

## Anti-Slavery and Human Trafficking Statement

### Statement wording

#### Introduction

This statement sets out Gressingham Foods's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 March 2018 to 28 February 2019.

As part of the Poultry Industry the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

#### Organisational structure and supply chains

This statement covers the activities of Gressingham Foods Ltd, Green Label Poultry Ltd, and Green Label Farms LLP and operates wholly in the United Kingdom. We have over 600 employees throughout the four companies and we have a turnover of circa £110 million per annum.

Our organisation rears and produces high quality poultry and poultry products. We supply most major supermarkets in the UK. The main products we produce are Whole Duck and added value products. Whole Turkey and added value products and seasonal Geese.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

Gressingham Foods is a member of SEDEX (Supplier Ethical Data Exchange) this is a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains.

#### High Risk:

The main sources of high risk internally are identified as our temporary seasonal labour supply. This is particularly the case in November and December each year when over 500 temporary workers are recruited from abroad for our Christmas Campaign.

External labour providers have also been identified as areas of higher risk and we look to mitigate these risks by:

- Recruiting directly where possible
- Undertaking structured induction and training processes which includes discussing all company policies and a discussion/video in own language on Stronger Together and includes a flyer from stronger together and a stronger together questionnaire in own language.

- Undertaking ad-hoc confidential questionnaires/interviews with agency personnel
- Carrying out a robust level of audit and approval of all external agencies which includes Agency labour provider audits
- Ensuring that Service Level Agreements are in place with all external agencies.
- Our Personnel staff and Management staff regularly attend events where there is the opportunity to discuss the risks of Modern Slavery and Human Trafficking with our contemporaries, the GLAA, British Poultry Council, Food Network for Ethical Trade, other non-Governmental Organisations ('NGOs') and other relevant stakeholders. This helps to expand our knowledge and highlight countries, product types or services that may be considered to have a higher risk of Modern Slavery. The knowledge and experience that we have obtained will help us identify the risks and issues, assess the level of importance and develop appropriate remedies. We will continue to collaborate and improve our understanding as time goes on.

## **Responsibility**

Responsibility for the organisation's anti-slavery initiatives is as follows:

Policies: Directors and Senior Management.

Risk assessments:

Investigations/due diligence: Personnel Managers, Production Managers, Procurement Manager and Technical Manager

Training: Tackling Modern Slavery in UK businesses and Global supply chains (Stronger Together Courses) DVD training programme. Sainsbury's Ethical Trade Training.

Personnel Managers Production Managers and Trainers have attended the above course in 2018 along with the Company Directors, Production Managers, Company Trainers, Procurement Manager and Technical Manager.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Anti-Slavery and Human Trafficking Policy this is included in the employee handbook (35 page 119).

Whistleblowing policy - this is included in the employee handbook (33 page 113).The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can call the Tesco supplier line or Report it to the GLAA - Gangmasters Licensing Authority on 0800 432 0804 or Modern Slavery Helpline on 0800 0121 700 or at <https://modernslavery.co.uk/contact.html> or can report directly to the Personnel

Manager. We have also contracted an external whistle blowing hotline, Speak-Up, In-Touch which has been published and advised to all staff, customers and visitors to site.

Ethical Policy a copy of this is on our staff notice boards and an abridged version is included in the employee handbook (36 page 121).

Equal Opportunities this is included in the employee handbook (3 page 8).

All the above policies makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating both in the UK and abroad and managing its supply chain.

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. Where we have serious concerns we would terminate contracts immediately.

The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. The agencies we use all have staffed trained on stronger together and publicise this and give stronger together information to their staff. We have SLA's in place for the agencies we use. We audit each of our agencies twice each year and have active checks set up with GLAA of instances where action has been taken as a result of the risk of slavery and human trafficking.

#### **Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

Sending out basic Modern Slavery and Human Trafficking due diligence questionnaires to be completed by new suppliers. Leading to evaluating the modern slavery and human trafficking risks of each new supplier.

Ongoing mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking initially targeting 20 of our top products and sending out the FNET more detailed questionnaires and risk assessing findings in conjunction with Food Network for Ethical Trade. (FNET) Alongside this we will be using SEDEX to check suppliers for their labour standards, compliance in general, and modern slavery and human trafficking in particular;

#### **Performance indicators**

The organisation continually reviews it'has reviewed its key performance indicators (KPIs). As a result, the organisation is:-

Calling for: New Directors, Supply chain managers, HR professionals, Production Managers, to the business to have completed training on modern slavery on an on-going basis.

Continually review its existing supply chains on a risk based level, to ensure existing suppliers are evaluated.

## **Training**

The organisation requires our Directors as well as Supply Chain Managers, HR professionals, Production Managers, Company Trainers and Technical Managers within the organisation to complete training on modern slavery as a module within the ethical trade training programme.

The organisation's modern slavery training covers:

Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;

How to identify the signs of slavery and human trafficking;

What initial steps should be taken if slavery or human trafficking is suspected;

How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;

What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### **Awareness-raising programme.**

As well as training staff, the organisation has raised awareness of modern slavery issues by distributing flyers to staff, questionnaire's, putting up Stronger Together posters on notice boards across the organisation's premises, Stronger Together video shown in Redgrave staff canteen.

The flyers and posters explain to staff:

The basic principles of the Modern Slavery Act 2015;

How employers can identify and prevent slavery and human trafficking;

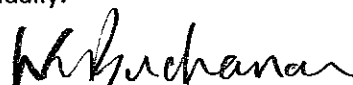
What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and

What external help is available, for example through the Modern Slavery Helpline.

In the next 12 months we will look at ways in which we can continue to strengthen our approach to managing the risk of Modern Day Slavery within the Gressingham group of companies. We will continue to build on the improvements we have made this year. Our risk mapping of suppliers will continue. We will also continue to improve communication on this subject with our supply chain and will continue to collaborate to identify risks to enable us to face future challenges. We will work together, not only with suppliers but also with other UK businesses to ensure we are more efficient in meeting our shared goal of eradicating Slavery.

This statement is made pursuant to section 54(1) OF THE Modern Slavery Act 2015 and constitutes our Anti Slavery and Human Trafficking Statement for the financial year ending February 2018

This statement was approved on 30<sup>th</sup> March 2019 by the organisation's board of directors, who review and update it annually.

(Director) signature:   
(Director) name: W.E. BUCHANAN

Date: 15. 11. 19