

G's Modern Slavery Statement 2019/20



The statement covers the activities of The Shropshire Group of companies in the UK up to 7th May 2020.

Introduction

G's is aware of modern slavery risks and acknowledges its responsibility to abide by the Modern Slavery Act 2015. We are committed to establishing action plans to prevent 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 to focus on continuous improvement. Moreover, G's commits to respecting human rights and will avoid infringing the human rights of others, addressing any issues that are identified. This will include taking adequate measures for the 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 a group of farming and food processing businesses, established in 1952. This Statement concerns all companies within the Group. These companies are as follows:

- Barway Services Limited
- Cambs Farms Growers Limited
- East Coast Growers Limited
- G's Fresh Limited
- G's Fresh Beetroot Limited
- G's Group Holdings
- Littleport Mushrooms Limited
- G. S. Shropshire & Sons Limited
- J. B. Shropshire & Sons Limited
- Sandfields Farms Limited
- The Lettuce Company

Today, we supply all the major UK retailers, and many in Europe, with fresh salads, 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 and labour providers.

The majority of our products come from our 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 directly recruited from abroad. Furthermore, G's provides accommodation, social activities and welfare support on many of its sites.

Supply Chain

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 2019/20 were:

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

1. G's OWN BUSINESSES

The programme of risk reduction within G's own businesses can be summarised as follows:

Firstly, to maintain and improve recruitment/onboarding processes and so reduce the likelihood of third-parties 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 is a clear procedure and line of responsibility regarding immediate and long-term response, in order both to protect the victims and not endanger 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 2019/20.

1.1 Prevention - Recruitment and Awareness

The greatest risk of modern slavery in our business is the occurrence of hidden third-parties engaged in the exploitation of our workers via debt bondage, threat, and housing control outside of G's. Bearing in mind the general methods employed by third-party exploiters, certain procedural updates have been implemented to disrupt the efforts of such individuals as far as possible.

1.1.1 Awareness and Collaboration

On 31st January 2020, G's hosted an Industry Modern Slavery Conference. With the theme "Working Together to Prevent Modern Slavery", this event gathered more than 200 stakeholders from the private, public and third sectors. During the day, various breakout sessions were carried out to identify strengths and improvement areas in relation to modern slavery cases.

Further to this conference, G's held conversations with retail partners to launch a platform to share modern slavery intelligence. Conversations will continue throughout 2020/21, involving a wide range of industry stakeholders.

1.1.2 Mapping Recruitment Channels

G's has formal HR procedures governing onboarding and recruitment to prevent unlicensed gangmasters, illegal working, discrimination, and exploitation. In addition, these procedures aim to discover and capture information about informal referral in order to help identify covert labour intermediaries.

During the period of labour shortages produced by the COVID-19 crisis, additional efforts have been made to maintain control over any direct recruitment, also with the aim of identifying potential hidden labour intermediaries. Audit protocols were amended to be applied remotely.

All UK recruitment streams were risk assessed during 2019/20. Twelve plans were created upon those findings, with the goal of reducing associated risks.

Control over recruitment fees and associated costs incurred by job seekers represents a strategic goal within our modern slavery strategy. After mapping all associated costs across the highest risk European recruitment streams, we have proactively shared our methodology with other industry peers and stakeholders, as part of our collaboration within the Food Network for Ethical Trade (FNET) work stream on recruitment fees.

In 2020/21, recruitment risk assessments will continue to be expanded in our non-UK operations.

Additionally, the Responsible Recruitment training module will be included in the role specific training requirements hosted on the learning management system and will be delivered to more individuals.



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 to process this data effectively.

1.2.1 Training

G's delivers an awareness-level training module to key employees who are in regular contact with individuals who might be at risk of exploitation.

Primarily, the roles identified include team/line leaders and those involved in recruitment, accommodation, worker representation and other key managerial roles. To date, 568 people have received this training.

More substantial 'Modern Slavery for HR and Managers' training has also been delivered, either by the GLAA Academy or the G's Group Ethics Team. So far, 123 people have received this training.

1.2.2 Monitoring and Detection

Regular checks are conducted to identify indicators that can lead to a potential case of exploitation. Investigations are conducted upon any relevant finding.

Our training and capacity building programme continues to play an essential role, promoting the use of our reporting lines across our sites. This programme consciously sets "a low bar" for communicating any concerns to the business. These training modules have now been rolled out in our subsidiary in Spain.

In addition to our site and Group grievance mechanism, G's provides two channels to confidentially report any concern or suspicion. Internally, workers can contact the G's Group Ethics team via email or phone call. Externally, a multilingual anonymous 'Speak Up' platform is also available for reporting cases.

Significant numbers of 'flags' have been raised in 2019/20.

In 2020/21, further efforts will be made to continue embedding this system across the business in order to improve the reporting frequency.

Our modern slavery programme will be further rolled out in non-UK operations, increasing the number of individuals reached.

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 jeopardise any future criminal case.

1.3.1 Case Management

Clear avenues of reporting any issues of concern are effectively advertised. Investigations are independently led by G's Group Ethics team in coordination with the GLAA, and are based on recognised practices with regard to case preservation.

1.3.2 Victim Support

Site Champions are issued with guidance about how to manage any identified or suspected victim. This 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 National Referral Mechanism (NRM).

Individual situations are unique, so the primary purpose of the procedure is to establish a specific point of contact in order to meet with the individual and discover their particular needs.



In 2020/21, internal victim support guidance will be supplemented by formal procedures and case risk assessment tools.

1.4 Embedding

G's has a Group 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 within the site operations themselves, to improve ownership and effective policy development.

1.4.1 Policy Development

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. This group is consulted on relevant procedure development and on how procedures can best be implemented in all areas of a diverse business.

New procedures have been implemented in other European subsidiaries to standardise our management procedures across our international operations.

Regular benchmarking analyses were also carried out to monitor the successful implementation of our modern slavery policy framework in the UK. Each of our business units is benchmarked against modern slavery commitments. Improvements were identified in the areas set out below:

- Modern slavery training of worker representatives
- Representation of agency workers in site workers committees
- Regular spot surveys of agency workers

1.4.2 Site Champions

Site Champions received comprehensive training in recognising and supporting victims, they gained an in-depth understanding of the issues concerned.

In addition to providing awareness-level training on their site, they are responsible for driving forward the implementation of relevant procedures, and are equipped to react appropriately if a case of exploitation is found, both protecting the victim and safeguarding any potential criminal case.

Throughout 2019/20, the role of Site Champion has been reinforced within the UK businesses, as well as being expanded into non-UK operations. There are currently 20 trained Site Champions in the Group.

Site Champions are also authorised to deliver our Awareness Level Modern Slavery in-house training, after receiving a one-and-a-half day training course from the GLAA Academy.

In 2020/21 Benchmarking analysis will be further rolled out in non-UK operations.

In 2020/21, KPIs will be developed to monitor and ensure consistent application of these procedures across the Group. Further training will be arranged to maintain sufficient numbers of Site Champions across the Group.

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 2019/20.



2.1 Audit Methodology and Agency Capacity Building

In 2019/20, the Ethical team continued to audit all labour providers delivering a service to Group operations. The audit includes a specific framework to risk assess the systems used to prevent modern slavery.

During the COVID-19 crisis, our Labour Provider Ethical Audit Framework was rapidly adjusted. This has enabled us to uphold our due diligence standards, while complying with all safety guidelines issued by the respective national governments. Remote audit protocols were designed to conduct pre-supply ethical assessments and full ethical audits to any new labour providers.

All completed assessments feed into the KPI risk score for an agency. The agency is given feedback in the form of an action plan on how to reduce their risk score. Labour users are also informed of the risk score of their agency to aid their choice of agency, thus promoting the use of responsible agencies. In 2019/20, this system has been expanded from the UK into our Spanish operations.

In 2020/21, the modern slavery systems assessment will continue to be used to leverage improvement and will be updated with emerging risk/best practice.

Specific and useable audit tools and risk assessment for agencies in non-UK operations will continue to be refined.

2.2 Agency Worker Voice

Agency workers continue to be targeted as a priority during any ethical due diligence process. These workers are always interviewed at random while on site as part of the internal audit cycle.

All sites run multi-language “spot surveys” every season, which cover all agency workers on site.

During the COVID-19 crisis, existing reporting channels have been strengthened to improve their visibility within the agency workforce. New posters and additional supporting materials were developed to improve the communication of all existing reporting lines.

In 2020/21, further efforts will be made to improve communication with agency workers.

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, 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 Supplier Approval Procedure

All ethical due diligence requirements for suppliers are defined in the G's Fresh Supplier Approval procedure. In 2019/20, this procedure was reviewed and strengthened.

As a minimum requirement, all programmed suppliers are requested to be registered in the Supplier Ethical Data Exchange (SEDEX) and to have fully completed its new Self-Assessment Questionnaire (SAQ). Responses are monitored and assessed to identify indicators of risk of modern slavery.

During the first half of 2020, we successfully completed the new SEDEX SAQ, providing greater transparency to our customer base in, among other areas, supply chain management, monitoring systems or modern slavery management procedures.



In 2020/21, all programmed suppliers will be required to complete a specific modern slavery SAQ, designed to identify areas of potential risk of labour exploitation in our supply chain.

3.2 Supplementary Information regarding Modern Slavery Risks

Programmed fresh produce suppliers are requested to undertake a specific SAQ, designed to cross-check SEDEX SAQs, as well as highlight specific risk factors. These include factors relevant to modern slavery risk factors, such as recruitment practises.

Emergency/single use suppliers which do not have SEDEX are also risk assessed with the same specific SAQ or by them providing a GLOBAL G.A.P. Risk Assessment on Social Practice (GRASP) certificate. In 2019/20, 100% of our emergency supply base conformed with this requirement.

In 2020/21, additional efforts will be made to increase transparency in our GNFR (goods not for resale) supply chain. New risk assessment tools will be developed upon these findings to flag-up potential indicators of modern slavery.

3.3 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 60% of these suppliers have provided evidence of this to date.

We have remained an active contributor to various industry collaborative initiatives, sharing our knowledge and expertise with other suppliers. In the UK, G's actively participates in FNET work streams on forced labour and risk assessment. In Spain, we also participate in the "Spanish Forums for Ethical Trade" (SEFT), a stakeholder initiative launched in our main strategic sourcing area in the country.

Among other goals, this organisation provides training and capacity building to a large number of suppliers located in Southern Spain. In 2020, a working group led by G's published an ethical handbook for ethical management of labour providers. This handbook provides practical guidance on reducing the risk of labour exploitation by responsibly managing employment agencies within the agricultural sector.

In 2020/21, we will seek to increase the proportion of suppliers receiving modern slavery training in the UK. We will also seek to increase the awareness in this area in our wider non-UK supply chain.

This statement has been approved by John Shropshire, Chairman of G's Fresh on 2nd July 2020. It will be reviewed and updated annually.


