



G's Modern Slavery Statement 2016/17

The statement covers the activities of The Shropshire Group of companies in the UK up to 7th May 2017.

Introduction

G's is aware of the modern slavery risks and acknowledges responsibility to the Modern Slavery Act 2015. We are committed to establishing action plans to eradicate acts of slavery and human trafficking from our own businesses and from within our supply chain.

We also endeavour to achieve transparency within G's and with its suppliers and focus on continuous improvement. Moreover, G's commits to respecting human rights and will avoid infringing on the human rights of others and will address any issues that are identified. This will include taking adequate measures for prevention, mitigation and, where appropriate, remediation of incidences of modern slavery found in our business and in our supply chain.

Structure of the business

G's is an international farming business established in 1952. Today we supply all the major UK retailers and many in Europe with fresh vegetables and prepared produce. We remain a family business with very strong values for its people, its customers, the environment, nature and its suppliers. Across the Group, G's policies and management systems are aligned to our common values and the aims of ethical treatment of those who work on our sites.

In addition to business units within the Shropshire Group, this approach is extended across a wider sphere of influence including key suppliers, labour providers and the G's Growers Producer Organisation.

The majority of our products come from our owned farms, packhouses and food preparation facilities located in the UK, Spain, Czech Republic, Poland, Senegal and the USA. In most of these countries our seasonal workers are employed from abroad.

Especially in the UK, we employ a large number of seasonal workers predominantly coming from EU countries. We directly recruit the majority of our seasonal workers. Furthermore, G's provides accommodation, social activities and welfare support on many of its sites.

In addition to our own sites, the business also utilises a range of suppliers from 25 different sourcing countries to ensure year-round supply. Our top 10 sourcing countries by gross sales value during the financial year 2016/17 were:

TOP 10 SOURCING COUNTRIES
UK
SPAIN
SENEGAL
EGYPT
HOLLAND
MOROCCO
ITALY
GERMANY
USA
PORTUGAL

All suppliers are held to account via a comprehensive ethical due diligence and supplier approval procedure.

Review May 2016 to April 2017

G's owned business

In 2016/17 our focus was on seasonal labour and external labour providers in the UK and Spain.

Seasonal Labour

Enabling communication is one of the most powerful tools we have to detect exploitation. All seasonal workers have received inductions with understandable information regarding modern slavery. Furthermore, posters with modern slavery information and a link to our hotline as well as external support have been distributed in all UK sites. When confidential grievances have been raised through our Speak Up hotlines, these have been actioned accordingly.

Labour Providers

Audits: All labour providers supplying the G's Spanish and British farms have been audited and assessed by our dedicated Ethical Audit team. Through this process, standards have been raised and knowledge improved within our labour providers. The Ethical Audit team has attended modern slavery and exploitation prevention training by the GLAA, as well as specific training regarding audit techniques to uncover exploitation. Audit methods have been updated accordingly and are being used to benchmark all labour providers against best practise standards for preventing labour exploitation.

Risk Assessment: All agencies have undergone a risk assessment based on both intrinsic factors as well as audit results and the result of the best practise benchmarking standards.

G's Supply Chain

Approval: In 2017, technical and ethical due diligence has been brought together under a common Supplier Approval Procedure. Ethical approval is dependent on a combination of due diligence and risk assessment. Each supplier needs to complete as a minimum a questionnaire covering modern slavery related due diligence procedures.

Outlook May 2017 to April 2018

G's owned business

After in-depth modern slavery training for the whole Ethics team through a renowned consultancy and GLAA, we have expanded our key areas of risk. In 2017, our focus was on seasonal labour and the relating thereto external labour providers. In addition, we have now increased our focus areas for our own business units beyond third-party labour providers, to the entire recruitment process, and hidden third-party exploitation outside the workplace. Furthermore, the dedicated Ethics team has been expanded to further support thus mitigating the risk of modern slavery in our own business and supply chain.

Labour Providers

Audits: The experienced team will continue to audit all labour providers supplying the Group twice-yearly with an updated audit methodology including Stronger Together checks.

Risk Assessment: The score from the risk assessment will be used to measure the exposure of risk the business has via its labour providers. In 2018, we will report back the result from our risk assessment and give valuable consultancy to our businesses.

Communication: It is important to enable good communication across all workers in order to detect exploitation. Additional measures will also be taken to ensure meaningful communication with agency workers. The following additional tools have been developed and will be rolled out at all sites which use external labour providers; regular sample surveys checking for key indicators, giving information regarding modern slavery to agency workers during site inductions, and ensuring agency representation in worker committee meetings.





Recruitment

G's has formal HR procedures which guard against informal recruitment. Our actions this year will be to increase the depth of knowledge we have regarding anyone who may have introduced an applicant to the company.

Mapping Introduction Channels: We will standardise the new starter protocol to ensure full information regarding anyone who may have introduced a candidate to the company is captured during interview, and create appropriate data fields in the HR system to ensure that this is reportable.

Training: Any person in a role involved in induction or recruitment will have third party modern slavery and exploitation training added as 'mandatory' on the G's Learning Management System and will receive this training in modern slavery awareness.

Hidden third-party exploitation

The greatest risk of modern slavery in our business is the occurrence of hidden third-parties engaged in exploitation of our workers via debt bondage, threat, and housing control outside of G's. To tackle this often hidden problem, several measures have been put in place for prevention and detection.

Information for all Workers: Our inductions will be standardised to include understandable information regarding modern slavery. Along with our induction pack, we will provide background information on life in the UK including rights, typical costs and public services.

Confidential Reporting of Grievances: G's operates both an internal helpline; the People's Helpdesk, and a third party confidential hotline; SpeakUp. These are vital avenues of support for anyone who is experiencing a problem which they feel unable to report through the usual channels. In 2017/18 we aim to increase awareness of this hotline,

measuring success via additional questions in our staff survey.

Workers' Committees: The G's People Forum is an essential channel for communication, and to engage on any possible signs of exploitation in the workplace. All of our G's People Forum representatives will receive training on modern slavery and be encouraged to add issues to their agenda.

Embedding & Training: In order to ensure that our anti-slavery procedures are effective and fully implemented, the company has formed a Modern Slavery Steering Group composed of HR and Ethics teams, which is consulted on relevant procedure development and how it could be best implemented in all areas of a diverse business.

This steering group has additionally identified responsible parties for each business unit as Site Champions for modern slavery. These Champions will receive comprehensive third-party training in recognising and supporting victims, as well as in-depth understanding of the issues. They will be responsible for driving forward the implementation of relevant procedures, raising awareness onsite, and will be equipped to know how to react if a case of exploitation is found.

Furthermore, these Site Champions will be empowered to cascade training to key people on their site - such as line leaders and worker representatives. These roles will have modern slavery training marked as 'core' within the G's Learning Management System, ensuring coverage going forward as new people move into those roles. This training will specifically focus on spotting the signs of labour exploitation and how to report it using our dedicated reporting tools.





Monitoring: General awareness of the signs of modern slavery in the workplace will be increased at all levels and employees encouraged to report 'yellow flags' via established channels. Central analysis will pull together these alerts from multiple sources to establish any patterns which require further investigation. Data collection for these alerts will be further enhanced by establishing improved additional interviews with new starters during their onboarding process, and additional key reportable fields in the HR system.

Victim Support Process: In addition, we also recognise that the process after discovering a potential victim of exploitation is important and to establish a victim support procedure including NGO's and other support offered.

G's Supply Chain

We are primarily a producer business, but do use third party suppliers to ensure constant supply throughout the year. As these operations are outside of our direct control we have to rely on information provided to us by our suppliers. We have therefore set-up a number of due diligence techniques to ensure the risk are mitigated.

Risk Assessment: The Ethics Team will develop a risk matrix for all suppliers across the G's group, where possible through to grower level. The data for the risk assessment is in the first place derived from site data, a registration in

the ethical database SEDEX which includes a detailed self-assessment questionnaire, country risk scores from credible indices, and 3rd party audit history. Supplementary information which is relevant to assessing for risk of modern slavery is also collected via an internal approval system, second-party ethical audits, and visits by technical teams.

All information will be incorporated into the overall risk score for all G's suppliers. When a risk score of a site is high or medium for a programmed supplier, we seek to mitigate that risk. By influencing procurement decisions and mitigation activities, we aim to reduce the overall risk score in our supply chain.

Training: All of our Tier 1 suppliers will be requested to conduct appropriate modern slavery training.

This statement has been approved by John Shropshire, Chairman of G's Fresh on the 15th September 2017. It will be reviewed and updated annually.

