



MODERN SLAVERY STATEMENT 2016

THE COMMITMENT

La Doria is committed to avoiding any kind of involvement and showing any kind of tolerance to slavery and human trafficking connected with the company's products or commercial activities. La Doria is committed to continually re-assess, through a process of ongoing improvement, activities undertaken to fight modern slavery.

This declaration is reflective of the steps which La Doria has taken to act against modern slavery within its business and throughout the supply chain.

ORGANISATION OF THE BUSINESS AND SUPPLY CHAIN

La Doria Spa is a leading producer of tomato-based products, ready-made sauces, fruit juices and beverages and processed pulses. The company has a presence with the Major Supermarket and Discount chains both in Italy and abroad. It is owned 63% by members of the Ferraioli family, with a free float of 37%. La Doria Spa holds 58% of LDH (La Doria) Ltd, a company headquartered in the UK and leader of the Private Label market for tomato-based products, fish, fruit and vegetables, dried pasta and other foods. It has a presence in the major UK Supermarket Chains.

LDH issued a declaration in compliance with the Modern Slavery Act 2015 setting out the measures undertaken to ensure that slavery and human trafficking are not present within its supply chain, nor in any other part of its operations. For further details on the subsidiary's declaration, see the link <http://www.ldh ltd.com/home/slavery-act-statement/>.

The La Doria supply chain includes a number of companies operating domestically and internationally providing the raw materials, semi-finished products, products and services required for production and commercial needs. La Doria's procurement is sourced for approx. 73% from Italian companies, with the remaining 27% coming from overseas suppliers.

CURRENT POLICY AGAINST SLAVERY AND HUMAN TRAFFICKING

La Doria Spa rigorously applies the laws and regulations of the countries in which it operates and the principles of integrity and correctness, respecting the rights of all those with whom it interacts. This commitment is required not only of all in-house personnel, but also all those who directly or indirectly undertake business relations with La Doria. The Policy makes specific reference to employment and discrimination on the basis of age, sexual orientation, state of health, race, nationality, political opinion or religious creed. The Ethics Code and the website at the following link <http://www.gruppolaoria.it/IT/corporate-governance/modello-organizzativo.xhtml> permit anyone becoming aware of violations of the conduct rules and principles established therein to report such (anonymously if preferred) to the Supervisory Board. This Board was set up with the task of supervising compliance with the Ethics Code and the Organisation, Management and Control Model as per Legislative Decree 231/01 for the prevention of covered offenses. This is detailed in the company procedures, the Ethical Code and the Organisation, Management and Control Model ex Legislative Decree 231/01.

Suppliers are subject to the Ethics Code of La Doria, being required to comply with the conduct principles and rules contained therein. The Ethics Code, together with contractual relations, are essential to the supplier relationship. Non-compliance with its provisions permits La Doria Spa to enforce an express resolution clause. The company has begun a process to improve communication with the supply chain of the principles adopted, drawing up contractual clauses and guidelines to generally promote social responsibility and in particular the commitment to utilise labour which complies with national legislation and the conventions of the International Labour Organisation (ILO) in terms of labour, social justice and the universal recognition of human rights in the workplace.

The fight against "Caporalato" and illegal recruitment is a key objective which La Doria has earmarked to counter the modern slavery. In 2014, ANICAV (the National Industrial Processed Vegetable Association), of which La Doria is a member, signed a memorandum of understanding with a number of key trade unions for the promotion of social responsibility in the tomato supply chain for industrial processing companies. The agreement, in particular, promotes the correct application of the National Labour Contract and the fight against "Caporalato" and illegal recruitment.

DUE DILIGENCE PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

In addition to the contractual requirements, which require compliance with the Ethics Code and the other provisions in order to identify and mitigate risks in this area, La Doria Spa adopts the ISO 26000 guidelines on Social Responsibility for the Tomato supply chain considered most at risk with regards to the issues identified by this declaration. In 2016, SGS verified the tomato supply chain operating procedures of La Doria and their efficacy, issuing an Assurance Statement (<http://www.gruppoloria.it/assets/documents/ISO26000.pdf>).

In 2016, internal audits were carried out by an Independent Entity to verify the compliance of the tomato suppliers with the above-stated guidelines. Joint visits were carried out by technical and commercial teams for the assessment of raw material suppliers. La Doria is a member of SEDEX (Supplier Ethical Data Exchange), a non-profit engaged in the promotion of ethical principles throughout the global supply chains. The organisation is the broadest platform in Europe collating and processing data on the ethical conduct of supply chains.

In order to monitor the activities and the controls implemented to reduce the risk of modern slavery and human trafficking, La Doria Spa is currently engaged in a project to define KPI's which comply with the international GRI G4 Sustainability standard.

TRAINING

In order to promote understanding of the modern slavery and human trafficking risks present in its operations and supply chain, the company has launched a process of education and training to build awareness around the problems of modern slavery, both among in-house personnel and at suppliers, beginning with the highest risk chain (tomatoes) and working with specialised Sustainability consultancy firms.

Over recent years, close collaboration has been built up with the Northern European non-profit organisations, the IEH (Ethical Trading Initiative Norway) and the ETI (Ethical Trading Initiative), which lead a network of Non-Governmental Organisations, businesses and trade unions engaged in the promotion of workers' rights across the world. Collaboration with these organisations has led to education and discussion upon the issue and the identification of improvement opportunities for responsible chain management.

With a view to sustainable development, La Doria has undertaken a strategic path of adopting, reporting and sharing performances with regards to material issues for organisation stakeholders, which in 2017 will manifest in the publication of its first Sustainability Report.

June 30, 2017


The Chairman