



G's Modern Slavery Statement 2017/18

The statement covers the activities of The Shropshire Group of companies in the UK up to 7th May 2018.

Introduction

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

The Shropshire Group is an international group of farming companies established in 1952. This Statement concerns all companies within the Group. Today we supply all the major UK retailers and many in Europe with fresh vegetables and prepared produce. Across the Group, G's policies and management systems are aligned to our common values and to 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 mainly employed from abroad. 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 Group 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 2017/18 were:

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

Review May 2017 to April 2018

1. G's OWN BUSINESSES

In 2017-18, the focus area for G's business units in the UK were as follows:

Firstly, to risk-assess and where necessary improve recruitment/onboarding processes and so reduce the likelihood of third-party exploitation by arranging unofficial and hidden recruitment channels.

Secondly, to increase the likelihood of detecting any situation of such exploitation via a programme of widespread training combined with central data analysis.

Thirdly, to ensure that should any case occur, there would be clear procedure and responsibility regarding the immediate and long-term response - in order to protect both the victims and viability of potential future criminal cases.

Fourthly, to embed ownership of the programme at site level, in order to improve engagement and effective policy development.

Progress with these aims is summarised below, as well as goals for 2018/19.

1.1 Prevention - Recruitment and Awareness

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. With understanding of general methods employed by third-party exploiters in mind, certain procedural updates have been implemented to disrupt the efforts of such individuals as far as possible.

1.1.1 Mapping recruitment channels

G's has formal HR procedures governing onboarding and recruitment to prevent unlicensed gangmasters, illegal working, discrimination, or exploitation. In 2017-18, we focused on developing these procedures to deepen understanding of key aspects which could highlight whether a candidate is in a potential situation of exploitation.

The New Starter form was redesigned to ensure fuller information regarding informal introductory channels is captured in all cases. This is now in use across the UK Group.

Business units have been equipped with a semi-structured conversational interview protocol, to be conducted as part of their onboarding process, with the intention of revisiting potential victims sometime after beginning work, at a stage when they are more likely themselves to be aware of any issues. This is now being employed on a risk-assessed basis across the UK Group.

Induction materials have been redesigned to be more relevant for their target audience, with the intention of increasing general awareness and triggering reporting through clearly defined avenues in any actual case. These standardised inductions are now in place across the UK Group.

In 2018/19 the new starter checks will be reviewed to upgrade the quality of the information captured, and HR systems updated to make the new fields reportable. In addition, the risk-based use of the additional onboarding interview tools will be analysed and the best approach for each business unit determined and formally defined.

1.2 Detection, Training and Monitoring

A coordinated programme has been implemented to detect any hidden third-party exploitation affecting those working at our sites or in the areas in which we work. The core principles of this are to produce data regarding warning signs and process this data effectively.

1.2.1 Training

In 2017-18, a training programme was put in place which focused on raising awareness among key employees who are in regular contact with individuals who might be at risk. The roles identified primarily included team/line leaders, those involved in recruitment, accommodation staff and People Forum representatives.





The number of people receiving this training over the period was 143, and a further 104 received a more substantial half day bespoke training from the GLAA (Gangmasters Licencing and Labour Abuse Authority) Academy. To ensure sustainability, the requirement for modern slavery awareness training was captured in our Learning Management System, and 20 Site Champions were authorised to deliver this training in-house, after receiving a 1.5-day training course from the GLAA Academy.

1.2.2 Detection

The intention of this widespread training was to increase the reporting of potential indicators of exploitation to a central monitoring team who could spot patterns across the Group and escalate issues of concern to the authorities. Efforts were also made to increase reporting by increasing use of our confidential reporting hotline SpeakUp - this included a full rebrand and launch of videos explaining the mechanics of how anonymity is assured by SpeakUp. Additionally, the established annual Staff Survey was updated to monitor for key indicators of potential exploitation.

1.2.3 Monitoring

The system of raising potential indicators of concern has been internally branded the 'yellow flags' system. The system consciously 'sets a low bar' for raising a flag but by doing so ensures that the central ethics team has early visibility of any emerging issues. Several hundred flags were raised in 2017/18.

In 2018/19 continued efforts will be made to keep reporting levels high. Those identified individuals who have not yet received training will do so. Internal training for managers will be adapted to cover the broader topic of 'responsible recruitment'.

1.3 Case Management and Victim Support

If a case of exploitation is uncovered or suspected, it is crucial to manage the situation effectively in order not to endanger the victim(s) or any future criminal case.

1.3.1 Case Management

Clear avenues of reporting any issues of concern to either the central Ethics team or the Site Champions ensures that the crucial processes recommended by the GLAA regarding case preservation are maintained.

1.3.2 Victim Support

In addition, the Site Champions are issued with guidance about how to manage any identified or established victim which is contained in the Site Champions Handbook. This details how to support both potential victims who are awaiting support from the authorities, and those who have been identified and offered referral to the NRM (National Referral Mechanism). With understanding that individual situations are unique, the primary concern of the procedure is to establish a specific point of contact and meet with the individual to establish their needs.

In 2018/19, victim support guidance will be adopted into formal policy structures, and the business will seek to strengthen links with available external services offering support to victims. We will also seek to formalise with our customers the correct reporting procedures for confirmed cases.



1.4 Embedding

G's has a central Ethics team which oversees the development of policies such as the modern slavery strategy. However, the team aims to embed all processes relating to ethical labour management in the site operations themselves, to improve ownership and effective policy development.

1.4.1 Policy Development and Steering Group

In order to ensure that our anti-slavery procedures are effective and fully implemented, the company formed a 'Modern Slavery Steering Group', composed of Human Resources and Ethics teams, which is consulted on relevant procedure development and how it could be best implemented in all areas of a diverse business. In 2017/18, internal guidelines and procedures relating to the prevention of modern slavery have been captured in the 'Site Champions Handbook'.

1.4.2 'Site Champions'

This steering group has additionally identified responsible parties for each business unit as Site Champions for the prevention of modern slavery.

These Champions received comprehensive training in recognising and supporting victims, as well as in-depth understanding of the issues concerned. In addition to cascading awareness-level training on their site, they are responsible for driving forward the implementation of relevant procedures, raising awareness onsite, and are equipped to react appropriately if a case of exploitation is found - protecting both victim and the criminal case.

In 2017/18, internal guidelines and procedures relating to the prevention of modern slavery have been captured in the 'Site Champions Handbook'. In 2018/19 these procedures will be captured more formally in company policy and responsibilities defined more rigorously. In addition, a rollout programme will be defined in order to ensure consistent and embedded application of procedures.

2. LABOUR PROVIDER MANAGEMENT

Though direct employment is preferred, the G's Group and some of its key suppliers do, where necessary, utilise agencies to supply labour. All of these agencies are subject to significant due diligence and steps are continuously undertaken to improve monitoring and audit processes. These are detailed below, as well as ambitions for 2018/19.

2.1 Audit methodology and agency capacity building

In 2017/18, the Ethical team continued to audit all labour providers serving the group business units as well as its key customers. A benchmarking exercise was undertaken for all labour providers using Stronger Together templates. These templates were subsequently refined and adapted to audit requirements.

Assessment according to these standards required by the updated 2017-18 Shropshire Group Service Level Agreement, and once completed assessment feeds into the risk score KPI (Key Performance Indicator) for a particular agency. The agency is given feedback in the form of an action plan on how to reduce their risk score. Labour users are also communicated the risk score of their agency to inform their choice of agency. A similar process is being undertaken with agencies outside the UK operations, for which additional context-specific audit methodology, including modern slavery systems strength assessment, has been developed.

2.2 Agency worker voice

The strength of our second-party agency audits lies partly in the combination of documentary with testimonial evidence. Workers from all agencies are interviewed at random while onsite as part of the internal audit cycle and their testimony can in certain cases directly influence the risk score of their agency.





Additional tools were developed in 2017/18 to improve information gathered from agency workers. These include a multi-language agency 'spot survey' and the inclusion of agency representatives on G's People Forum committees. These additional communication channels have been implemented at those G's business units which use third-party agencies.

In 2018/19, the use of the risk assessment tool as well as the fulfilment of advisory action plans given to the agencies regarding modern slavery risk prevention systems should result in a measurable overall reduction of this KPI for the Group.

Benchmarking will be undertaken, and specific support designed to remedy any consistently under-implemented aspects of the suggested procedures.

Agencies will be supported in any third-party certification they seek to achieve, and as industry best-practise standards evolve these will be incorporated into the audit methodologies. Specific and useable audit tools and risk assessment for agencies in non-UK operations will continue to be refined.

Regarding those tools developed to improve communication channels for agency workers at our sites, the efficacy of these methods will be reviewed, and best-practise standardised by policy across the Group.

3. G's SUPPLY CHAIN

We are primarily a producer business, but do use third party suppliers to ensure constant supply throughout the year. We have taken a number of measures to ensure sufficient due diligence relating the supply chain including a comprehensive risk assessment of the entire supply chain into the UK down to grower level.

This covers all relevant matters relating to ethical labour management, of which modern slavery is a part. Nevertheless, risk factors and mitigation strategies relating specifically to modern slavery are analysed and employed, respectively.

3.1 Supplementary information regarding modern slavery risks

Programmed fresh produce suppliers are requested to undertake a specific Self- Assessment Questionnaire (SAQ) designed to cross-check SEDEX (the Supplier Ethical Data Exchange) SAQs as well as highlight specific factors of risk which SEDEX does not cover. These include factors relevant to modern slavery risk factors such as recruitment practises. Emergency/single use suppliers which do not have SEDEX are risk assessed using the same tool. 80% of suppliers into the UK have completed this SAQ to date.

3.2 Capacity building and training in the supply chain

We have requested that all UK production sites in our supply base undertake modern slavery training with Stronger Together or an equivalent provider. Over 75% of these suppliers have provided evidence of this to date.

In 2018/19, we will continue with efforts to increase the proportion of suppliers who have completed this requirement and strengthen ethical due diligence systems for supply chains feeding operations outside the UK.

This statement has been approved by John Shropshire, Chairman of G's Fresh on the 15th September 2018. It will be reviewed and updated annually.

