	GOLDENFRY FOODS	Doc. Ref. GFPOL-063
	MODERN SLAVERY POLICY	

What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It includes practices such as labour exploitation, forced labour, human trafficking, debt bondage, retention of identity documents, and other forms of coercion or control.

Goldenfry is committed to ensuring that modern slavery and labour exploitation do not occur within our business or supply chain. We are also committed to maintaining transparency in our operations and complying with our obligations under the Modern Slavery Act 2015.

This policy should be read in conjunction with the Goldenfry Modern Slavery Risk Assessment, which identifies specific areas of risk within our operations and supply chain and defines the control measures in place to mitigate those risks.

How We Manage Risk

Goldenfry recognises that the highest risks of modern slavery are typically associated with:

- The use of temporary or agency labour
- Recruitment practices
- Supply chain operations

These risks are formally assessed and documented in our Modern Slavery Risk Assessment, which is reviewed regularly. The controls outlined in this policy are designed to mitigate those identified risks.

Our Responsibilities as an employer


Goldenfry is committed to preventing modern slavery within its workforce through robust recruitment and employment practices.

All employees are required to attend a private, one-to-one induction on their first day of employment. During this process Goldenfry will:

- Check original identity documents to confirm they are genuine, belong to the individual, and that all personal details are consistent.
- Verify to individual's right to work in the UK.
- Provide the employee with their contract of employment for review.
- Explain the terms and conditions of employment to ensure full understanding.
- Confirm the employee has accessed and read the Employee Handbook, including key policies.
- Collect the employee's own bank account details
- Reinforce Goldenfry's zero recruitment fees policy, making clear that no worker should ever pay for employment at Goldenfry.

These procedures are regularly reviewed to ensure compliance with current legislation

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Employee Responsibilities

All employees are responsible for supporting the prevention of modern slavery. All employees are expected to:

- Read and comply with this policy and the Employee Handbook
- Act with integrity and avoid any activity that could lead to exploitation
- Report any concerns relating to modern slavery or labour exploitation
- Raise concerns through the Company's Whistleblowing Policy or directly to a line manager or senior manager.

The prevention, detection, and reporting of modern slavery is the responsibility of everyone working for or on behalf of Goldenfry.

Recruitment Principles

Goldenfry follows fair and transparent recruitment practices designed to reduce the risk of exploitation:

- Use of diverse recruitment channels
- Fair and non-discriminatory selection and application processes
- Competency-based selection
- Provide training to those involved in recruitment and selection
- Record keeping of recruitment decisions
- Job analysis is carried out as a basis for job descriptions and person specifications
- All job offers are subject to Suitability for Employment Checks, including:
 - Right to work checks
 - References (where appropriate)
 - DBS checks (where applicable)
 - Medical questionnaires or assessments
 - Qualification verification
 - Driving licence checks (if required)

Supplier Responsibilities

Goldenfry expects all suppliers to operate ethically and take appropriate steps to prevent modern slavery within their operations and supply chains.


Suppliers must demonstrate that they:

- Verify the identity and right to work of their workers
- Do not impose unlawful fees or wage deductions
- Ensure workers retain control of their own documents and bank accounts
- Monitor their own supply chains for risks of exploitation

Supplier compliance is assessed in line with risks identified in our Modern Slavery Risk Assessment, with higher-risk suppliers subject to increased due diligence

Failure to meet these standards may impact our ongoing relationship with the supplier.

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Reporting Concerns

Employees must report any suspicion or knowledge of modern slavery or labour exploitation immediately.

Goldenfry will:

- Treat all reports seriously
- Protect individuals from retaliation
- Investigate concerns appropriately
- Encourage workers to raise concerns through external channels where appropriate.
- Ensure continuous improvement

Goldenfry is committed to continuously improving its approach to preventing modern slavery. This includes:

- Regular review of the Modern Slavery Risk Assessment
- Ongoing training and awareness
- Monitoring effectiveness of controls
- Updating policies and procedures as required

Responsibility and Review

The General Manager is responsible for the implementation of this policy and its alignment with the Modern Slavery Risk Assessment.

This policy will be reviewed:

- Annually
- Following updates to the risk assessment
- After any identified incident

Approved by:



Guy Hall
General Manager

Date: 14th April 2026

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