



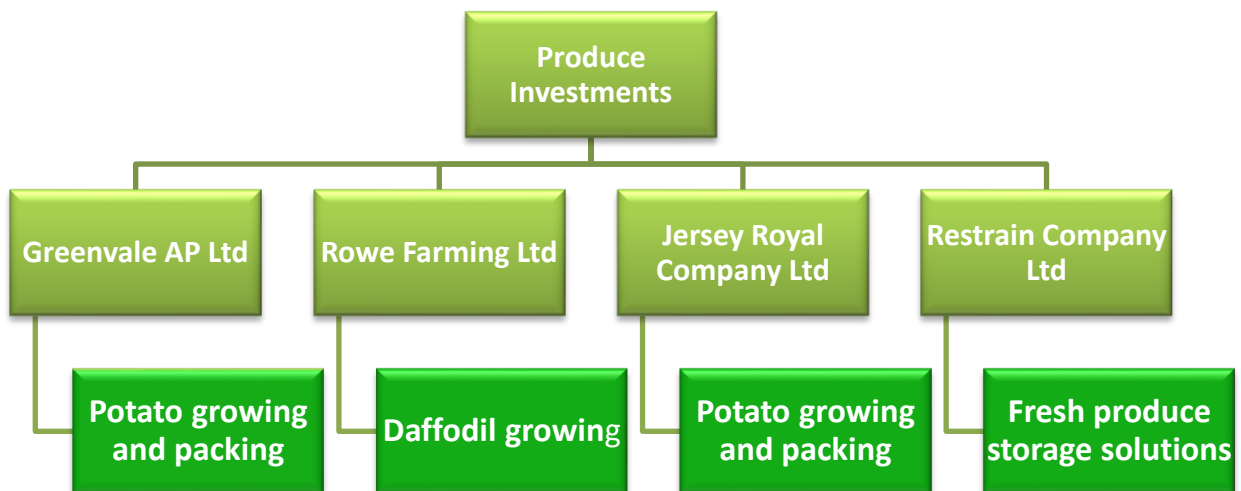
Statement on Modern Slavery for Financial Year Ending August 2023

This is the seventh Produce Investments Modern Slavery Statement which is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Produce Investments Ltd (**PI**) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. **PI** has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

PI was established in 2006 and is the parent company of four organisations within the fresh produce sector, as per the structure below.



PI has a presence in a number of locations throughout the UK and Jersey as well as in France, Germany, Belgium, Poland the Netherlands and North and South America. The maximum number of employees at any one time is approximately 1,400, with 95% of these being directly employed. **PI** is committed to both compliance with the Modern Slavery Act and to the

identification and eradication of slavery, servitude and human trafficking as defined by the act. PI is also committed to supporting its suppliers to ensure their practices are legitimate, ethical and in step with the values of the company.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Human Rights policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking does not take place anywhere within our supply chain.

Relevant Policies

In keeping with our commitment to act with integrity in all our business dealings, many of our existing policies help to ensure that there is no slavery or human trafficking in any part of our supply chain. We have several policies in place relevant to Modern Slavery, all of which are signed off at Director level.

- Employment Policies;
- Behaviour at Work Policy;
- Anti-Bribery and Corruption Policy;
- Human Rights Policy, Ethical & Modern Slavery Policy.

Our policies set out the behaviours we expect from employees in the dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisors, governments and competitors. All employees are expected to act with integrity in accordance with the standard of behaviour set out within our relevant policies.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions and the company relevant policies. We encourage employees to raise concerns where breaches of our policies have occurred.

We actively support employee engagement, representation, dialogue and the ability of any employee or agency worker to raise potential concerns or grievances, as evidenced by our Whistleblowing support line. Freedom of association and the right to collective bargaining is a core labour standard that we respect as guided by the International Labour Organisation (ILO). We apply our employment practices in line with, and in certain aspects exceeding the requirements of, local legislation.

We are guided by the SA8000 standard to cover a variety of potential issues including child labour, forced labour, health and safety, freedom of association, the right to collective bargaining, discrimination, disciplinary practices, working hours, remuneration, and management systems.

2022

During 2022, our Human Rights Working Group developed and we improved KPI reporting on the following areas;

- Growers (SEDEX Completion, High, Medium, Low Risk, Customer Derogation)
- Procurement (SEDEX Registration, High, Medium, Low Risk)
- Employees (Whistleblowing Reports received and outstanding, Grievances received and outstanding, Modern Slavery training, Ethical Audit Compliance)

We review our KPI's annually to ensure they remain relevant and focussed.

Risk Assessment and Due Diligence of Suppliers and Supply Chain

The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of our policies and procedures as well as the oversight built into our business operations, and the knowledge and skill of our staff. We assess risk based on a number of factors such as geographical risk indices pertaining to human rights (e.g. Global Slavery Index Rating), the level of supply chain control, external governance factors and customer ratings.

There is a higher risk of modern slavery and worker exploitation when we do not directly employ workers, such as in the procurement of people and in our supply chain. We have robust due diligence procedures in place to ensure procured labour only comes via agencies that have responsible recruitment processes, and all our contracts include our requirements for upholding labour standards.

We consider that the most significant risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

We undertake due diligence when considering new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include;

- 100% of raw material suppliers are approved annually through desktop questionnaires.
- Every programmed raw material supplier is a member of Sedex and each one of these suppliers updated their Sedex Self Assessments Questionnaire (SAQ) in 2022-23.
- Every programmed raw material supplier has maintained their SAQ at 100%.
- Our growers attended Stronger Together Tackling Modern Slavery in UK Businesses workshops.
- Ethical audits (Sedex Members Ethical Audits (SMETA)) were carried out by independent third-party auditing bodies on suppliers located in high-risk countries such as Israel and Egypt. All non-compliances were closed off within agreed timescales.

- Steps were taken for Goods and Services suppliers to obtain Sedex membership by 2022.
- Goods and Services suppliers Sedex membership increased by 69% in 22/23.
- Goods and Services suppliers to be approved through desktop SAQs.

However, we recognise the limitations of ethical audits to identify modern slavery issues, therefore in order to have effective modern slavery due diligence, we need to undertake a range of other methods that are appropriate for the supply chain. In the past year our due diligence has included;

- Bespoke due diligence audits to labour providers including Gangmasters and Labour Abuse Authority active checks.
- Greenvale team visits to new growers to our supply base.
- Invoking sanctions against suppliers that fail to improve their performance in-line with an action plan. Significant violations of our policies lead to termination of our business relationships, where remediation is not considered acceptable.

Training and Awareness

We ensure that we have competency within our organisation, via Modern Slavery training and awareness of the Social Accountability Standard, SA8000. We use accredited third-party supplier auditors who are trained and competent Social Compliance Auditors and who work with us, advising our Management Team and employees.

Modern Slavery awareness training is undertaken by the Human Resources Department and in an effort to avoid modern slavery or human rights abuses in our supply chains, specific supplier standards training is undertaken by those in Procurement, who are deemed to have the closest relationships with suppliers. More general awareness is available throughout the wider organisation through our relevant policies, work place posters and notice boards.

Board of Directors Approval

The PI Group of companies will never knowingly enter into a business relationship with any organisation involved with slavery, servitude or human trafficking. The Senior Management of the company accepts responsibility for the implementation of any policy in relation to this matter and for the provision of adequate resources to ensure that slavery, servitude or human trafficking is not taking place in the company or its supply chain.

This statement has been approved by the Managing Director (or equivalent) of each PI company and the Chief Executive of Produce Investments.

This statement will be reviewed annually.

Andy Ferguson

Signed.....

Date 1st March 2024

Andy Ferguson – Director

A selection of organisations that we work with:



An alliance of companies, trade unions and NGOs advocating respect for workers' rights around the globe. Produce Investments Companies are corporate members.



We roll-out Stronger Together training and guidance to our employees and encourage our supply base to attend the training in order to detect, deter and deal with modern slavery.



We are a member of Sedex (Supplier Ethical Data Exchange) and use the Sedex platform to store supply chain assessment data, such as SAQ and audit information of our suppliers