



Modern Slavery Statement 2020

This statement is published in accordance with the Modern Slavery Act 2015 and sets out the steps the Company has taken to prevent slavery and human trafficking taking place in our business or in our supply chains.

Modern slavery has no place in our business, or our supply chains and S&A takes a zero-tolerance approach to it. Whilst recognising that modern slavery affects every economy and can take many forms, including forced labour, child labour, human trafficking and bonded labour, we are strongly committed to playing our part in eradicating modern slavery and recognise the importance of Transparency in Supply Chains in driving collaborative action to help eliminate the incidence of modern slavery.

“We will play a leadership role within our industry in promoting the dignity of the people who grow, harvest and pack the fresh produce we sell. Those who work in our business (UK and International) and our global supply chain will be recruited and employed responsibly” ...John Davies, Director & Founder.

Organisation

This statement applies to S&A Fresh Produce (UK) Limited, Moneypeak Limited & S&A Group Holdings Limited (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year January – December 2020.

S&A is the UK’s largest independent Strawberry grower. It is also a global business with its own growing operations and partnerships with growers around the world, importing and packing high quality fresh berries for the UK retail market. Our fruit is grown on our own farms or sourced globally from partner growers who share our values and passion for quality produce.

Our Headquarters are based in the rural Herefordshire countryside of Marden. Other UK locations include Leominster (Herefordshire), Kent and Wales.

Our peak periods of production are from April – October. The labour supplied to the Organisation in pursuance of its operation is predominately recruited from the UK and EU Member states, namely Bulgaria and Romania.

The organisation has principles and ideals that it follows and upholds in all its interactions, whether internal or external. The organization ensures through its management and employees that it adheres to these principles.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.



The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

To prevent modern slavery in our business or our supply chains, we need to make our own Directors and employees aware of the issues and provide them with the tools to tackle it.

Maintaining an ethical supply chain

S&A like many international suppliers understand that the greatest risk of modern slavery is through our supply chains. To mitigate this risk, S&A's approach to tackling modern slavery is based on a collaborative approach that focuses where possible on building long term relationships that help to develop greater transparency for us and those we work with.

S&A uses a tiered approach with its supply chains:

- One to one communication – Our Commercial and Technical teams have regular communication and work closely in partnership with our suppliers and growers to ensure our operations remain free from modern slavery.
- Face to Face - we visit our suppliers and growers, to see first-hand how their businesses are operating. We also conduct ethical audits to the ETi base code and to provide additional support or guidance if required.
- 3rd Party Verification – additionally we arrange bi-annual unannounced independent ethical audits to the ETi base code, for those countries that have been risk assessed and considered high or medium risk, to provide another level of transparency to our supply chain and assist us in driving further improvements collaboratively with our suppliers and growers.

We work with our suppliers and growers on a basis of continuous improvement to resolve issues. When an issue is identified, the type of corrective action implemented will depend on a number of factors. These include the severity of the issue and the willingness of the supplier or grower to work jointly towards a solution. Sensitivity of the situation and welfare for the persons involved will always remain a priority when agreeing a solution. If a severe risk or issue is not resolved satisfactorily, we will stop working with the supplier or grower in question. The relationship will only resume once we are satisfied that the issues have been fully resolved.

In our own business

S&A has received on-site verification of their ETI base code conformance through independent, third-party Sedex Members Ethical Trade Audits that are semi announced. The third-party audits follow version 5.0 December 2014 two pillar audit up to and including April 2017 and version 6.0 thereafter, which includes an assessment of Labour Standards, Health and Safety, Environment and business ethics.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in the recruitment of seasonal agricultural workers because it involves the provision of labour in a countries where protection against breaches of human rights may be limited.



In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

We have taken a variety of actions to verify the absence of forced, child, or bonded labour and human trafficking in any part of its own business, including the following:

1. Designated managers who have attended “Tackling Hidden Labour Exploitation” training and have responsibility for developing and operating company procedures relevant to this issue.
2. S&A does not allow finders fees to be paid by job applicants. The Company does not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. All staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and signs to look for and have signed form HRF-038 Recruiter Compliance Principles.
4. Labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members with a clear hierarchy and areas of responsibility.
5. Take a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
6. Provided information on tackling “Hidden Labour Exploitation” to our workforce through workplace posters & worker leaflets.
7. Encouraged workers to report cases of hidden third party labour exploitation provided the means to do so and investigated and acted on reports appropriately.
8. Positively encouraged and supported employees and agency workers to report such exploitation which may be occurring within their communities through our report mechanisms (Seasonal Liaison Officer, whistleblowing service, comments box). All reports are investigated in full and remedial action is taken as appropriate. Importantly the whistleblowing hotline is independently run and is a multi-lingual facility. The whistleblowing telephone hotline service is available 24/7 as is the internet reporting service and callers can choose to disclose their details or remain anonymous.
9. Conduct a monthly audit of personnel records identifying any duplicate home addresses, bank accounts, phone numbers emergency contact numbers and next of kin s alert flags that may indicate potential worker exploitation. Any suspicious duplicates.



Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the 2020 financial year in line with the original publishing requirements.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

We were able to meet the increased demand due to expansion projects that have taken place in order to increase our available tonnage. The Organisation did not need to engage additional temporary labour from employment agencies in order to meet the need of its customers as we responded quickly and efficiently by bring our European workers earlier (March) and successfully recruiting from the UK labour market.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

The Organisation took the decision from the outset of the pandemic to ensure that all of the workforce who were required to self-isolate in accordance with public health guidelines continued to receive full pay during their absence.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Our Commitments for next year

- Appoint 5 Modern Slavery ambassadors
- Increase staff training levels
- Establish quarterly meetings with key stakeholders to consider how best to assess risk, carry out due diligence and review KPI's
- We will continue to develop our risk assessment and due diligence processes and put in further measures where areas of risk are identified

Policies

The Organisation has the following policies which further define its stance on modern slavery:

- Preventing Hidden Labour Exploitation
- Anti-bribery policy and procedure
- Dignity at work policy
- Disclosures in the public interest (whistleblowing) policy
- Equal Opportunities Policy
- Ethical Trading Policy and procedure
- Induction Policy and Procedure
- Proof of eligibility to work in the UK procedure
- Staff Charter



These policies define our commitment to the upholding of human rights and fair labour by setting out the minimum standards that we expect to be adhered to. They are regularly reviewed to ensure that they are in line with statutory declarations such as the UN Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. We also integrate best practice expectations from the Gangmasters and Labour Abuse Authority (GLAA) from whom we regularly receive updates.

In addition, S&A has a long history of working with Stronger Together, an initiative that aims to reduce human trafficking, forced labour and exploitation of workers for the prevention of modern slavery. S&A is also a member of Sedex (a not-for-profit membership organisation dedicated to driving improvements in global supply chains).

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed:

A handwritten signature in black ink, appearing to read 'JD', is written over a white rectangular background.

Name: John Davies
Title: Director & Founder
Company: S&A Group
Date: 31 March 2021