



G's Group Modern Slavery Statement

2023/2024

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.

G's is committed to doing everything it can to mitigate the 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 details 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.

Structure & Overview

Established in 1952, G's Group is a group of market-led farming and food processing businesses. This Statement concerns all companies within this Group. These companies are as follows:

- Barway Services Limited
- Cambs Farms Growers Ltd
- GCH Growers Ltd
- East Coast Growers Ltd
- 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

Governance

This statement is made in accordance with Section 54 of the Act. It details each G's entity to which this statement applies, and the steps taken during the reporting period. This statement, will continue to be subject to annual review, has been reviewed senior management. Overall responsibility for modern slavery sits with the Boards and our Modern Slavery Statement is approved by our Chairman.

Our policies

The Group is committed to tackling modern slavery, we endeavour to have policies that are visionary and creative and drive continuous improvement.

We recognise that Modern Slavery is not a "static" crime, criminals are creative and will constantly hone their illicit tactics. To counter this, our modern slavery policies are regularly reviewed and improved, and our procedures will continue to be enhanced.

Human Rights Policy

Our human rights policy sets out our commitment to respecting human rights in line with the principles 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 policy is the supporting structure accompanying our policies relating to modern slavery and labour exploitation. It clearly communicates the standards we expect in our direct and indirect supply chains.

Responsible Use of Labour Providers Policy

This policy sets out a framework for the implementation of a robust management system, including specific audit and due diligence requirements, the relationship between the Labour Provider and Labour User.

We have a structured procedure for labour provider management. All labour providers are fully risk assessed to identify the potential of:

1. labour exploitation
2. breaches of relevant standards.

The Prevention of Labour Exploitation, modern Slavery and Human Trafficking Policy

G's operates worldwide, the Prevention of Labour Exploitation, Modern Slavery and Human Trafficking policies defines the principles held by the G's Group, it is immaterial which country a specific business is operating in.

This policy outlines the measures in place to prevent modern slavery and exploitation in the following areas: recruitment and onboarding, training, detection, monitoring, case management and victim support.

Whistleblowing & Speak Up Policy

Encourages colleagues to speak up if they have concerns relating to their employment at G's. Whether a colleague is employed direct or not, they all have access to a number of grievance mechanisms. We provide access to an external confidential reporting service, 'Speak Up' and, we encourage all workers to report any concerns, anonymously if preferred, they have. The service is available in several languages supported by multiple access methods and a follow up option.

Ethical Trading Policy

This Policy defines our expectations and requirements suppliers must achieve. We are committed to implementing and enforcing effective systems and controls to prevent modern slavery and human trafficking throughout our supply chain. All suppliers are risk assessed and approved prior to commencement of supply. Full visibility and transparency are ensured through end-to-end mapping of our supply chain.

Assessing and Managing Risk

Risks relating to modern slavery for colleagues working at G's and the wider supply chain are managed primarily through our policies and processes outlined above.

We have proven strategies in place to ensure that workers are treated fairly, with initiatives to address the evolving risks of modern slavery.

Seasonal workers are now recruited from a much wider range of countries, presenting different Labour exploitation risks and complexities of scheme rules and visa schemes. Therefore, we need to be even more diligent to ensure vulnerable workers are not being exploited.

Our processes for managing modern slavery and Labour exploitation risks are detailed below.

Information gathering – Yellow flag system

The Yellow Flag system relies on a high number of issues being reported, if it is to be truly effective. The premise of this system is to ensure that any modern slavery indicators which may be observed, overheard, or noticed in the workplace are reported and investigated.

Any information reported is recorded and added to the central intelligence matrix. Each piece of information received is assessed, issued with a criticality rating and the next steps of the investigation are agreed.

Modern Slavery Intelligence Network (MSIN)

We are founder members of MSIN - a pioneering non-profit collaboration in the UK food sector that was created in 2020 in response to the findings of Operation Fort (the UK's largest ever modern slavery investigation). Its aim is to share intelligence across the UK's food industry to understand patterns and trends of modern slavery and use these to disrupt traffickers.

During 2023, MSIN has continued to grow its membership and work with data sharing partner, Stop the Traffik, to run the MSIN intelligence sharing platform.

Members have been encouraged to input data on incidents which have occurred in their businesses or supply chains into the anonymized data sharing platform, allowing other members to investigate similar issues or raise

concerns within their own companies and supply chains. Over the year, MSIN generated at least one intelligence submission per week for review and action by members if needed. It also shared 6 "high priority" alerts with all members, for immediate action, which in one case helped to stop high risk exploiters and in another led to members actively investigating to stop any potential issues in their own companies. Members have gathered at monthly working group meetings as well as for the MSIN Annual Conference in September 2023 to share insights and review trends in modern slavery. The conference was attended by more than 150 industry and NGO representatives and included a keynote speech from the Rt Hon Theresa May MP. In 2024, MSIN will continue to focus on increasing the quality and quantity of intelligence processed, expanding its membership, and driving value for its members in the increased sharing of trends and insights.

Responsible Recruitment Strategy & Labour Provision Audit Due Diligence:

The purpose of our responsible recruitment strategy is to have a documented and structured recruitment and labour provider management procedure.

Establishing an effective and collaborative relationship with our labour providers is essential if we are to truly understand the level and type of risk within our supply chain. We have a labour supply audit methodology that drives continuous improvement and builds capacity within the teams we work with. Our labour provider due diligence includes:

- Checked for a current Gangmasters and Labour Abuse Authority (GLAA) license
- Audited by the G's ethical team, twice per year. This includes verifying the Labour Providers management systems and business practices are compliant with the GLAA Standards.
- If areas of concern are found during the audit the Labour provider is issued with a corrective action plan and asked to address any issues within a specified time scale.
- the appropriate local and national legislation and law, as well as G's core standards outlined in our policies.
- Worker interviews are conducted prior to and after audits, to collaborate the information reviewed during the labour provider audit.
- Based on the results of the Labour Provider's audit a modern slavery benchmarking score is established, and this will impact the labour providers individual recruitment risk assessments.

Business Unit Ethical Audit Due Diligence:

The Group's business units undergo an annual internal ethical audit carried out by the independent Ethical compliance team. The audit framework evaluates a business's management systems against the ETI Base code, customer requirements, employment law, G's policies, and industry best practice. All businesses, if issues are found, are provided with a corrective action plan and a modern slavery benchmarking score. The ethics team work with the business unit to complete their remedial actions.

Training and Capacity Building

Training and collaboration are central in our efforts to prevent slavery and uphold human rights. We closely engage with our workers and suppliers, aiming to enhance their ability to recognise, handle, and address modern slavery risks. Colleagues across the businesses are regularly updated with current risks, initiatives, and progress to ensure ethical risks are kept current and relevant.

Our training programme is made up of 5 modules, each module raises a colleagues' awareness and expands their knowledge. The 5 modules are:

Ethics training at induction – Aimed primarily at permanent colleagues, providing an overview of the Ethics Department, its functions, and initiatives. This is an introduction to the ethical code of practices and standards the G's Group strive to achieve, (ETI Base code, ILO and the UNGPs)

Training for our seasonal colleagues – At induction seasonal colleagues are given information on workers’ rights, grievance mechanisms and modern slavery indicators. The risk of exploitation is at its greatest during the seasonal worker recruitment process. To counter this, we provide workers with detailed guidance information on appropriate recruitment processes and what we consider to be reasonable costs.

Modern Slavery Awareness Training - This module builds a clear understanding of what “modern slavery” means, what are potential indicators and how to spot them, and what are the correct reporting lines to use. Modern Slavery Awareness training is a mandatory requirement for all colleagues at G’s.

Modern Slavery & Responsible Recruitment Training – Designed to raise awareness of the risks that can be present during recruitment and to develop a consistent approach to recruitment procedures across the G’s Group. The module is mandatory for colleagues with people management responsibilities and those whose roles frequently bring them into contact with our colleagues most at risk.

Modern Slavery – Advanced - Our most in-depth module of modern slavery training, is specifically aimed at key colleagues who have direct reports and/or people facing responsibilities. This module contains case studies and includes activities where attendees can demonstrate their understanding and apply the knowledge they have gained.

Supply Chain Management and Due Diligence

G’s is primarily a producer business though it uses third-party suppliers from a number of 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 2023/24 were: UK, Spain, Senegal, Egypt, and Poland.

All ethical due diligence requirements for suppliers are defined in the G’s Fresh Supplier Approval Procedure. All suppliers receive a Supplier Pack containing detailed, mandatory ethical requirements. The Supplier Pack is regularly reviewed 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 fully complete their Self-Assessment Questionnaire (SAQ). Reviewing the SAQ and the details of the risk assessment (generated by the completion of the SAQ) of each supplier allows us to add depth to our monitoring systems.

Commitment updates

Commitment 2023/24	Outcome	
Training		
Continued expansion of our training programs, adding new stakeholders and increasing the scope of materials	During the year we have implemented Learning and Development software to enable accurate tracking of compliance with training requirements.	
Modern Slavery		
Increased communication with Site Champions to build awareness , trend identification and indicator updates.	Expansion of training of spread the level of expertise and awareness of issues and development of regular Power Bi reporting enables the identification of trends.	
Due Diligence		
Continued review and updates of audit framework and risk assessment tools for agencies in UK and non-UK operations.	Ongoing process of risk assessment and incorporation of new requirements.	

Additional efforts will be made to increase transparency in our GNFR (goods not for resale) supply chain.	Creation of electronic semi-automated supplier approval system has built the foundation to enable further transparency in GFNR category.	
Auditing Spanish partners with labour. Training to all workers on modern slavery indicators and speak up channel.	Achieved.	
Responsible Recruitment		
Continue to fully map recruitment streams and continue developing agencies and source country risk assessments to protect workers and inform responsible recruitment Labour plans	This is now an on-going process within the team's responsibilities.	
Launch of 'Just Good Work' App across UK operations.	System not available.	

Targets for 2024/25

We intend to build on the activities and progress we have made over the last 12 months. We will continue to strengthen our approach to managing the risk of modern slavery within our our businesses and the wider supply chain. Below are some of our planned areas of focus for 2024/25

1. Continue developing an electronic supply chain management system.
2. Develop a system for electronic collection and reporting of concerns.
3. Develop a reporting structure to enable to early identification of potential patterns of concern.
4. Review and improve training modules and consider different methods of delivery.
5. Develop suite of video communication in Native languages to raise awareness.