



## Modern Slavery Statement 2016

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.**

### Our Business

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.

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.

S&A provide regular training for all Directors and employees, to help them understand the commitments and obligations of our business and how they can help to ensure modern slavery is not part of our business or our supply chains.

We also have the following policies in relation to slavery and human trafficking:

- 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
- Seasonal workers reemployment 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).

### 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.
- 3<sup>rd</sup> 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 the version 5.0 December 2014 two pillar audit, which includes an assessment of Labour Standards, Health and Safety, Environment and business ethics.

S&A recognise that there is a risk of slavery and human trafficking taking place within its Seasonal Recruitment Process. 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 were 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 an annual audit of personnel records identifying any duplicate home addresses, bank accounts, phone numbers emergency contact numbers and next of kin as alert flags that may indicate potential worker exploitation. Any suspicious duplicates (i.e. not joint accounts for two

related workers) are fully investigated and remedial action is taken as appropriate, with the view such duplicates are an indicator of potential modern slavery.

This statement has been approved by the Board on 23 June 2017 and constitutes our commitment to avoiding slavery and human trafficking for the financial year ending 31 December 2016.

Signed

A handwritten signature in black ink, appearing to be 'JD', on a white rectangular background.

Name: John Davies  
Title: Director & Founder  
Company: S&A Group  
Date: 23 June 2017