

MODERN SLAVERY STATEMENT



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STATEMENT FROM OUR CHAIRMAN

Modern slavery continues to be one of the most abhorrent crimes of current times, it is a crime that continues to be appealing to criminals all over the world. The Global Slavery index estimates there are currently 49.6 million people living in modern slavery, this is a reported increase of 10 million people since 2016.

“Modern Slavery” is not a phrase you would associate with the UK, if asked, most people would say “slavery ended years ago” and “it’s not happening in the UK”. However, the latest government information confirms there were 16,938 potential victims of modern slavery referred to the Home Office in 2022. This represents a 33% increase when compared to the preceding year and is the highest annual numbers since National Referral Mechanism began (2009).

G’s is committed to doing everything it can to mitigate risks of modern slavery to our workers, we will uphold the principles of human rights and ethical business practices. We recognise that modern slavery and human trafficking are very serious crimes, and we are dedicated to ensuring that our operations and supply chains are free from such practices. It is a necessity that all workers within our supply chain are treated with respect and dignity and are free from threats, intimidation, and exploitation.

We are aware this is an ever-evolving crime, and its nature is complex and ever changing, we are committed to: innovation, continuous improvement, collaboration, and widening our engagement with experts who add value and provide detail that will reduce the risk of modern slavery for all workers in our supply chain. We will continue to promote a “speak up” culture within our businesses, we recognise the impact a worker’s voice can have if they are listened to.

This Modern Slavery Statement summarises the steps we have taken so far to prevent modern slavery, exploitation and human trafficking and outlines our commitments for the ensuing year.



John Shropshire
Executive Chairman, G’s Group



STRUCTURE & OVERVIEW

The G's 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
- G. S. Shropshire & Sons Limited
- J. B Shropshire & Sons Limited
- Sandfields Farms Limited

Today we supply all the major UK retailers and many in Europe with fresh salads, vegetables and prepared produce. Across the Group, 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.

This is underpinned by our business values:

TRUST - Be a great place to work where openness, respect and teamwork are encouraged, in a safe, ethical environment.

EFFICIENCY - Be a highly effective, lean and fast-moving organisation from seed to shelf.

QUALITY - Provide outstanding quality and service to our colleagues and customers.

EXPERTISE - Be the experts in our field and never stop learning.

CAN-DO - Be committed and driven in our continuous endeavour to adapt and improve.

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

PREVENTION	1. POLICY FRAMEWORK
DETECTION	2. AUDIT FRAMEWORK - DUE DILIGENCE & RESPONSIBLE RECRUITMENT 3. TRAINING/AWARENESS RAISING & CAPACITY BUILDING 4. INTELLIGENCE MANAGEMENT
CASE MANAGEMENT	5. SURVIVOR CARE
LEADERSHIP	6. SUPPLY CHAIN MANAGEMENT & DUE DILIGENCE 7. LEADERSHIP & INDUSTRY ENGAGEMENT

1. POLICY FRAMEWORK

OUR POLICY FRAMEWORK UNDERPINS THE GROUP'S COMMITMENT TO TACKLING MODERN SLAVERY AND IS REGULARLY REVIEWED AND IMPROVED TO CONTINUE ENHANCING DUE DILIGENCE AND MAINTAINING HIGH STANDARDS.

HUMAN RIGHTS POLICY

Launched in 2021, our new human rights policy sets out our commitment to respecting human rights in line with principles and standards set out by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Ethical Trading Initiative Base Code (ETI Base Code) and International Labour Organisation (ILO) Conventions. This provides the overarching supporting structure within which other policies relating to modern slavery and labour exploitation sit. It clearly communicates the standards we expect in our direct and indirect supply chains.

MODERN SLAVERY AND HIDDEN EXPLOITATION

Our Modern Slavery and Hidden Exploitation Policy for UK operations outlines the measures in place to prevent modern slavery and exploitation in the following areas: recruitment and onboarding, training, detection and monitoring, case management and victim support, labour providers, banking and pay, and customer facing roles. We have based our Modern Slavery Procedure for Spanish operations on practices successfully implemented in the UK and adjusted them to the specific cultural and operational context of our operations in Spain. These regularly undergo benchmarking to improve practicability of implementation. For global operations, the G's Statement on the Prevention of Labour Exploitation, Modern Slavery and Human Trafficking outlines the general principles held by the Shropshire Group on this issue. It also outlines specific areas of high risk which should concern businesses in their efforts to adhere to these principles, such as recruitment intermediaries and costs, including debts and loans.

RESPONSIBLE USE OF LABOUR PROVIDERS POLICY

For our UK operations, we have a structured labour provider management procedure to ensure that all labour providers are fully risk assessed to identify potential risks of labour exploitation or breaches of company standards and commitments. This also sets out a framework for the implementation of a robust management system, including specific due diligence requirements tailored to the relationship between the Labour Provider and Labour User. This year we have continued to emphasise selection of low-risk agencies, according to well established KPIs.

WHISTLEBLOWING & POLICY

The Whistleblowing policy defines our commitment to the highest possible standards of openness and accountability. Amongst multiple grievance mechanisms, we provide access to an external confidential reporting service, 'Speak Up' and, we encourage all workers to report any concerns they have. The service is available in several languages supported by multiple access methods and a follow up option, anonymously if preferred.

ETHICAL TRADING POLICY

We are committed to implementing and enforcing effective systems and controls to prevent modern slavery and human trafficking throughout our supply chain. As a responsible business, we are committed to working to the principles and standards of the ETI Base Code and ensuring the fair treatment of its workers and those in its direct supply chain. The Ethical Trading Policy outlines the requirements for our suppliers, in alignment with the ETI Base Code. We ensure that our suppliers are continuously assessed against these principles and our activities are focused where the risk is highest.

2. AUDIT FRAMEWORK

DUE DILIGENCE AND RESPONSIBLE RECRUITMENT

Effective management of the business units across the Group as well as its Labour Supply Chain is paramount to ensuring not only compliance but consistent and effective management and best practice.

When we establish a business relationship with a labour provider, we ensure that they have a Gangmasters and Labour Abuse Authority (GLAA) licence and follow the provisions of the Gangmasters (Licensing) Act 2004 and the Immigration Act 2016. The role of the GLAA is to protect vulnerable and exploited workers, we believe that by continuing to work in partnership with the authority, adds insight, depth, and knowledge of industry issues that we would otherwise be unaware of.

The Group's business units undergo internal ethical audits to ensure compliance and maintenance of our standards for the conditions of our workers. The audit framework compares systems against ETI Base code, employment law and G's policies. All businesses will be provided an action plan and a modern slavery benchmarking score. This enables each individual business to work with the ethics team to complete remedial actions and work together to develop best practice initiatives.

The greatest risk of modern slavery in our business is in recruitment processes. Labour provider management is core to building responsible recruitment processes. A critical area of this is the labour supply audit methodology and agency capacity building.

The purpose of our responsible recruitment strategy is to have a documented and structured labour provider management procedure to ensure that all labour providers are fully risk assessed to identify potential areas of risk of labour exploitation or breaches of company standards & commitments and GLAA Licensing Standards.

All labour providers are audited twice per year and recruitment streams fully mapped to ensure robust, specific due diligence is carried out.

CASE STUDY: RESPONSIBLE RECRUITMENT IN SPAIN

Responsible recruitment into our business units is a crucial practice at G's.

In our Spanish operations, we conduct additional due diligence to ensure responsible recruitment occurs. New employees are required to register their voice with an initial recording for the checkVox voice recognition system. It is a voice biometric identification system that can identify a worker's identity. When workers start their shift, supervisors will use the app to identify the worker by their employee number and the worker must speak into the app. This will clock them into their shift by confirming their identity. They will then repeat this when clocking out of their shift as well. The app confirms or denies the voice matches the original recording.

This system can also help produce KPI reports for absenteeism and verification of payroll hours. The implementation of this system ensures an enhancement of recruitment and onboarding processes to strengthen compliance and worker welfare.

3. TRAINING/AWARENESS

RAISING & CAPACITY BUILDING

Our modern slavery training programme has been designed to build awareness and understanding of labour exploitation and modern slavery risks and indicators across the Group. By consistently driving capacity building, we continually develop the right skills and knowledge to ensure that any indicators are detected as early as possible and reported efficiently and correctly.

The nature of modern slavery and exploitation is constantly evolving and by reviewing and updating our training materials regularly, we can ensure that, as much as possible, we mitigate risk, protect people and responsibly manage any resulting case sensitively and effectively.

Our training programme is made up of 5 modules, each aimed at further developing colleagues' knowledge and ability to act appropriately and support effective resolution.

INDUCTION LEVEL ETHICS TRAINING

All colleagues complete basic Ethics Training at induction level. For permanent colleagues, this module provides an overview of the Ethics Department and its functions and initiatives including Ethics and Human Rights at G's, ETI Basecode, the ILO and the UNGPs which underpin our strategy as well as intelligence management and grievance mechanisms and basic modern slavery awareness. For our seasonal colleagues, information on workers' rights, grievance mechanisms and modern slavery indicators are included at induction, as well as an introduction to the Ethics Team.

MODERN SLAVERY AWARENESS

The purpose of this module is to build a clear understanding of modern slavery and potential indicators with as many colleagues as possible, and clearly communicate correct lines of reporting any 'yellow flags'.

LEVEL 2: MODERN SLAVERY & RESPONSIBLE RECRUITMENT

This module has been developed to ensure consistent implementation of various recruitment procedures by building an understanding of the nature and impact of risks during recruitment, identifying, and avoiding illicit recruitment practices and intermediaries and other potential risks throughout our operations.

LEVEL 3: MODERN SLAVERY – ADVANCED

This is our most in-depth module of modern slavery training, specifically aimed at key colleagues who have direct reports and people facing responsibilities, HR and colleagues who work within our accommodation sites and welfare areas. This module contains examples and case studies and includes interactive activities where attendees can demonstrate their understanding and build experience of dealing with a case in a safe and supportive environment.

MODERN SLAVERY FOR SITE CHAMPIONS

Each site is required to nominate a minimum of two Site Champions specifically developed to assist the central ethics team with driving awareness, identification, reporting and case management on site. The training focuses on the role of the site champion and an in-depth understanding of labour exploitation in the UK context, supported by regular engagement.

5. INTELLIGENCE MANAGEMENT

A key contributor to our modern slavery & hidden exploitation strategy across the Group is a 'yellow flag' system. The premise of this system, following on from modern slavery awareness & reporting training, is to ensure that any modern slavery indicators which may be observed, overheard, or noticed in the workplace are reported and investigated without delay.

In addition to the delivery of Modern Slavery Awareness & Reporting Training, we ensure clear expectations and due diligence in regard to utilising every item of information in the most efficient and valuable way. This includes Case Management and investigative processes centred around victim safety and legal cases.

The Yellow Flag system relies on high level reporting to be truly effective. A new reporting structure has enabled us to cross check key details quickly for historical reports and identify trends, risks and escalate to the appropriate authorities where appropriate.

We are also able to identify what areas of the business are showing higher risk and enable us to respond accurately to mitigate risk and improve our systems. Site Champions are embedded at each site ensuring awareness and reporting are kept as an important daily focus and contributes to maintaining report quality and quantity.

The yellow flag system is reviewed annually to ensure effectiveness and monitoring are paramount in detecting and disrupting modern slavery and exploitation risks across the Group, as well as driving emphasis on the importance of intelligence management.

CASE STUDY – RECRUITMENT FEES REPORTING TOOL

To mitigate against the risk of modern slavery and exploitation within our recruitment streams, we conduct regular recruitment and labour provider reviews. The information gathered is used to update and inform our risk assessment protocol, which is a key tool to ensure we are identifying and managing any potential risks of modern slavery.

Following the war in Ukraine, and subsequent changes to recruitment, all recruitment streams mapping was revised and updated. To ensure we had complete transparency throughout the recruitment process, research was conducted on visa conditions, costs and in country processes for each source country in the Seasonal Worker Scheme. The aim was to improve our understanding of country specific risks, enabling us to enhance and provide a more effective due diligence process. To safeguard our processes, a new reporting tool was created with the objective of identifying all recruitments streams and costs seasonal workers arriving may have experienced. For the 2023 season, a revised protocol has been established for worker interviews and investigations, providing additional information that enhances our understanding of the recruitment routes our seasonal workers use.

This tool has created a methodology for conducting in-depth labour provider assessments by incorporating worker's experiences. It provides increased exposure to information that has not been captured before, enabling our businesses to go beyond reliance on standard auditing practices. It also provides valuable data for risk assessing different factors within the recruitment process such as costs, agencies, and additional factors within sourcing countries.

The tool will contribute to our yellow flag reporting system and central reporting matrix. With more detailed information, it will enable the business to react more effectively to potential cases of exploitation within recruitment streams. It will support the future mapping of recruitment plans and the continuing development of best practice around labour sourcing and worker welfare.

6. SURVIVOR CARE

Whilst there are various support avenues available through government mechanisms and other excellent services of the UK's many NGOs and legal practices, some survivors of modern slavery and/or exploitation may choose not or find it difficult to access these services.

Decent employment plays a crucial role in the recovery of many survivors as having stability and support can be a proactive component in the recovery process.

Practical guidance and support for employers, particularly those in people facing and people responsibility roles is key in supporting effective and appropriate care.

This can be accessed via our Survivor Care Standards for Business Handbook.

This draws on extensive resources and advice relating to the care of victims. It also highlights the significant and unique role that responsible employment can play in the recovery and development of survivors.

The purpose of this document is to equip employers to act as an 'ally' for survivors of trafficking by understanding the support which is available to them and being prepared for their recovery process during employment.

The handbook covers the following topics:

- **UNDERSTANDING AND NAVIGATING GOVERNMENT SUPPORT.**
- **TRAUMA-INFORMED CARE.**
- **DESIGNING A RECOVERY PLAN.**
- **SENSITIVITY AND EMPOWERMENT IN SURVIVOR CARE MANAGEMENT.**



7. SUPPLY CHAIN MANAGEMENT & DUE DILIGENCE

G's is primarily a producer business but uses third-party suppliers from 14 countries to ensure a consistent supply of quality produce throughout the year. Our top 5 sourcing countries by gross sales value during the financial year 2022/23 were: UK, Spain, Senegal, Egypt and Poland.

All ethical due diligence requirements for suppliers are defined in the G's Fresh Supplier Approval Procedure and all suppliers receive a supplier's pack containing detailed ethical requirements. In 2022/23, we made further amendments to the pack to reflect changes in industry best practice in line with current industry risks.

As a baseline, all programmed suppliers must register on the Supplier Ethical Data Exchange (SEDEX) and complete their Self-Assessment Questionnaire (SAQ) to provide greater transparency, improved supply chain management and monitoring of systems. SAQ responses are monitored and assessed with the support of the SEDEX Radar tool, which supports identifying suppliers operating in high-risk working environments and those more vulnerable to labour exploitation. Additionally, based on audit data, all suppliers are screened using the SEDEX Forced Labour Indicators tool; highlighting where potential indicators of forced labour have been identified within our supply chain. We also ensure that all non-compliances and observations raised during audits at supplier sites are accordingly addressed in a timely matter.

Higher risk countries and suppliers have been identified through our risk assessment which requires relevant extra due diligence. Suppliers from Senegal, Egypt and Morocco have regular SMETA audits in place, where results are being closely monitored to ensure any issues identified are resolved within relevant timescale. All suppliers with supply chains that have a higher potential risk of forced labour have been requested to undergo forced labour training.

In 2023/24 we will continue to screen the produce supply chain through our risk assessment and update our tool after assessing the change to SEDEX's SAQ that is planned for implementation in the upcoming year.



We have made efforts to increase transparency in our goods not for resale (GNFR) supply chain and have identified several higher risk categories: waste and recycling sector, PPE suppliers and logistics, where we have prioritised our activities. The key suppliers in those categories have been requested to either register on SEDEX, complete G's specific ethical SAQ or undergo G's internal audit covering aspects relating to modern slavery risks. In 2023/24 we will continue to work with our strategic GNFR suppliers from the higher risk areas to identify potential actions needed to protect vulnerable workers as well as expanding the scope of our risk assessment.

8. LEADERSHIP & INDUSTRY ENGAGEMENT

DETECTING AND DISRUPTING MODERN SLAVERY INVOLVES COLLECTIVE ACTION AND COLLABORATION ACROSS INDUSTRY AND BETWEEN GOVERNMENT, BUSINESS AND THE THIRD SECTOR. WE ARE COMMITTED TO AND ACTIVELY ENGAGED WITHIN MULTIPLE COLLABORATIVE GROUPS ACROSS THE INDUSTRY, CONTRIBUTING AND SHARING PRACTICES. SUCH COLLABORATIVE BODIES INCLUDE THE FOOD NETWORK FOR ETHICAL TRADE (FNET), THE SPANISH ETHICAL TRADE FORUMS AND THE MODERN SLAVERY INTELLIGENCE NETWORK (MSIN).

CASE STUDY – MSIN CONFERENCE

The Modern Slavery Intelligence Network (MSIN) is a pioneering non-profit organisation encompassing the UK food sector and agriculture supply chains. MSIN has been developed as an intelligence sharing network between members, with the aim to enhance cross sector collaboration to disrupt modern slavery and labour exploitation.

During 2022, the systems, governance and legal structures which underpin and enable data sharing within the network were fully established. Stop the Traffik was appointed data sharing partner and analyst, and the MSIN intelligence sharing platform was launched. In March 2022 beta testing of intelligence sharing began with G's as test user. Since then, we have submitted multiple cases of intelligence discovered via the Yellow Flag system.

MSIN was formally launched in June 2022 with an industry conference hosted at G's. The conference was attended by over 200 representatives from across the food processing, farming and horticulture industry, retailers, NGOs, and law enforcement. The keynote speech was delivered by Dame Sara Thornton, former Independent Anti-Slavery Commissioner.

Key outcomes of the conference centred around inspiring discussions related to:

EMERGING RISKS AFFECTING THE SECTOR.

REVIEW OF THE MSIN PILOT.

ADDRESSING LABOUR EXPLOITATION AND MODERN SLAVERY NOW AND, IN THE FUTURE.

PROACTIVE POSSIBILITIES FOR THE INDUSTRY TO ADDRESS SYSTEMIC LABOUR CHALLENGES.

IN 2023, MSIN WILL CONTINUE TO PLAY A KEY ROLE IN OUR OVERALL STRATEGY FOR IDENTIFYING, MITIGATING, AND PREVENTING MODERN SLAVERY WITHIN THE UK.

COMMITMENTS UPDATE

We continually monitor and review the effectiveness of our processes and actions through key performance indicators related to modern slavery, labour exploitation and supply chain due diligence. These are updated on a regular basis and we are proud to say that we have achieved seven targets to strengthen our approach, and working to achieve the remaining four targets over the course of the year. For full transparency, we have included an update on progress for each target with details on what we said we would do in 2021-22 and what we have done to achieve it.

COMMITMENT 2022/23	OUTCOME	
TRAINING		
The Modern Slavery Training Programme in the UK will be reviewed, and training requirements scope expanded to drive ethical working, modern slavery awareness and reporting of yellow flags.	44 Site Champions were required to be nominated and undergo Site Champion Training. In total, 56 champions were nominated and completed the programme. There has been an increase year on year of 50% completed in 2021, 88% completed in 2022 and 164% in 2023.	
Continued expansion of our training programmes in non-UK operations, adding new stakeholders and/or increasing the scope of materials	We have successfully completed our training programme to 268 colleagues (95% of those required) in our Spanish operations and 17 (100% of those required) in our Polish operations. The new Responsible recruitment training module as well as additional workshop on G's grievance channels were delivered to key personnel in Poland.	
INTELLIGENCE MANAGEMENT		
The yellow flag reporting framework was reviewed and enhanced to enable efficient cross-checking, trend identification, risk assessment and analysis and escalation processes.	Yellow Flag reporting will continue to be developed and reported on to ensure effectiveness and monitoring are supporting the G's high standards and increase updates to key stakeholders across the business.	
Continued review and updates of audit and risk assessment tools for agencies in UK and non-UK operations	We have continued to refine our audit tools and achieved 80% completion of assessments for Polish agencies.	
SURVIVOR CARE		
Survivor care Guidance has been included in the reviewed and enhanced modern slavery training and incorporated into modern slavery site champions handbook.	Guidance will continue to be reviewed and enhanced with a goal of developing an industry standard in this area.	
SUPPLY CHAIN		
Recruitment Risk Assessments and internal Modern Slavery Prevention Systems Benchmarking will continue to be expanded in our non-UK operations.	100% of our Spanish and Polish business units have been risk assessed and benchmarked.	
Improvement of specific programmes of engagement with high-risk suppliers outside the UK, which can then be used to identify new training opportunities.	163 programmed produce suppliers were required to undertake Modern Slavery training, 150 have had it so far (92%); 48 suppliers were requested to attend Stronger Together training, 47 have attended (98%). All key suppliers in Spain attend Spanish Ethical Trade Forum events on regular basis.	
ENGAGEMENT & LEADERSHIP		
G's, along with other MSIN members, successfully completed the pilot phase and hosted a conference to formally launch the network within industry.	G's has continued to successfully participate in MSIN and contribute to intelligence sharing.	

TARGETS 2023/24

Over the next year, we will build on the progress we have made and continue to uphold our commitment to addressing modern slavery and labour exploitation within a wider human rights framework. In particular, the focus and targets for 2023-24 will include:

CONTINUED EXPANSION OF OUR TRAINING PROGRAMMES, ADDING NEW STAKEHOLDERS AND INCREASING THE SCOPE OF MATERIALS.

INCREASED COMMUNICATION WITH SITE CHAMPIONS TO INCLUDE REGULAR UPDATES AND REFRESHER TRAINING.

CONTINUED REVIEW AND UPDATES OF AUDIT AND RISK ASSESSMENT TOOLS FOR AGENCIES IN UK AND NON-UK OPERATIONS.

CONTINUE TO FULLY MAP RECRUITMENT STREAMS AND CONTINUE TO DEVELOP AGENCY AND SOURCE COUNTRY RISK ASSESSMENTS TO PROTECT WORKERS AND INFORM RESPONSIBLE RECRUITMENT LABOUR PLANS.

LAUNCH OF JUST GOOD WORK APP ACROSS UK OPERATIONS.

ADDITIONAL EFFORTS WILL BE MADE TO INCREASE TRANSPARENCY IN OUR GNFR (GOOD NOT FOR RESALE) SUPPLY CHAIN.

AUDITING SPANISH PARTNERS WITH LABOUR. TRAINING TO ALL WORKERS ON MODERN SLAVERY INDICATORS AND SPEAK UP CHANNEL.