

# G's Modern Slavery Statement



## Letter from Guy Shropshire, G's Group CEO

Since March 2020, our business has faced incredibly challenging times due to the impact of the Covid 19 pandemic, and I am extremely proud of the tremendous lengths our teams have gone to in securing the safety of our colleagues and maintaining the food supply to our customers. During this period of uncertainty, we have continued with our commitment to maintaining human rights standards in the workplace. We are aware that the risks of exploitation grow in times of upheaval, yet our modern slavery and labour exploitation strategy, as well as our operations and supply chain management, proved to be dynamic, have sufficient capacity to adjust and remain agile.

In January, Brexit became a reality, bringing many new challenges to the business environment. G's employs a large seasonal workforce and immigration legislation was one of the most relevant changes. It is vital that the emerging system maintains or improves the protection of migrant workers. To this end, we have been closely monitoring the development of the Tier 5 Seasonal Worker Visa since its pilot phase, and contribute to multi-stakeholder working groups specifically focused on developing ethical good practice for both operators and labour users.

Over the last year, the G's independent Ethical team have scrutinised internal procedures and reviewed core policies and procedures, to be better prepared for the challenges ahead. Changes to our governance mechanism have improved our capacity to monitor and act on risks, while improving internal reporting systems. We have also launched our new ESG strategy, based on our three pillars; profit, people and planet.

Collaboration is pivotal in fighting modern slavery and there is a demonstrable appetite for engagement between industry stakeholders. G's contributes to initiatives such as FNET (Food Network for Ethical Trade) and SEFT (Spanish Ethical Trade Forums). A significant milestone this year was the launch of an 18-month pilot of the Modern Slavery Intelligence Network (MSIN), initially led by G's and M&S, and now involving several retailers and stakeholders within the food industry. It is my hope that this will prove to be a significant contribution to a shared and ongoing struggle to prevent modern slavery.



August 2021



**Scope of this Statement: Shropshire Group Structure**

The Shropshire Group is a group of market-led 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 Ltd
- 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 shared values and ethical treatment of those who work on our sites.

**Strategy and Statement Overview**

Our Modern Slavery and Exploitation strategy is based on four guiding principles:

- Prevention** - Robust systems
- Detection** - Widespread awareness and proper use of intelligence
- Case management** - Protecting victims and preserving integrity of legal cases
- Leadership** - Setting expectations for supply chains and sharing expertise

For ease of navigation this statement is organised into 6 main workstreams:

Prevention	1. Policy Framework
Detection	2. Training 3. Intelligence Management
Case Management	4. Survivor Care
Leadership	5. Supply Chain Management 6. Industry Collaboration

**1. Policy Framework**

Managing Directors of Shropshire group companies are responsible for managing modern slavery and exploitation risks within their businesses. Under the Shropshire group Corporate Governance Framework, each managing director is directly accountable to their company’s board of directors who meet on a quarterly basis to review and monitor risk and compliance alongside the evaluation of company performance. Managing Directors are supported by the group HR Director who is responsible for overseeing the group Ethics team and the implementation of ethical policies and procedures.

The group’s Risk Committee was established in December 2019 and meets on a quarterly basis and is chaired by the group Risk Director. The Committee is responsible for obtaining assurance that Shropshire group companies are taking a low-risk approach to ethical matters. The Committee receives and reviews reports on any breaches of risk limits and proposed actions in connection with ethical auditing by the Ethics team, a summary of the findings of the Risk Committee is reported to the SGMB quarterly.

The Shropshire group’s Corporate Governance Framework is owned and overseen by the Shropshire Group Management Board (“SGMB”), which is responsible for collectively advising on strategy development and implementation, whilst the Shropshire group companies are responsible for running and executing day to day operations. The SGMB has a two Non-Executive Directors one of whom is Chairman and its membership is of Directors representing the Shropshire group companies and central group functions.



## 1. Policy Framework (cont.)

The following policy framework underpins G's commitment to tackling modern slavery

Policy	Scope	Updates in 2020-21
Modern Slavery and Exploitation Policy (UK)	Shropshire Group UK Operations	Subsequent to extensive benchmarking and consultation, changes were put into effect to improve practicality of implementation. Additional emphasis was given to reporting channels and victim care responsibilities.
Modern Slavery Procedure (Spain)	Shropshire Group Spanish Operations	Introduction of standards regarding training, reporting (yellow flags), agency management, and case management. This procedure is based on practices successfully implemented in UK operations, adjusted to the specific cultural and operational context of our operations in Spain.
G's Statement on Prevention of Labour Exploitation, Modern Slavery and Human Trafficking	Shropshire Group Operations globally	This Statement outlines the general principles which govern the G's Group on this issue, and was formally endorsed by G's subsidiaries in Poland this year.
Survivor Care Standards for Employers	Shropshire Group UK Operations	A new document, superseding the Site Champions Handbook, this prepares employers to support survivors of trafficking through their journey to recovery.
Responsible Use of Labour Providers	Shropshire Group UK Operations	Update emphasises selection of low-risk agencies according to well-established KPIs.
Supplier approval process	Shropshire Group UK Operations	Key supplier approval documents were updated to reflect changes in industry best practise. In addition, risk assessment was amended to use new features of SEDEX Radar tool.
Ethical Trading Policy	Shropshire Group global operations	The policy has undertaken annual review.



## 2. Training

The goal of the G’s modern slavery training programme is to ensure that exploitation is detected, reported correctly, and any resulting case is managed in a responsible way to protect victims and improve the likelihood of prosecution.

*Modern Slavery Awareness* - The purpose of this module is to equip as many people as possible with an understanding of modern slavery, the potential indicators in the workplace, and clearly establish lines of reporting of any ‘yellow flags’. It is mandatory for colleagues directly managing teams of production operatives, employee committee representatives and other highly people-facing roles.

*Modern Slavery for HR and Managers* - This module ensures consistent implementation of the various company procedures designed to mitigate the risk of modern slavery, as well as developing an understanding of how they contribute.

*Modern Slavery for Site Champions* - At least two key Champions at each site are assigned the role of Site Champion. The purpose of this role is to implement internal training at scale, and assist the central ethics team with case management onsite. In addition to an understanding of labour exploitation in the UK context, the Site Champions receive training on case management and victim care.

Current training levels across UK operations:



### Case Study: ‘Responsible Recruitment’ training.

Internal Responsible Recruitment training was developed as a result of a benchmarking exercise across the group.

The benchmarking focused on sourcing, selection, hiring, onboarding, commitment to regular employment and responsible recruitment/management of agencies. It has been undertaken for two successive years and has resulted in several improvement projects. One such project emerged from findings in the benchmarking that a number of individuals from various roles are involved at various stages in the recruitment process. For many of these colleagues, recruitment is not their primary role, and they consequently had a low level of awareness of the ethical risks relating to recruitment.

An internal training module was developed with two key criteria in mind - it had to be accessible to the identified recipients who are none-specialists, and be delivered in an efficient way which could be embedded long-term within the business.

The key learning outcomes are; awareness of established processes for labour supply-chain due diligence, the nature and impact of recruitment fees, identifying and avoiding illicit recruitment intermediaries and proper reporting channels for modern slavery indicators.

The training will equip key people with practical measures they can take to reduce the risk of modern slavery in their operations.

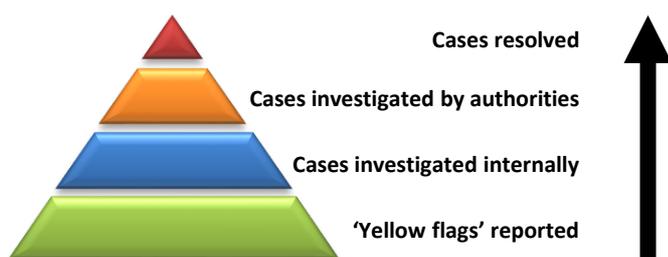


### 3. Intelligence Management

G's operates a 'yellow flag' system throughout its operations. The premise of this system is that many modern slavery indicators which colleagues spot in the workplace might in isolation seem insignificant. It is through reporting and investigating any such indicators, including those which might not turn out to be connected to a case of exploitation, that patterns can be established.

In addition to awareness training, clear reporting expectations ensure that intelligence is reported quickly, and utilised in the most effective way. This includes case management and investigation processes which are sensitive to the risk of jeopardising victim safety and legal cases.

The 'yellow flag' strategy relies on a high number of reports, and the 'Modern Slavery Champions' embedded at each site have proven to be an effective in maintaining report quantity and quality. To this end, a renewed focus on training more site champions has been implemented in 2021, and training focused on the importance of intelligence management.



### 4. Survivor Care

Decent employment has a crucial role in the recovery of many survivors of modern slavery and labour exploitation. Although many survivors access support through the national referral mechanism and/or through excellent services of the UK's many NGO's and legal practices, many are not able to or choose not to access these services.

G's has developed a handbook for employers entitled the 'survivor care standards for business'. This document draws on the many resources available relating to the care of victims, and summarises them in a way which is specifically aimed at managers and colleagues of survivors of trafficking.

The purpose of this document is to equip employers to act as an 'ally' of survivors of trafficking both in navigating the support which is available to them, and in their recovery process during employment.

The tool bridges a gap for capable and compassionate managers who are not experts in trafficking, slavery or aware of the complexities of working with extremely vulnerable people. It demonstrates how the advice offered by NGOs regarding victim care can be applied to an employment relationship.

The contents are;

- Understanding and navigating the National Referral Mechanism
- Trauma-informed care
- Designing a recovery plan
- Sensitivity and empowerment in survivor care management



## Case Study:

### Modern Slavery Intelligence Network

In 2020, G's co-founded the Modern Slavery Intelligence Network (MSIN), a non-profit collaboration between a limited membership of companies in the UK food sector. Its purpose is to develop a structured intelligence sharing mechanism between its members which will enhance the effectiveness of their contribution to the disruption of modern slavery and labour exploitation practises. Members are aware of the sensitivity of intelligence relating to exploitation and modern slavery and, in coordination with relevant authorities, care is being taken to establish clear processes which do not undermine official investigation or harm potential victims.

The premises of forming an information sharing mechanism between private companies are twofold; firstly the presumption that in some cases, unsubstantiated evidence, when collated from multiple sources, may become actionable by investigative authorities. Secondly, it empowers those private companies who wish to tackle exploitative practises which are not of interest to investigative authorities, for example where they are not considered to constitute modern slavery or other legal breach.

The Network is currently undertaking an 18 month pilot to assess the impact of the Network and its effectiveness in achieving its stated goals. This will inform the structure of MSIN in the future.



## 5. Supply Chain - due diligence

G's is primarily a producer business but uses third-party suppliers from 25 countries to ensure a consistent supply of quality produce throughout the year.

Our top 10 sourcing countries by gross sales value during the financial year 2020/21 were:

*UK, Spain, Senegal, Egypt, Morocco, Italy, Poland, Germany, Netherlands, Portugal.* Senegal, Egypt, Morocco and Italy have been identified through our risk assessment as higher-risk sourcing locations.



All ethical due diligence requirements for suppliers are defined in the G's Fresh Supplier Approval procedure and all suppliers receive a suppliers pack containing detailed ethical requirements. In 2020/21, the pack was reviewed and updated to reflect changes in industry best practice. For example, selected suppliers and growers based in Spain will be asked to undergo forced labour training with Stronger Together.

As a minimum requirement, all programmed suppliers must register in the Supplier Ethical Data Exchange (SEDEX) and to complete its new Self-Assessment Questionnaire (SAQ);

providing greater transparency, improved supply chain management and monitoring systems. Responses are monitored and assessed with aid of the SEDEX Radar tool which supports identification of suppliers operating in high-risk environments or with workers more vulnerable to labour exploitation.

In 2021/22 we will continue to screen the produce supply chain through our risk assessment, recently amended to facilitate new features of SEDEX Radar tool, including Forced labour risk developed by Ergon Associates. This comprehensive risk assessment enables us to prioritise activities and resources where the risk is highest.

The new comprehensive SEDEX SAQ covers aspects relating to modern slavery risks and means our programmed fresh produce suppliers are no longer requested to undertake the G's specific SAQ. However, we continue requesting emergency/single use suppliers, which do not have SEDEX, to be risk assessed with by via provision of a GLOBAL G.A.P. Risk Assessment on Social Practice (GRASP) certificate. In 2020/21, 100% of the G's emergency supply base conformed with this requirement.

We have made efforts to increase transparency in our GNFR (goods not for resale) supply chain and have identified several higher risk categories; waste and recycling sector, PPE suppliers and logistics where we would like to prioritise our activities.

In 2021/22 we will work with our strategic GNFR suppliers from the higher-risk areas to identify potential actions needed to protect vulnerable workers.



## 6. Industry Engagement

It is impossible to tackle modern slavery without collaboration across industry and between government, business and the third sector. The Shropshire Group engages in multiple industry collaborations relating to human rights in business, and is a member of the Food Network for Ethical Trade, the Spanish Ethical Trade Forums and the Modern Slavery Intelligence Network amongst others. In 2020-21, the following project outcomes are notable:

### Case Study: *Labour Provider Due Diligence Checklist (Spanish Ethical Trade Forums)*

The Ethical Trade Forums were officially launched in 2015 with the aim of creating a safe space where growers, importers and retailers could share experiences and discuss openly some of the main challenges the food industry faces in Spain. The impact of this project in the Spanish agricultural industry has been remarkable thanks to the continuous awareness campaigns and the promotion of ethical working conditions in the country.

G’s coordinates the Murcia Working Group. Murcia has one of the highest proportions of temporary workers in Spain, and improving controls and oversight of agencies is a priority for reducing the risk of labour exploitation. Within the Working Group, G’s has led the development of an ethical handbook and assessment checklist for the responsible use of labour providers, published in March 2021.

The handbook and checklist allow small farmers and large agricultural companies alike to evaluate labour providers against standards of good practice and compliance. The documents are the first of their kind in Spain, and since they are open-access, will provide a foundation for increasing the standards of labour agencies in the region as a whole, the most effective way to reduce risk in this context.



### Case study: *Forced Labour. Guide: how to recognise it and counteract it (Polish Working Group on Workers)*

Since 2018, G’s has been a member of a working group created by the Polish Ministry of Investment and Development, alongside key national stakeholders such as the Polish Institute for Human Rights and Business, National Labour Inspectorate, the All-Poland Alliance of Trade Unions and representatives of different agencies of the government, companies and organisations representing them

In October 2020 the first project of the working group has come to life when the publication “*Forced Labour. Guide: how to recognise it and counteract it*”, was launched in the largest CSR event in Poland. The guide contains practical tools: the initial assessment of the risk of forced labour, employee surveys, information leaflets, checklists or guidelines for conducting audits.

As a result, the handbook will be useful for organisations wishing to protect themselves against the risk of forced labour. It will also facilitate the introduction of specific procedures in the field of preventing forced labour and will help to detect possible cases of forced labour and take appropriate steps in such a situation.



## 2020-2021 Targets Update

Target 2020/21	KPI	Commentary	Target 2021/22
<b>Training</b>			
The core internal training requirements mandated by the G's Modern Slavery Policy UK will be maintained.	There are currently 424 UK based colleagues trained in modern slavery awareness, 96 in Modern Slavery for HR/Managers and 17 Site Champions.	The number of individuals trained as Site Champions has dropped slightly due to staff turnover.	To maintain training levels and identify and train new site champions.
The Responsible Recruitment training module will be brought within the learning management system requirements and delivered to more colleagues.	143 additional colleagues were identified as requiring this training, to date 16 have done so (11%).	The delivery of this training module is underway.	To ensure all those identified complete the training.
The modern slavery training programme will continue to be expanded in non-UK operations, increasing the number of roles reached.	27 individuals were trained in Spanish operations and 21 in Polish operations.	The training will continue to be rolled out in non-UK operations.	To be revisited in 2020-21
<b>Intelligence Management</b>			
In 2020/21, KPIs will be developed to monitor 'yellow flag' reporting and ensure consistent application across the group.	A KPI was developed which showed variation across the group and some reduction in overall numbers in 2020-21.	Yellow flag reporting is still strong.	Active and regular communication to Site Champions.
Specific and useable audit tools and risk assessment for agencies in non-UK operations will continue be refined.	All Spanish and UK labour providers are now assessed using the tool	The risk assessment tool is now available internally for selection of agencies.	Polish agencies will be brought into the tool
<b>Survivor Care</b>			
In 2020/21, internal victim support guidance will be supplemented by formal procedures and case risk assessment tools.	N/A	Practical guidance relevant to the employment context has been developed and circulated internally.	The guidance will be refined and improved, with a goal of developing an industry standard in this area.

## 2020-2021 Targets Update (Continued)

Target 2020/21	KPI	Commentary	Target 2021/22
<b>Supply Chain Due Diligence</b>			
In 2020/21, Recruitment Risk Assessments and internal Modern Slavery Prevention Systems Benchmarking will continue to be expanded in our non-UK operations	In Polish subsidiaries, the modern slavery systems benchmarking assessment were undertaken at all business units (two in total).  In Spain, both modern slavery systems benchmarking assessments and responsible recruitment assessments were conducted at all business units (nine in total).	The process provided new insights and enabled useful action plans.	Continued extension of these tools in non-UK subsidiaries.
In 2020/21 all programmed suppliers will be required to complete a specific Modern Slavery SAQ	100% completion	The updated SEDEX SAQ and risk assessment renders this SAQ obsolete.	Specific programmes of engagement with high-risk programmed suppliers will replace SAQ.
In 2020/21, additional efforts will be made to increase transparency in our GNFR (good not for resale) supply chain.	Full mapping exercise undertaken to determine priority areas.	Assessment tools are needed which are tailored to targeted industries - key areas are waste management, PPE and haulage/logistics.	Assessments and strategy in place for targeted GNFR suppliers.
In 2020/21, we will seek to increase the proportion of suppliers undertaking modern slavery training in the UK.	91% completion	Modern slavery training requirements have also been extended to Spanish suppliers.	Specific programmes of engagement with high-risk programmed suppliers outside the UK will identify training opportunities.
<b>Engagement/Leadership</b>			
A need has been identified to form an intelligence sharing network within the food industry, to improve detection.	Initial core membership of the Modern Slavery Intelligence Network (MSIN) established and an 18 month pilot is underway.	Pilot underway, to determine structure and effectiveness in meeting goals going forward.	To successfully complete pilot phase.