

MODERN SLAVERY STATEMENT

2024/25



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Introduction

Modern slavery and the risk of workers being exploited continues to be area of concern — not just in our own businesses, but within the UK farming and food manufacturing industries. G's is a family run business, we take our responsibility to ensure workers are treated with respect and protected from all forms of modern slavery including being exploitation, very seriously. G's is fully committed to and will continue to work towards eradicating modern slavery from the entirety of our supply chain.

We are determined to be transparent about the challenges we face; we recognise that working in isolation will bring limited success in the disruption modern slavery. However, collaborating with other organisations in the food industry, subject matter experts, stakeholders, colleagues, and suppliers increases the impact we can have significantly.

G's falls within the reporting scope of the UK Modern Slavery Act 2015 ('The Act') and this statement refers to our financial year ending 5th May 2025, it describes the actions we have taken to ensure that modern slavery is not taking place in our supply chain.

This is our 9th statement on modern slavery, in line with Section 54 of the UK Modern Slavery Act 2015. It details each G's business to which Section 54 applies, and the steps taken during the reporting period to ensure that slavery and human trafficking is not happening within G's. The G's businesses to which this Modern Slavery and Human Trafficking Transparency Statement for 2024 – 25 applies are:

- *Barway Services Limited*
- *G's Fresh Limited*
- *G's Group Holdings*
- *G. S. Shropshire & Sons Limited*
- *J. B. Shropshire & Sons Limited*
- *Sandfields Farms Limited*

This statement, which will continue to be subject to annual review, has been reviewed and approved by senior management.

Signed,



John Shropshire
Chairman

Our business

Guy Shropshire founded the business in 1952, he bought 330 acres of land near Ely, Cambridgeshire. Originally selling earth-covered celery in traditional bushel boxes to wholesalers and later building a packhouse to supply washed celery to a growing number of customers. Today, G's is one of Europe's largest fresh produce businesses.

We are a farming and packing organisation of salad and vegetable products and our promise is:

- To supply quality fresh produce that delights our customers every day.
- To be recognised as outstanding suppliers of sustainable, healthy fresh produce, and to be at the forefront of the industry in everything we do.

We supply most of the supermarkets in the UK and supply the wholesale markets and food manufacturers a well.

Our farms and production facilities are strategically located in the UK, Spain, Eastern Europe, West Africa, Netherlands, Germany, and the USA.

We have strong values for our workers, customers, and suppliers as well as enormous respect for the environment and nature.

More information about G's can be found www.gs-fresh.com

[Modern Slavery Statement 2023/24](#)

Governance & Strategy

During 2024 - 25, we have continued to evolve our governance model to ensure that it is fit for purpose. We have developed a clear governance process for handling modern slavery and human trafficking challenges, both within our operations and our supply chains.

We are committed to upholding the highest standards of human rights and ethical conduct across our businesses and supply chains. Our Modern Slavery and Exploitation Strategy is built on four core pillars:

- **Prevention:** Robust and continuously developing systems, policy frameworks, and controls to identify and reduce risk and prevent exploitation before it occurs.
- **Detection:** Promoting widespread awareness and encouraging the effective use of intelligence to identify potential issues.
- **Case Management:** Ensuring any victims are safeguarded and case integrity is preserved.
- **Leadership:** Setting expectations, sharing expertise, and driving best practices throughout our businesses and supply chains.

This strategy supports the core 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.

Our Human Rights related governance framework is implemented through a dedicated Ethics team located in the UK, Spain and Poland who are responsible for providing assurance on ethical practices.

Policy Framework

The G's Group policies and management systems ratifies our commitment to not tolerating any form of human rights abuse within our company and the wider supply chain. Robust policies are fundamental to underpinning the business's strategy and commitment to eradicating modern slavery. Our policies provide a clear framework that translates high-level values and intentions into practical and enforceable actions.

These policies have established clear expectations for behaviour, conduct and processes across the Group, ensuring that all stakeholders understand their role and responsibilities in addressing human rights issues.

Our framework consists of the following policies:

1. Human Rights Policy

The Human Rights Policy outlines G's commitment to uphold human rights in accordance with internationally recognised frameworks, including:

- [The United Nations Guiding Principles on Business and Human Rights \(UNGPs\).](#)
- [The Ethical Trading Initiative \(ETI\) Base Code.](#)
- [International Labour Organisation \(ILO\) Conventions.](#)

This policy provides the overarching framework that supports and integrates our wider policies on modern slavery and labour exploitation. It sets out the standards we expect from all of those who work within our businesses.

2. Responsible Use of Labour Providers Policy

We have a long-standing structured labour provider management system, designed to rigorously assess risks related to labour exploitation and non-compliance of ethical standards, i.e. GLAA licensing standards, responsible recruitment standards and customer requirements. Labour providers must demonstrate a commitment to and compliance with all relevant G's ethical policies.

This Policy establishes a clear framework for robust due diligence. This includes specific risk assessment criteria and on-going management protocols, which can be tailored to fit each Labour Provider and G's businesses requirements. Labour Providers risk ratings are assessed using established key performances indicators which support the ethical and responsible sourcing of Labour Providers.

3. Modern Slavery & Hidden Exploitation

The G's Modern Slavery and Hidden Exploitation Policy for UK operations outlines a set of comprehensive measures that can be taken to prevent and/or mitigate modern slavery risks within the G's direct and non-direct supply chain.

We continuously review the completed risk assessments and where we identify new or emerging risks they are incorporated into the appropriate business unit's strategy as soon as possible.

At a global level, our Group-wide statement on the Prevention of Labour Exploitation, Modern Slavery and Human Trafficking sets out the overarching principles that will guide all operations.

4. Whistleblowing & Speak Up Policies

Having effective and trusted grievance mechanisms, which are available to all workers, is fundamental to protecting our workers. Our Whistleblowing Policy is part of a broader grievance and reporting framework.

We continue to provide an independent and confidential whistleblowing reporting service, Speak Up, which is designed to give workers a "voice" and an opportunity to raise concerns or issues. The system is open to

any individual working at G's, including Seasonal and Agency workers, reports can be made in multiple languages, with several access methods, the system is inclusive and open to our diverse workforce. All colleagues receive training at induction on Speak Up and how reports are handled and investigated.

5. Ethical Trade Policy

We align our ethical standards with the principles and guidelines of the Ethical Trade Initiative (ETI) Base code; G's is committed to implementing the ETI principles. The ETI Base Code is a set of internationally recognized labour standards that aim to promote ethical working conditions in global supply chains. It covers a wide range of labour rights, including freedom of association, fair wages, and safe working conditions. The Base Code is widely recognised as a benchmark for ethical labour practices and is used by many companies.

Assessing and Mitigating Risk

In the last year, we have continued to develop our risk assessment processes. Our suppliers can be multifaceted and are everchanging, making the management of risk, especially modern slavery, exploitation, and violation of human rights increasingly difficult. The purpose of the risk assessment is to identify those supply chains with the greatest risks; it also informs our engagement plans and assists with the allocation of time and resources.

We gather risk data from several sources including from the SEDEX data base to keep our risk assessments systems current and accurate. By building a structured and holistic approach to addressing risk, it enables G's to provide greater protection for vulnerable individuals that maybe in our supply chain.

We conduct regular reviews of all G's business units, focusing on key risk indicators such as site location, labour type engaged (permanent, seasonal, agency etc), and management practices. We continue to have a strong 'on the ground' presence, utilising audits, and worker voice mechanisms to verify the level policies and management practices are embedded in a workplace.

Risk assessments are continually reviewed and where we find new or emerging issues, we work with the local management teams to assess the severity and steps that need to be taken to address the issue.

Audit Framework Due Diligence

Internal Audit Framework

All G's business units undergo annual internal ethical audits (as detailed in our Audit Framework Due Diligence document). The audit evaluates each site for compliance with:

- ETI Base code - Management practices
- Relevant employment legislation,
- G's Group's policies
- Customers' requirements.

Worker interviews are an integral part of the audit framework, providing direct, first hand and a factual insight into the workers day-to-day life at G's. We aim to interview at least 10% of a business units' workforce, providing workers with a personal platform and an opportunity to speak freely in a safe and trusted environment.

External Audit Framework

A requirement of doing business with many of our customers is, G's must be an active member of SEDEX (Supplier Ethical Data Exchange). SEDEX enables our customers to have visibility of our supply chain, and we can access detailed information on our suppliers. All G's sites in scope are required to complete a detailed Self-Assessment Questionnaire, which helps establish the risk level of a business and the frequency of the Sedex Members Ethical Trade audit (SMETA). We recognise the value of third-party

assessments, they validate the systems G's have in place and can identify issues, risks, or improvement areas that we may not have considered.

Responsible Recruitment Due Diligence

Seasonal Workers remain a priority in our modern slavery strategy. We have identified this category of worker as high risk as there is an increase chance the workers will be exposed to exploitation, i.e. payment of illicit recruitment fees.

We continue to be concerned about the vulnerability of seasonal workers coming to the UK for work. The risk of workers paying illicit recruitment practices remains an area which requires enhanced attention. We have various processes in place to support the group's responsible recruitment strategy, key activities include fully mapping recruitment streams, recruitment processes & costs, and multiple platforms for communication and engagement, i.e. worker interview, confidential hotline, onboarding forms and staff surveys.

Labour Provider Audit Framework

Labour Provider management is core to building strong and meaningful responsible recruitment practices. In alignment with our Responsible Use of Labour Providers Policy, all labour providers undergo a pre-supply audit, compliance with the G's protocols must be established before contracts are issued and labour supply can begin. Approved labour providers are audited bi-annually, where we review any updates to the labour providers systems, compliance with the relevant standards remain in place and interview workers to cross reference the information we have been given.

Labour Providers are required to sign a G's Service Level Agreement (SLA) that details the services, responsibilities, processes, and standards expected in relation to the provision of temporary labour.

CASE STUDY: Responsible Recruitment – In-country Enhanced Due Diligence.

G's have always prioritised the importance of safe, fair, and transparent recruitment practices, historically recruiting directly and in-person in the UK and Europe. Following Brexit and the subsequent changes to immigration rules, we are now reliant on SWS Operators to recruit for most of our seasonal roles. Since 2019, we have travelled to various countries with the labour providers to observe recruitment events first hand.

In 2024, key members of the recruitment, accommodation management and Ethics team travelled to Tashkent in Uzbekistan, and Bishkek in Kyrgyzstan to attend several recruitment events. G's witnessed how the recruitment events are run; we had the opportunity to verify the recruitment practices of the Labour Provider. Additionally, we assessed the level of information provided to applicants, making sure that key information about worker rights, visa conditions, costs, the nature of the work and the standard of accommodation were clearly communicated. Most importantly, we have had direct contact with people who potentially will become employees of G's.

Intelligence Management

Without receiving some form of Intelligence, the identification and prevention of modern slavery risks would be impossible. We have embedded both proactive and reactive response systems to support how any intelligence or potential modern slavery indicators are handled; protocols are in place to ensure modern slavery risks are effectively addressed.

Yellow Flag System

As part of our commitment to eradicate modern slavery and safeguard our workers, G's have an embedded a mechanism known as 'Yellow Flag reporting'. Our mandatory modern slavery training modules, equip workers across the organisation with the skills to identify the subtle warning signs of modern slavery, whether that be through direct observation, overheard conversations, or behavioural indicators. The

training also provides workers with information on how to raise any concerns and who they should be reported to so further investigation can take place.

Every Yellow Flag report, no matter how small it may seem, is treated as a viable source of intelligence and investigated. The information is logged into the Intelligence Matrix; cross checked for any trends, patterns, or reports of a similar nature.

By embedding an intelligence-led approach to our case handling and investigative frameworks, we ensure that our systems are intuitive and continuously evolving. Using Intelligence in this way, we strengthen our ability to detect patterns, address risk and adapt our practices. It provides G's with the tools to move from being solely reactive and enables us to move towards a more dynamic, preventative model where victim safeguarding, legal accountability and integrity of a case is at the centre of the process.

Case Study: Co-op Treating People Fairly Award – Recruitment Worker Interviews

In 2023, we revised our Recruitment and Labour Provider Risk Assessment protocol which was a key tool in identifying and managing potential risks of modern slavery in our labour supply chains. Our worker interviews and recruitment stream mapping were reviewed and enhanced, and a new reporting tool was introduced. The objective was to get a full understanding of the seasonal worker recruitment pathways, what they had experience and gather information on any costs and/or fees they had paid during their recruitment experience.

A considerable amount of research was conducted to build the reporting tool; we wanted to identify the different recruitment processes per country and map all recruitment costs presented to workers during the various stages of recruitment. We wanted to get a better understanding of the “services” workers’ pay for, how they pay and to whom they pay, including a full map of visa processing and additional legal paid, but optional, services available to workers.

The Ethics Team captured information on the recruitment pathways used by the workers. Once the information was added to the reporting tool it immediately flags if this is a legitimate recruitment stream or not. Secondly, when inputting costs workers reportedly paid, the tool will immediately highlight if the cost(s) are reasonable and acceptable for that specific recruitment pathway and country. The tool also helps identify, by assigning all legal costs, where any illicit fees may have been made, and at what point in the recruitment process.

Modern Slavery Training

Our modern slavery training programme has been carefully designed to strengthen awareness and deepen understanding of the risks, indicators, and dynamics associated with labour exploitation and modern slavery. It plays a critical role in our broader risk management framework, supporting the early identification of potential issues and ensuring colleagues are equipped to respond appropriately.

Our training framework consists of five structured modules, each designed to build incremental knowledge and operational confidence. These modules support employees in understanding how modern slavery manifests within a business’s operations and supply chains, how to recognise various modern slavery indicators and how to take informed action through the appropriate internal reporting channels, as well as training in key aspects of specific internal policies.

We aim to foster a workplace that is not only aware of modern slavery risks but also actively engaged in mitigating them and ultimately contributing to more ethical, transparent, and resilient business practices.

Induction Level Ethics Training

All colleagues are required to complete a foundational Ethics Training module as part of their induction. For permanent colleagues, this training provides a comprehensive introduction to the Ethics Department, outlining core functions and strategic initiatives. Key topics include an overview of the Human Rights and Modern Slavery Strategy, the Ethical Trading Initiative (ETI) Base Code, International Labour Organisation

(ILO) conventions and the United Nations Guiding Principles on Business and Human Rights (UNGPs), all of which underpin our Group Strategy.

For seasonal colleagues, tailored induction content is provided and translated, including information on workers' rights, practical guidance on accessing multiple grievance mechanisms and an overview of modern slavery indicators.

Modern Slavery Awareness

This training module is designed to establish a clear and practical understanding of modern slavery, key risk factors, and various indicators that may be presented in the workplace or through the supply chain.

Modern Slavery Awareness training is a mandatory requirement for all colleagues across G's, reflecting our commitment to maintaining an informed and capable workforce that know how to respond to potential instances of exploitation.

Modern Slavery & Responsible Recruitment Training

This training module is specifically designed to train key colleagues on recruitment policies, specifically, our Responsible Use of Labour Providers Policy. Completion of this module is mandatory for all colleagues with people management responsibilities, as well as those whose roles involve regular interaction with individuals considered most at risk.

Modern Slavery Advanced

This is a bespoke training module where the ethics team share the most in-depth information and case studies. Often tailored to a specific risks and business units and aimed at key colleagues with a higher likelihood of encountering modern slavery indicators or cases.

Supply Chain Due Diligence

Ethical and human rights due diligence is a critical component of responsible business practice in global supply chains. G's primarily operates as a producer but also, when the need arises, sources produce from third-party suppliers across 18 countries. During the 2024/25 financial year, the top five sourcing countries by gross sales value were United Kingdom, Spain, Senegal, Egypt and Poland.

G's are aware that sourcing product from multiple countries heightens the risks related to labour exploitation and other potential human rights violations. To address this, we have embedded ethical due diligence requirements which are comprehensively set out in the G's Supplier Approval Procedure.

A robust onboarding process is in place for all suppliers, both new and programmed. Suppliers receive a detailed Supplier Pack outlining our ethical standards, expectations, and mandatory requirements. This pack is regularly updated in alignment with industry best practices and emerging risk within the sector and geographical locations.

Supplier Approval Process – Ethical Assessment

As a minimum requirement, all suppliers must be registered with the Supplier Ethical Data Exchange (SEDEX) and have completed the Self-Assessment Questionnaire (SAQ).

Each supplier must update their SAQ every 6 months, G's will review any changes and check the questionnaire for overall compliance with the ETI base code. In addition, suppliers are assessed for risk using the SEDEX Radar Tool, which assists in identifying high-risk locations and provides G's with a comprehensive understanding of any potential labour and human rights issues.

Depending on the type of supply, suppliers may be required to have undergone a SEDEX Members Ethical Trade Audit (SMETA) and/or Global Risk Assessment on Social Practice (GRASP) These audits provide a structured, internationally recognised framework for assessing working conditions, labour practices, health and safety, and business ethics at supplier sites. All Audit reports are reviewed, and where non-conformances or increase in risk is identified, we increase the level of diligence to the supplier.

Collaboration and Partnerships

Addressing the complex and evolving challenge of modern slavery requires coordinated, multi-stakeholder collaboration. Effective detection, disruption, and prevention efforts depend on strong partnerships that can work together across industry and other areas. Understanding this, G's are committed to collective action and are actively engaged in a range of collaborative forums aimed at driving systemic change and improving protections for workers.

Modern Slavery Intelligence Network (MSIN)

G's are a founding member of MSIN, a pioneering non-profit collaboration in the UK food and agricultural sector created in response to the findings of Operation Fort (the UK's largest ever modern slavery investigation). MSIN aim is to share information generated by the network to identify patterns & trends of modern slavery and to use this knowledge to disrupt traffickers.

Members are encouraged to share data on modern slavery incidents that have occurred within their businesses or supply chains. In 2024, G's submitted 19 reports to the platform and have reviewed all submissions made by other members. MSIN continue to focus on improving both the quality and quantity of intelligence processed.

Seasonal Worker Taskforce

The Seasonal Workers Scheme (SWS) came into operation in 2019, and in 2024, 45,000 visas were made available for workers to come to the UK via approved licensed labour operators to work within the fresh produce sector. The scheme continues to receive several negative reports of human rights issues related to debt bondage, high fees paid by migrants to access work and poor working conditions

The Seasonal Workers Scheme Taskforce, comprising of retailers, growers, suppliers, scheme operators, and industry associations, was established to develop practical actions to address these challenges. This year, our Ethical Working Director continued their role on the Governance Committee, helping to drive the Taskforce's progress.

G's have participated in roundtable discussions, i.e. continuous development of a Responsible Recruitment Progress Assessment (RRPA) and have supported and hosted Grower Roadshows and participated in various third sector research initiatives.

Food Network for Ethical Trade (FNET).

We continue to be active members of FNET, which brings together food suppliers and retailers to tackle common supply chain challenges. Collaborating with industry peers we will carry on working towards addressing risk areas and sharing best practice regarding modern slavery.

G's are members of various FNET working groups, i.e. Responsible Recruitment. We remained focused on the evolving risks within UK seasonal labour.

Spanish Ethical Trade Forums

The Spanish Ethical Trade Forums are a collaborative initiative launched to improve working conditions in the Spanish agri-food sector. Bringing together key stakeholders from across the supply chain, including producers, growers, and retailers, to collaborate on the development of practical tools to implement good labour and ethical practices.

There are regular events, training workshops, working groups and innovative projects.

Case Study: Cambridgeshire Modern Slavery Charter – High Sheriff of Cambridgeshire

In July of 2024, G's welcomed the High Sheriff of Cambridgeshire, David Way when he visited our Head Office in Barway. The High Sheriff has a particular interest in tackling modern slavery and he has committed to drafting the first Modern Slavery Charter for Cambridgeshire and Peterborough and wanted to gain a more detailed understanding of the G's strategy and how we manage modern slavery risks within our

businesses and our wider supply chains. The High Sheriff spoke with our seasonal workers gaining insightful knowledge on their experience's workers during their recruitment and arrival to G's

Throughout 2024, G's has worked closely with the High Sherrif and have been a member of a committed group of industry stakeholders to develop a charter that seeks to:

- Prevent modern slavery in Cambridgeshire and Peterborough and to lead by example
- To positively look for, identify and report modern slavery in any form to relevant authorities
- To educate ourselves, our colleagues and society on the identification of modern slavery where it can be found.

In January of 2025, G's attended The High Sheriff of Cambridgeshire's Business Conference with the keynote speaker Baroness Theresa May and titled "Making Cambridgeshire the First Modern Day Slavery Free County". Our Chairman, John Shropshire supported the conference, joining a panel to discuss the challenges faced across Cambridgeshire and reiterated the importance of having tangible action to address the prevention and mitigation of modern slavery.

We continue to support the High Sheriff's commitment to the development of the Modern Slavery Charter for Cambridgeshire and Peterborough.

Commitment Updates

Commitment 2024/25	Outcome	
Training		
Review and enhance training modules and materials, including the scope of mandatory training.	Key Training Modules completion rates: M.S Awareness: 93% M.S & Responsible Recruitment: 95%	
Modern Slavery & Worker Voice		
Review whistleblowing and grievance mechanisms (yellow Flag) reporting methods and effectiveness	Introduced additional reporting avenue via H&S System	
Continue ongoing confidential dialogue with individuals to develop trust and identify areas of concern and opportunities to improve worker satisfaction	248 worker interviews conducted.	
Review and enhance communications with Group – develop suite of video communications to raise awareness.	'Yellow Flag: That's Not Right' Video series developed. 5 videos translated into 13 languages for delivery throughout 2025 season.	
Implement The Great Place to Work independent survey for all seasonal colleagues	Successfully implemented detailed data analysis enabling identification of opportunities to improve seasonal worker experience.	
Due Diligence		
Continued review and updates of audit framework and risk assessment tools for agencies and Business Units.	Developed SMETA 7 and Auditing Guidance support and training for appropriate Business Units.	
Continue developing electronic supply chain management system	Implemented enhanced system, reducing administration by utilising automations, increasing efficiency.	
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	Continuous development of process within the team's responsibilities.	
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Targets for 2025/26

Targets 2025/26
Review and enhance training modules and materials, including the scope of mandatory training.
Review Governance and reporting arrangements of audit results and follow up of actions plans to address non-conformances
Continue implementation of Strategic Imperative regarding embedding of ethical business practices
Build on implementation of The Great Place to Work independent survey for all seasonal colleagues
Roll out SMETA 7 and Auditing Guidance support and training for appropriate Business Units.
Run specific business sessions to build local knowledge of ethical business and individual practices and responsibilities
Continue developing electronic supply chain management system
Continue to fully map recruitment streams and continue developing agencies and source country risk assessments to protect workers and inform responsible recruitment Labour plans
Establish Business Unit specific Risk Register to identify and prioritise action at local level.
Continue to work collaboratively with industry partners and colleagues to bring an end to modern slavery within our businesses and supply chains.
Continue to raise awareness of Yellow Flags and reporting avenues.