

## Modern Slavery & Human Trafficking Statement FY 17/18

### Introduction

Greenyard Fresh UK Ltd offers the following statement in accordance with the UK Modern Slavery Act 2015. This statement covers activities regarding the detection and prevention of Modern Slavery and human trafficking in our operations, and our supply chains for the year ending 31<sup>st</sup> March 2018.

Greenyard Fresh UK are committed to developing partnerships with suppliers who share our common principles of Ethical Trade, transparency and are opposed to all forms of Modern Slavery and Human Trafficking.

### Our Structure and Supply Chains

Greenyard Fresh UK is a specialist importer, ripener and pre-packer of tropical, citrus and deciduous fruits, sourcing and growing products globally. Greenyard Fresh UK operate two packhouses based in Spalding, Lincolnshire. Greenyard Fresh UK source produce from 6 continents and nearly 50 countries. Due to the nature of fresh produce, two distinct seasons are operated, with countries in the Northern and Southern hemispheres utilised.

During the second half of FY 17/18, Greenyard Fresh UK appointed our first Ethical Trading Manager to drive improvements in current practices and address Modern Slavery risks within our supply chain. The 'Greenyard UK Ethical Strategy 2018-2020' has been approved by the Greenyard Fresh UK Directors, and combatting Modern Slavery is one of five strategic pillars identified.

### Policies and Procedures

In line with our commitment to continual improvement, and as identified in the 'Greenyard UK Ethical Strategy 2018-2020', we have identified the need for robust policies and procedures to be implemented across our operations and for management of our supply chains. Therefore, Greenyard Fresh UK has developed several policies and procedures to improve our detection, prevention and remediation of Modern Slavery:

- Ethical Trading Initiative Policy
- Preventing Hidden Labour Exploitation Procedure
- Whistle-Blowing Procedures
- Temporary Agency Provider Assessment Procedure
- Supplier Due Diligence Procedure

These policies and procedures will be reviewed, and where necessary further supplemented by additional documents over the course of FY 18/19.

### Training, Awareness and Capacity Building

Greenyard Fresh UK have separated our training, awareness and capacity building activities into two areas of focus- our supply chains and our own operations:

#### Our Supply Chains

During FY 17/18 we piloted Stronger Together training with one of our key supplier partners in the UK. The training and supporting resources enlightened the supplier to the risk of Modern Slavery and has driven them to implement additional controls within their organisation:

*“The reality and enormity of the problem was brought to life at the training. I believe that Stronger Together has focused our efforts to ensure that problem of modern slavery is highlighted across our business”*

*UK Topfruit Supplier, Stronger Together training attended March 2018*

Further to the success of the Stronger Together Initiative in the UK we were invited to join the Global Business Steering Group for the Stronger Together South Africa Programme, along with the South Africa Business Group. In FY 17/18 we provided strategic input into the development of the workshops and supporting resources and will roll the programme out to our South African suppliers in FY 18/19.

### Greenyard Fresh UK Operations

Greenyard Fresh UK have focussed our efforts on building awareness and capacity building within our own operations in FY 17/18. At our UK sites, all new employees are taken through the Stronger Together Initiative, provided handouts and shown a film to increase understanding of Modern Slavery. Posters are displayed in multiple languages across the sites, and Modern Slavery has been included as a specific agenda item for the monthly Colleague Forum and discussed at Board meetings. Greenyard Fresh UK supported Anti-Slavery Day (18<sup>th</sup> October 2017) by conducting several awareness raising activities.

Further afield, our Human Resources Director has increased awareness of Modern Slavery in the wider Greenyard Group through a presentation at the Greenyard Human Resources (HR) Conference in November 2017.

### Developing Partnerships

Greenyard Fresh UK recognise that Modern Slavery is a global problem that affects multiple countries, industries and sectors. We also recognise that the best way to combat Modern Slavery is by partnering with like-minded individuals and organisations to share and enhance knowledge. In addition to closer collaboration with our customers and supply base, we have worked with numerous industry experts over FY 17/18:

Organisations	
Gangmasters and Labour Abuse Authority (GLAA)	Supplier Ethical Data Exchange (SEDEX)
Association of Labour Providers (ALP)	Stronger Together in the UK and South Africa

### Risk Assessment, Management and Due Diligence

Greenyard Fresh UK have identified two distinct areas to focus our Risk Assessment, Risk Management and Due Diligence efforts - our supply chains and our own operations:

#### Our Supply Chains

Greenyard Fresh UK are AB members of SEDEX and therefore utilise the resources within that system to monitor ethical compliance and potential indicators of Modern Slavery within our supply chain. Every

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supplier is assessed using the risk assessment and forced labour indicator tools on SEDEX to identify areas of high risk, and where appropriate we insist on suppliers being audited by an independent third-party audit body to a recognised audit standard. The audit results, any Non-Compliances and evidence of corrective action implementation are then shared with us, and the relevant customer(s) on the SEDEX system, and successful closure must be demonstrated.

Greenyard Fresh UK Operations

Risk Identified	Mitigating Control (s)
Ethical and Modern Slavery risks in our packhouses	<ul style="list-style-type: none"> <li>● Third party SMETA audits conducted at our sites with results uploaded to SEDEX</li> <li>● Stronger Together Resources implemented at induction</li> <li>● Continued membership of the Association of Labour Providers (ALP)</li> <li>● Robust HR Management System</li> </ul>
Agency Providers to our packhouse operations	<ul style="list-style-type: none"> <li>● Temporary agency providers must be GLAA licensed</li> <li>● Conduct 6 monthly audits by our in house trained personnel</li> <li>● Temporary agency providers must be Stronger Together Business Partners and keep up to date with changing legislation and trends.</li> </ul>

**Modern Slavery System Effectiveness**

During the reporting period, Greenyard Fresh UK did not uncover any instances of confirmed Modern Slavery or Forced Labour within our operations or our supply chain.

During FY 18/19 we plan to raise awareness, train and work closely with our suppliers to improve the knowledge and understanding within our supply base. This may lead to an increase in reported cases. All investigations will be logged, investigated and outcomes shared internally. We will conduct trending to indicate hotspots and identify emerging or recurring issues.

**Targets FY 18/19 and Beyond**

We are committed to evolving our programme to combat Modern Slavery, and as such have outlined challenging targets for FY 18/19. These have been shared with our key customers to ensure accountability.

This statement has been prepared in accordance with the UK Modern Slavery Act 2015 and has been approved by the Greenyard Fresh UK Board of Directors.



Alan Forrester

Managing Director- Greenyard Fresh UK

August 2018