



Modern Slavery Statement

Agrial Fresh Produce Ltd. Slavery and Human Trafficking Statement for the Financial Year ending December 2018

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps which Agrial Fresh Produce Ltd. has taken in this financial year to combat slavery and human trafficking.

Agrial Fresh Produce Ltd. has always been committed to preventing slavery and human trafficking in our supply chains. Taking these steps has strengthened our resolve still further and the tools it provides us with will empower us to do more than ever before in pursuit of this goal.

Our Business

Agrial Fresh Produce Ltd. is a food manufacturer in the fresh produce sector. We are part of Agrial, a French owned co-operative group. Agrial Fresh Produce operates across 4 manufacturing sites in the UK employing circa 1000 people.

Our business supplies prepared salad and beetroot products to customers within the retail, convenience, food service and business to business sectors of the UK & European market. Our actual business units are based in the UK but products are sourced both within the UK and internationally, mainly within continental European countries. From January 2019 we also have an integrated farming operation, Agrial Fresh Farms Ltd. based in the UK that supplies product to our factories.

Our Supply Chain

Agrial Fresh Produce Ltd works closely with their growers with many long-established relationships. All primary suppliers are SEDEX registered. We also work with suppliers accredited by Global GAP. Suppliers work with us in partnership to proactively ensure all appropriate measures are taken. They have a code of conduct they must adhere to.

As temporary and seasonal work is common practice within our supply chain it is an area that we have identified as a potential risk for slavery and human trafficking. Working in partnership with the GLAA (Gangmasters Labour Abuse Authority), ALP (Association of Labour Providers) and Stronger Together helps us support our growers and employees throughout our supply chain to minimise the risk of exploitation.

As a Company we have a robust supplier approval process which involves ethical audits to ensure our supplier's ethical stance is aligned with ours. We audit compliance in line with the ETI (Ethical Trading Initiative) Base Code. Our aim is to have transparency throughout the supply chain.

We have shared our Modern Slavery Statement, Code of Conduct and Ethical Sourcing Policy with all suppliers asking they comply.



Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Ethical Sourcing Policy, based on the ETI Base Code, reflects our commitment to ensuring all labour is employed ethically and with integrity in all our business relationships. This includes the implementation and enforcement of effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains. We also have a Human Rights Policy, which meets the United Nations Guiding Principles (UNGP) on Business and Human Rights. This policy highlights our commitment to Human Rights and what action we will take if we find that the human rights of our employees or workers in our supply chain are compromised.

Due Diligence Processes for Slavery and Human Trafficking and Risk Assessment

We have put in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.

We are operating in a sector that has a relatively high risk of slavery and human trafficking. We mitigate this risk by developing long standing sustainable relationships with our accredited suppliers. As part of the Agrial Group many of these suppliers are integrated into the supply chain as part of the wider Company. By working closely with UK suppliers and carrying out ethical audits we minimize the risk occurring. Our UK growers, including those with SMETA audits in place, have been visited and audited by the HR teams as part of our due diligence. The HR Managers have undertaken an external accredited auditing course to enable them to carry out these audits in a fair, transparent and comprehensive manner. Any non-conformances were then discussed and in partnership, suppliers were helped to resolve any issues.

By working in conjunction with Stronger Together and GLAA and promoting their posters, visual aids and helplines on site, we offer a confidential service so that people can raise concerns about slavery and human trafficking in our supply chains. All temporary labour supplied to our sites will be via an employment agency that is registered with the GLAA. In 2018 regular worker interviews took place with agency workers to ensure any potential risk of exploitation from traffickers could be determined.

As part of continuous improvement we have signed up for the Responsible Recruitment Toolkit and the Employer Pays Principle to ensure we are identifying worker mistreatment and exploitation at the earliest opportunity.

Supplier Adherence to Our Values

Agrial Fresh Produce Ltd expects all suppliers and any subcontractor engaged by the Company to respect and conform to our fundamental values as conditions for mutual business.

We have zero tolerance to slavery and human trafficking. We require our immediate suppliers to inform us what steps they are taking to monitor the risk of slavery and human trafficking further down the supply chain. We will not support or deal with any supplier knowingly involved in slavery or human trafficking.



Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. All Directors, Managers and Supervisors in the business have undergone Modern Slavery awareness training. HR team members have also attended GLAA (Gangmaster Labour Abuse Authority) and Stronger Together workshops. The Works Councils on all sites have had a GLAA awareness session.

All employees are expected to be alert to the risks, however small, in our business and in the wider supply chain. Employees are encouraged to report concerns and management are expected to act upon them.

With the addition of integrated farming in the UK in 2019 we have identified seasonal workers are a high risk category. Through ESC International and Sedex team members have undergone training in Worker Accommodation and increased awareness of modern slavery, with promotion of GLAA / Stronger Together materials and all supervisors and managers undergoing training we are minimizing these risks.

Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- We will continue to work with our agency suppliers to carry out audits, with agency workers being randomly interviewed to ensure no risk of exploitation.
- We will carry out worker audits with our own employees to ensure they are not at risk from external exploitation.
- Ethical audits will continue to take place via a risk based approach, which will be extended to include non-produce suppliers, to ensure that standards are met.
- The Stronger Together Progress reporting tool has been used to assess current status, throughout 2019 an action plan will be put into place to increase our progress score .
- The Responsible Recruitment toolkit will be used as a benchmark for our recruitment processes with the measure being an improvement in our initial assessment score .
- A full risk assessment will take place at our farming operation to ensure we offer workers safe accommodation with a comprehensive site accommodation plan and policy being implemented.

D Robertson

Doug Robertson
Managing Director
Agrial Fresh Produce Ltd.
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