

# Anti-Slavery and Human Trafficking Statement 2024



## INTRODUCTION FROM THE CEO

ALLOS Holdings Ltd and its subsidiary companies are committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices. The Directors are responsible for ensuring compliance in their respective departments and for their supplier relationships. Staff are expected to report concerns and management are expected to act upon them.

This statement has been published in accordance with the Modern Slavery Act (2015) and provides an update on our activities and commitments to prevent modern slavery in our operations and supply chains and sets out the steps we have taken during our last financial year.

## OUR ORGANISATIONAL STRUCTURE

ALLOS Holdings Ltd is an independent UK company founded in 2016 with subsidiary companies Lionel Hitchen Ltd and Lionel Hitchen USA Ltd. supplying flavour ingredients to the food and beverage industries since 1965.

Until March 2019, ALLOS Holdings Ltd was known as LHEO Holding Co Ltd, with subsidiary companies of Lionel Hitchen Ltd and Lionel Hitchen USA Ltd, and additional subsidiary companies of Allos Enterprises Ltd, Laughland Ltd and Kingsgate Ltd which have since been dissolved.

Lionel Hitchen Ltd is the main operating company and has employees based at two UK sites, in Barton Stacey and Andover. Lionel Hitchen USA Ltd has an office in Florida.

## OUR SUPPLY CHAINS

We have zero tolerance towards slavery and human trafficking and therefore expect all those in our supply chains and contractors to comply with our values. The relationship we have with our suppliers is very important to us and this year, we identified specific targets to increase the number of strategic suppliers having SMETA audits – see later section for details.

Our supply chains are worldwide and cover every continent except Antarctica. A wide range of raw materials are sourced principally related to the provision of flavour ingredients for food and drink, including items such as botanicals, essential oils, oleoresins, and flavouring substances. A range of other suppliers provide us with services such as laundry, pest control, waste removal and site contractors.

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We actively encourage our key suppliers on their social responsibility journey and the continuous improvements they are making.

### **POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING**

ALLOS Holdings Ltd and its subsidiaries are committed to treating their employees in a respectful and equitable manner, providing fair rewards and benefits for the jobs they carry out. In 2023, we put in place a new Anti-Slavery and Human Trafficking Policy to demonstrate our determination and commitment to tackling slavery and human trafficking. We also introduced a new Human Rights Policy and we reviewed our Anti-Corruption and Bribery Policy. We replaced our Equal Opportunities Policy with a Diversity, Equity and Inclusive (DEI) Policy and also updated our Grievance Policy and Procedure and our Whistleblowing Policy. Our Business Ethics Policy was reviewed in 2024 and reflects our commitment to acting ethically and with integrity in all our business relationships together with implementing and enforcing effective systems and controls.

In order to obtain independent assessment of our policies, activities and results we are members of EcoVadis.

Lionel Hitchen Ltd are AB members of Sedex, which provides the opportunity to review supplier SMETA audit non-conformances which can then be discussed to focus on best practice & opportunities for improvement. The last 4 Pillar SMETA audit was conducted at Lionel Hitchen in September 2023. This is shared with customers through the Sedex platform and we are proud to have received no non-conformances. In addition, the auditor noted a number of 'Good Examples' including our wages and benefits; our proactive approach to environmental improvement and sustainability and our 'very good' management system and Health and Safety systems. The Sedex platform has data which is regularly updated on global indices of countries' status on Environmental Performance, human rights and business ethics factors.

Lionel Hitchen Ltd is a signatory of the IFRA-IOFI Sustainability Charter in 2020 which is a voluntary framework showing our industries' sense of responsibility and commitment to making a difference.

In 2020 a Sustainability Policy was developed which encompasses all key aspects of governance regarding Social Responsibility. In 2021/22, we developed a Supplier Code of Conduct and a Supply Chain goal was for 20 key suppliers to agree to the Code of Conduct by the end of 2022. We were able to meet this target. 68 suppliers have signed an agreement to the Code of Conduct in the financial year 2023-24. We will

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continue to roll this Code out to further suppliers in 2024/25. The Code documents our expectations regarding compliance to legislation and upholding the principles of the Ethical Trading Initiative.

In 2021, 2022 and 2023, we received an EcoVadis Silver Sustainability Rating, which gives an evaluation of how well a company has integrated the principles of Sustainability/CSR in their business and management system. In 2024, we were delighted to be awarded an EcoVadis Gold Award, meaning we were among the top 5% of all companies assessed by EcoVadis last year. Our ongoing action plan has resulted in an improved score over the last 3 years: 58% in 2021; 63% in 2022, 69% in 2023 and 74% in 2024.

In 2024, we were a finalist for several awards: Solent 250 Climate and Sustainability Award, FDF Exporter of the Year and Realdeals Media Growing Business of the Year and Export Champion of the Year.

### RISK ASSESSMENT

Our food ingredient supply chains are regularly evaluated and include reviews of geographical risks and suppliers' ethical principles. These are then assessed against pre-determined criteria in order to identify areas of highest risk with regard to modern slavery. We acknowledge that certain countries will provide an increased risk of modern slavery.

Guidance is taken from the Sedex Radar platform which explores labour, human rights, governance and environmental risks within specific countries or regions. We have identified heightened risks where raw materials are sourced from countries which have a higher social responsibility risk and suppliers are not members of Sedex, EcoVadis or another ethical platform. We will continue to assess the segments of our supply chain then put in place measures to mitigate identified risks. This financial year we assessed 6 new raw material suppliers for environmental factors, ETI compliance, Environmental Performance Index, Modern Slavery index, CITES.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Supplier assessment is taken seriously as part of our due diligence with new suppliers being fully assessed prior to use & existing suppliers subject to regular review.

In order to monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains we have been undertaking the following due diligence processes in relation to all new suppliers:

- ✓ Suppliers are required to complete self-assessment questionnaires and provide product information on each raw material they supply to us. This information is reviewed and then decisions made with regards to approval for our raw material supply.

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- ✓ All suppliers are requested to sign an Ethical and Social Accountability Declaration and to complete a detailed Supplier Questionnaire. This requirement has now been extended to more of our key service providers.
- ✓ As part of our supplier approval process, we monitor which suppliers are members of Sedex & which have their own ethical declarations.
- ✓ 80% of our raw material suppliers are now Sedex members and 32% of our raw material suppliers are EcoVadis members. 100% of our raw material suppliers have confirmed they comply with the Ethical Trading Initiative code.

In 2022, implementation of the Qadex Supplier & Raw Material Approval system began, and this has now been completed for all of our suppliers and are now in the final stages of getting all our supplier raw material specifications onto Qadex, with over 65% completed. The aim is for 100% of completion by end 2025. This system will help us to manage risk assessments of our suppliers and ingredients and will make information sharing easier for both parties in future. Approximately 80% of our spend on raw materials comes from 13 suppliers, most of whom we have been sourcing from for over 20 years.

### STAFF TRAINING

We provide training to all key staff, particularly those involved in making purchasing decisions, to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

For example, the Whistleblowing Policy, available on our intranet system, is made clear to staff during site inductions and routine refresher training. Hard copies of our staff handbook (which includes the Whistleblowing Policy) are available to operational staff at key locations at both sites.

Between 1<sup>st</sup> October 2023 and 30<sup>th</sup> September 2024 812 e-learning courses and assessments were completed in HR, HSE, IT and food safety. These included e-learning courses on modern slavery, whistleblowing and anti-bribery. In 2025, we are rolling out Human Rights and Ethics training to key personnel.

### EMPLOYEE SUPPORT

Lionel Hitchen offers all its employees a confidential helpline and an employee assistance programme which they can ring free of charge 24 hours a day for support and advice. This enables any employee to raise any issue, including reporting modern slavery.

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## MONITORING OF OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We measure and control how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

- ✓ We monitor internal labour and payroll.
- ✓ We assess our material and packaging suppliers against pre-determined criteria.
- ✓ We make our staff aware of human rights.

In 2024, we introduced the following Key Performance Indicators to monitor our performance and to report to external interested parties how we are doing against our policy and standards:

### Human Rights and Ethics:

- Living Wage Employer accreditation
- Implementation of ISO45001 system
- Training on human rights and ethics for key personnel
- Improving the working environment in production areas

### Sustainable Supply Chain:

- 70% of strategic suppliers with SMETA audits by 2030
- 50% by volume of top 3 commodities sourced from certified sustainable agriculture by 2030
- 95% of suppliers on Sedex with SAQ completed by 2030.

These KPIs will help to ensure that we focus on improving modern slavery risk awareness and understanding across our business and through our supply chain.

## Anti-Slavery and Human Trafficking Statement 2024

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's Slavery and Human Trafficking Statement for the current financial year.

I, Eva Agnew, hereby certify that the information contained in the above Statement is factual and has been approved by Lionel Hitchen Ltd.'s Board of Directors.



Eva Agnew, Chief Executive

26th March 2025

Statement for financial year ending 30<sup>th</sup> September 2024

This statement was posted on the Lionel Hitchen Limited website and the Modern Slavery Registry on 31st March 2025