on Sedex.

Continuous active liaising between suppliers and certification bodies to close out SMETA critical or major non-conformances within the auditor timeframe.

## Next steps: looking ahead

We carry on mapping our progress in combatting modern slavery, but there is more we can do to tackle modern slavery in our supply chains – particularly at times of increased tensions in the labour market, due to conflicts, speculation and the general weakening of welfare systems worldwide. We believe that, as a company dedicated to sustainable business - and even in the presence of complex and long supply chains - the risk of modern slavery within our own operations is relatively low. We do, however, recognise that some products we buy will include areas of risk, especially where agriculture is involved and the sourcing markets are geographically far and culturally different. While we continue to choose—and build—the sustainable culture that we believe in, we will also continue to have a clear why (purpose) and what (a value agenda). We already have clarity on which areas we want to focus more diligence and auditing efforts on over the next year: (H&S, culture among suppliers, whistleblowing systems and the closer involvement of smaller Italian tomato processors and sauce producers in our ethical projects).

This statement covers the period 1st January 2022 to 31st December 2022 and has been approved by the boards of directors of Atlante.

Signed

Natasha Linhart, CEO

Date: 2023-05-17