wealmoor®

Wealmoor Modern Slavery Statement

2022



Maximising our impact to provide positive benefits for people in our UK operations, end-to-end local and global supply chains and communities.

FOREWORD

Wealmoor Modern Slavery Statement concerns all companies within our food group held by Lotus Flower Holdings (LFH), including Wealmoor, Herbfresh, Radville Farms and Tropical Growers Export. The statement for the financial year ended 2 April 2022 has been published in accordance with Section 54 of the UK's Modern Slavery Act 2015. It sets out the steps taken by us during our 2021/22 financial year to prevent modern slavery and human trafficking within both our UK and global businesses and supply chains. This statement also outlines how we have implemented a range of activities during this period to deliver on the targets set out in our previous Modern Slavery Statement and identifies our business priorities for the financial year ahead.

This statement outlines how Wealmoor's wider approach to trading and human rights is key in identifying and addressing modern slavery. As well as identifying risks, our aim is to identify where we can maximise our impact to provide positive benefits for people throughout our UK operations, end-to-end local and global supply chains and communities.

Modern slavery is a complex issue to identify and address. It involves multiple challenges and hidden aspects that no organisation can easily tackle alone. Labour exploitation is a spectrum ranging from modern slavery to decent work. At Wealmoor, we believe that by focusing on providing decent work to reduce workers' vulnerability to labour exploitation, we can help to prevent and tackle modern slavery. In fact, we work to continuously improve our policies, risk assessment, monitoring and reporting systems to better understand and reduce worker vulnerability throughout our UK operations and local and global end-to-end supply chains.

We believe in long-term, ethical, collaborative, sustainable end-to-end responsible relationships with all of our growers, customers and colleagues, all of which form part of our Company's Purpose, Mission and Values.

Our Mission

To sustainably grow and source, market and deliver high-value fresh produce, while making a positive impact on communities and local environments.

Simply put, we want the best for our customers, our people, our farmers and our communities.

The Wealmoor Way® - Our People

We are extremely proud to attract like-minded, skilled, knowledgeable, expert People who are proud to share our purpose and values.

OUR PURPOSE

"To be the UK's most successful ethical, collaborative and customer-focused fresh produce company"

OUR PILLARS

People

Improve the lives of workers and communities within the countries where we source and operate

Planet

Reduce our environmental impact to leave the planet in a better place for future generations

Profit for Purpose

Grow volume and maximise profits to reinvest into our long term supplier partners

OUR VALUES



Community & environment

We work hard to make a positive impact on the world around us. We do this by continually investing in our communities and environment, and by supporting the wellbeing and future welfare of our people.



Entrepreneurial & passionate

We always look for ways to grow and develop our business, and to improve what we do. In fact, being entrepreneurial and passionate lies at the heart of Wealmoor and the way we work.

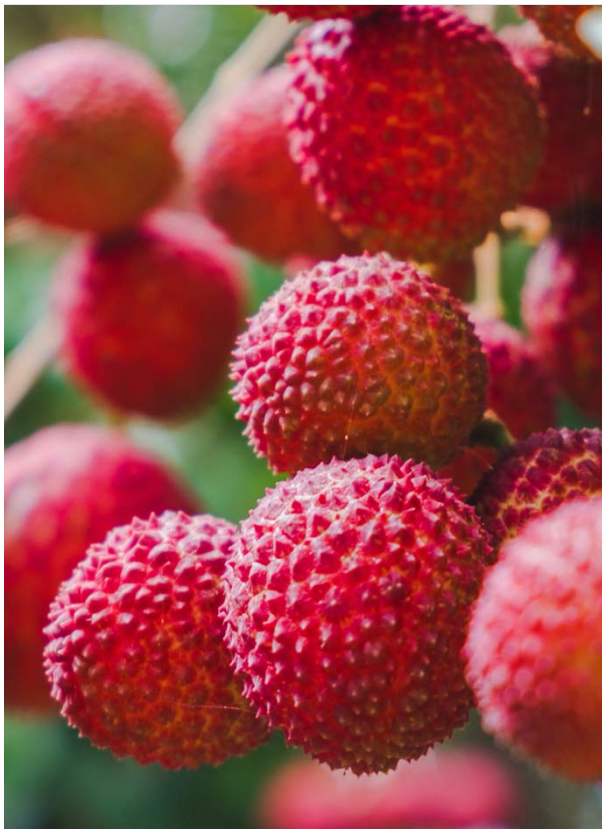


Empathy & win-win

We identify with creating long-term, meaningful and mutually beneficial relationships with our growers, suppliers, customers and employees. We want to create a positive difference for all.

At Wealmoor the journey for change has already begun. For many years we have worked in partnership with global and local communities to put the United Nations Sustainable Development Goals (UNSDG) at the heart of what we do. UNSDG are recognised as the foundation on which to drive positive change and address the challenges societies face, now and into the future. Our current approach already positively impacts the majority of the UNSDG, either directly or indirectly.

The Wealmoor Way has been designed to help us plan and run our businesses responsibly. With our Mission, Purpose and Values at the heart of this, we're able to make a positive impact on the world and to create a real point of difference. In fact, The Wealmoor Way not only helps us to tackle modern slavery, but also enables us to achieve greater transparency and a continued level of improvement among our people, communities, suppliers and customers.





We recognise that the abolition of modern slavery requires an ongoing, collaborative effort. That's why, as a forward-thinking business, we aim to lead the way in respecting and promoting human rights as well as developing excellent labour practices throughout our businesses and supply chains.

Wealmoor is committed to being a loved, trusted and respected family business by treating people fairly at all times.

Leena Malde
Executive Chair

Definitions of Key Terms

Bonded Labour
Where a person is forced to work and unable to leave because of a debt.

Decent Work
Work that is productive and delivers a fair income, workplace security, social protection, prospects for personal development and social integration, and freedom for people to express their concerns, organise and participate in the decisions that affect their lives. It also offers equality of opportunity and treatment for all women and men.

Ethical Trading Initiative (ETI) Base Code
An internationally recognised set of labour standards to drive improvements in working conditions. Working with our suppliers and others, we seek to ensure good working conditions in all of our operations, from both local and global end-to-end supply chains, in line with this ETI Base Code and report on progress against agreed targets each year.

Freedom of Association
The rights of workers (and employers) to form and join organisations of their own choosing.

Human Rights Due Diligence Framework/Approach
An on-going risk management process used by a company to prevent, identify and act on actual and potential risks for workers in its own operations, supply chains and the services it uses.

Living Wage
A wage that allows a worker to afford a decent standard of family living, with a little extra contingency.

Modern Slavery
Exploitative situations that a person cannot refuse or leave because of threats, violence, coercion, deception and/or abuse of power.

Participatory Audits
Workplace assessments designed to understand working conditions at a particular work site. A participatory audit makes sure that workers on-site are fully involved in the assessment.

The Wealmoor Way – A Responsible Business Plan
Our collective Mission, Purpose and Values.



Performance Review

In 2021/22 we aimed to broaden our modern slavery programme, constantly improving it to increase its impact.The following table summarises our progress against this programme.

Objective	Business Commitment	Established	Successful Delivery FY22	Continued Progress FY23
Prevention	Due Diligence	Any labour provider that we use must be licensed under the Gangmasters (Licensing) Act 2004 (GLAA)		
		Ensure appointed labour provider notifies us each and every time they have a visit or inspection from the GLAA and tell us about the outcome.		
		Have in place a comprehensive Service Level Agreement with appointed labour provider.		
		Ensure we are paying our labour provider enough to meet the minimum legal wage requirements and other associated costs.	Conduct documented random checks of our agency workers.	
		Conduct regular audit of our labour provider to ensure they continue to act responsibly.		
Trusted Environment	Knowledge Base, Capacity Building	All staff fully briefed during Induction on the Modern Slavery Act 1954 and Ethical Trading Initiative Base Code.		
		Enhanced site compliance team to support monitoring, evaluation and reporting of risks at our UK sites.	Extend, expand, renew Modern Slavery and Ethical Trading Initiative Base Code training to roles with supervisory management responsibility and people supporting functions - People and HSE teams, to readily identify signs of modern slavery.	Engage sufficient compliance resource to support increased monitoring frequency and evaluation of our supply chain through the Sedex platform. Increase our monitoring frequency due to the dynamic risks associated with modern slavery.
			People & HSE teams to attend and participate in Tackling Modern Slavery in UK business workshops held by Stronger Together.	
	Refer a Friend Scheme	Social isolation can affect people's physical and mental health. It can also increase vulnerability to exploitation, particularly if they are made to feel valued and are offered a sense of companionship. In most cases, strong family and friend relationships are a protective factor. That's why we have successfully introduced our Refer a Friend scheme. The scheme aims to support colleagues by providing potential work for people they are close to.		
	Labour Supply Channels	Continue to closely monitor and understand evolving risks by mapping and risk assessing labour supply channels.		
Tackling Modern Slavery	Raise Awareness	Processes, Internal & External Platforms	Use of Stronger Together communications assets for display and interaction	
	Grievance Mechanism			
	In Partnership With Others		As members of The Association of Labour Providers (ALP) we have access to valuable advice, resources, training and guidance for our business which helps us improve our compliance functions and industry knowledge.The ALP provides excellent information and guidance in a complex and ever changing business environment.	Together with our suppliers and customers, we participate in Food Network for Ethical Trade (FNET) a network developed to support collaboration throughout supply chains, including addressing priority risks such as modern slavery. FNET has continued to serve as an invaluable forum for members to share details of the challenges faced as a result of the pandemic, including increased risks of modern slavery. Members highlighted emerging issues such as excessive working hours, supply chain pressures and audit effectiveness.

The Wealmoor Business

Business Structure

Our heritage and our values are central to who we are and The Wealmoor Way ®. Our culture is built on a strong foundation of treating people fairly, recognising talents of all our people and their different backgrounds, skills, perspectives, thoughts, beliefs and experiences. We are very proud, that while our people largely represent diverse beliefs and backgrounds, they share in our core values.

Wealmoor is a global, second generation family-owned fresh food business with deeply integrated growing operations and supply chains. The business was founded in 1973 and has a rich heritage in primary agriculture. We are focused on end-to-end management of key product areas including fresh speciality vegetables, tropical fruits, ingredients & herbs.

With a range of owned, out-sourced and close collaboration sourcing supply chain models located both globally and locally within the UK, today we operate across many developing countries* working with a significant number of partner suppliers* whilst employing over 3000 people within our own grower base.

Wealmoor is internationally recognised as one of the leading fresh produce brands in the UK, with an annual turnover of £162 million*, selling a range of speciality fresh fruit and vegetables including freshly prepared produce into the major retail, wholesale and food service sectors within the UK and Europe. It employs several hundred staff , within its packing facilities situated across Greater London and Warwickshire, and its farming operations across Surrey.

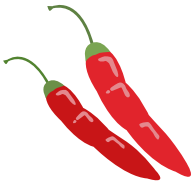
*Correct as of financial year ended 2 April 2022.

Products

The main product categories supplied by Wealmoor include:



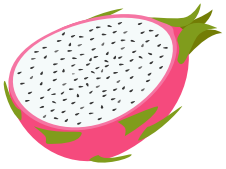
Speciality Vegetables



Ingredients



Herbs



Exotic Fruit

Wealmoor in Numbers 2021/22

Our products are sold into retailers, processing, food service and wholesale markets. Consumer channels include large and convenience stores, restaurants, food markets and online platforms.



5 Continents

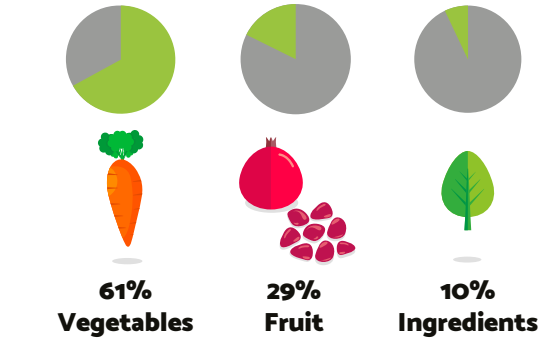


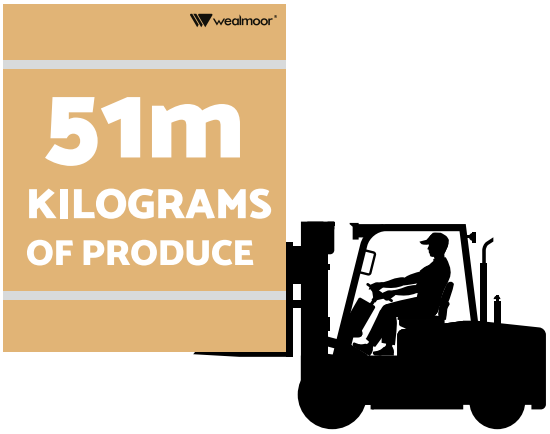
Forty Five Countries



3600 Individual Growers







We're recognised as one of the leading fresh produce suppliers.







wealmoor · EXPLORE FRESH® · LOVE ME® TENDER · herbfresh · Chillifresh® · RADVILLE GROWING · GAMBIA · NATURALLY · SAXON'S® ASPARAGUS

We're a multi-brand food group that's committed to generating positive economic, social and environmental impact.

Our Supply Chains

Our heritage and values established by our co-founders Rati & Vilas Dhanani have endured and remain central to maintaining our ability today to supply high-quality produce from communities that have been mobilised through the establishment and growth of agricultural activities.

We conservatively estimate that our business has positively impacted the lives of over 300,000 people worldwide and continues to do so.

We source produce from continents around the globe such as North and South America, the Indian subcontinent, Africa, Asia and Europe. A proportion of product is sourced internationally from owned sources with the remainder sourced from growers with whom we have established long-term, collaborative relationships.

Wealmoor works with suppliers who share the same values and who are conscious of the impact they have on their workers and local communities.

Our top 10 sourcing countries by gross sales value during the financial year 2021/22 were:

Top 10 Sourcing Countries
1. Kenya
2. Peru
3. UK
4. Egypt
5. Brazil
6. India
7. Spain
8. USA
9. China
10. Morocco

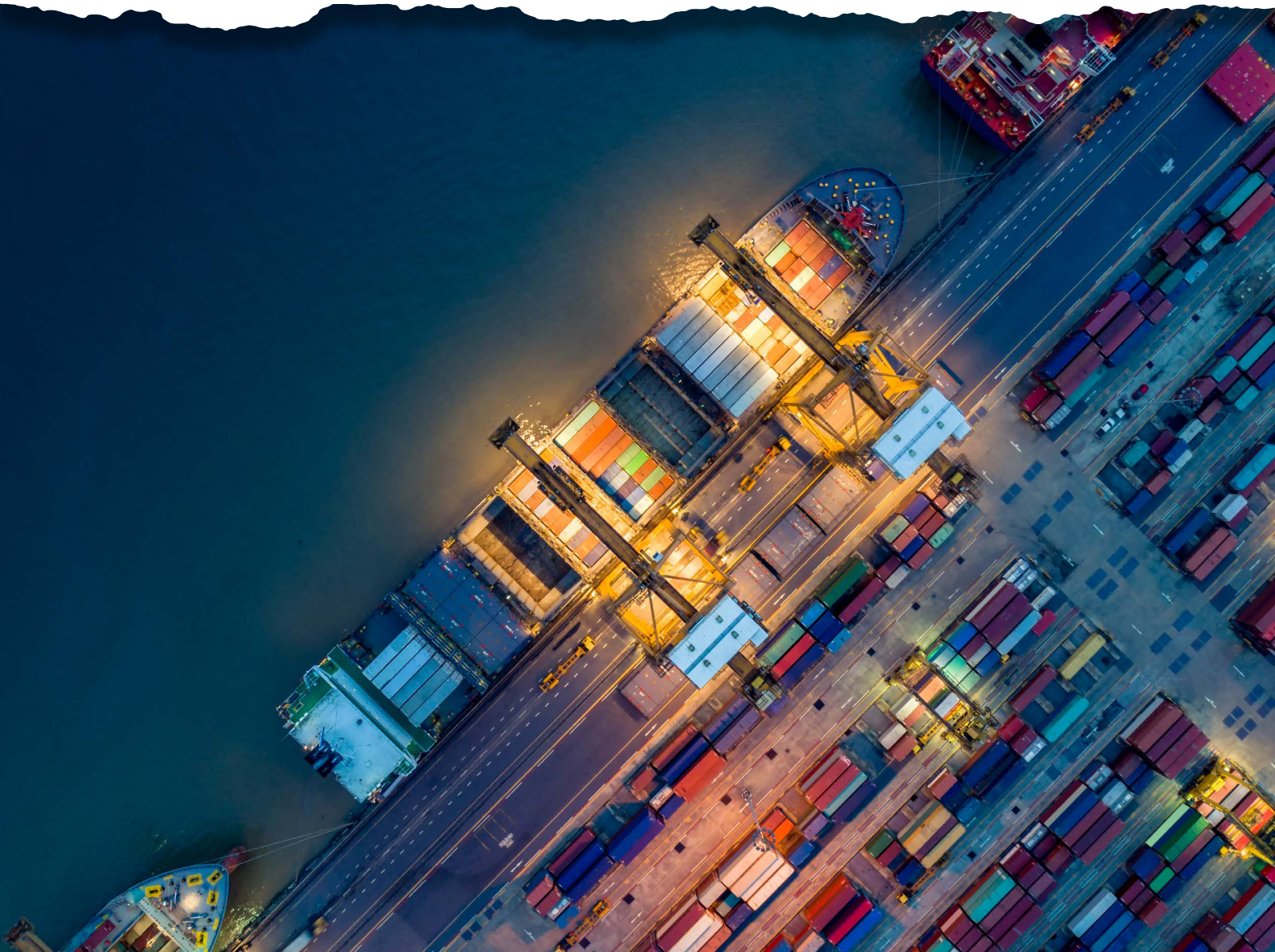
The above includes owned and non-owned sources



Supplier Tiers

Wealmoor categorises its grower base into tiers as a means to map its supply chains in order to support continuous improvement in transparency, identification of risks and accuracy of risk assessments.

Tier 1	Suppliers are organisations with whom we have ownership off whether wholly or in part or have a substantial strategic relationship.
Tier 2	Suppliers are those managed by our Tier 1 suppliers due to their limited scale.
Tier 3	Suppliers maybe managed by our Tier 1 suppliers but also include range of non-produce suppliers.



ESTABLISHED INITIATIVES

Business Policies, Procedures and Practices – Modern Slavery and Human Trafficking

Wealmoor is fully engaged in supporting and upholding human rights and has policies, procedures and practices in place to help safeguard against modern slavery, forced labour and human trafficking of any kind in its business and operations.

Provisions to tackle issues relating to modern slavery feature in our policies for our people and for working with our suppliers. These policies aim to ensure that people working for us, and for our direct and indirect suppliers, receive fair treatment and decent working conditions. Policies are prepared and implemented by our Executive Chair, Head of Technical and HR/People management.

1. Policies for Wealmoor's people

Wealmoor's internal policies and procedures are available to our people via our Intranet, HR/People team, SOP and during formal induction at start of employment. Complemented with refresher training program and toolbox talks.

2. UK Sites Compliance

All our relevant UK sites are registered on the Sedex platform and registered as "AB" membership indicating direct suppliers to retailers. We must have a completed annual self-assessment questionnaire (SAQ) to support the defining of a risk rating of low, medium or high.

Wealmoor reviews its SAQ results by site to ensure a low-risk is always maintained.

3. Recruitment and Awareness

Employment of casual labour through agencies is considered to be an area that is at high risk of slavery or human trafficking within the industry. Which is why one of the key points of difference at Wealmoor is that we favour direct recruitment, permanent employment of all our staff, despite additional time and resources involved. Use of casual labour through agency is restricted to managing particular peak weeks in British vegetable farming and managing high incidence of sickness absence, forecast accuracy or inherent national challenges in labour supply.

It is recognised that one of the greatest risks of modern slavery to the Wealmoor business is the occurrence of hidden third parties engaged in the exploitation of workers. Efforts to understand recruitment channels through mapping and training to improve the capabilities of those involved in recruitment to identify where there may be hidden intermediaries are two areas of focus for the coming financial year.

Wealmoor's recruitment process for people in our UK operations is initiated upon receipt of a fully completed application form or CV where available. Shortlisted candidates will always be invited to on site face to face interview jointly held between supervisory management and People team in a private and confidential meeting space. Robust checks carried out to ensure adherence to employment age and right-to-work laws, and best-practice standards maintained to vet identity, bank account and NI number.

Wealmoor's employment policies and Employee Handbook form part of our people induction process. Our people must confirm that they are committed to, and will participate in, training on these policies where required. Our people must behave in a way that reflects our business values.

4. Working Hours

Wealmoor complies with the requirements of the Working Time Directive (WTD) and achieves the points set out within the ETI Base Code (Point 6 – Working hours are not excessive). All supervisors have received briefings on working hours to ensure they have a full understanding of the requirements of the WTD and ETI Base Code and a commitment to manage people working hours to achieve these.

Wealmoor has policies and data reporting tools relating to voluntary overtime as a means to further improve people options while being able to document data more effectively to proactively help prevent any unplanned incidents of people working excessive hours. Incidents of planned excessive hours may be approved if closely monitored and controlled by Senior Leaders under rare exceptional adhoc circumstances only.

Wealmoor has supported this with people briefings that help to explain the principles of what working hours and overtime are and what their options are. Wealmoor will continue to review policies and reporting systems and improve where there are any opportunities to do so. Any changes to terms and conditions will continue to be mutually agreed with our people and fully documented.

5. Diversity and Inclusion

Wealmoor fully support diversity and inclusion within the workplace. As part of The Wealmoor Way®, our Responsible Business Plan, there is a commitment to help deliver sustainable development goal 5 relating to gender equality:

Wealmoor is close to having an almost equal split on gender with 53% of our people male** and 47% of our people female**. Further to this, Wealmoor has a significant range of different nationalities working within its UK sites.

** Correct to 5th April 2022

As a business, Wealmoor supports the celebration of diversity each year with an annual Diwali lunch which takes place at all UK sites. People are welcomed to come together and enjoy a traditional lunch and celebrate the festival of lights. It's a great opportunity for our people to learn about different cultures, and it has become one of the key events for our people.

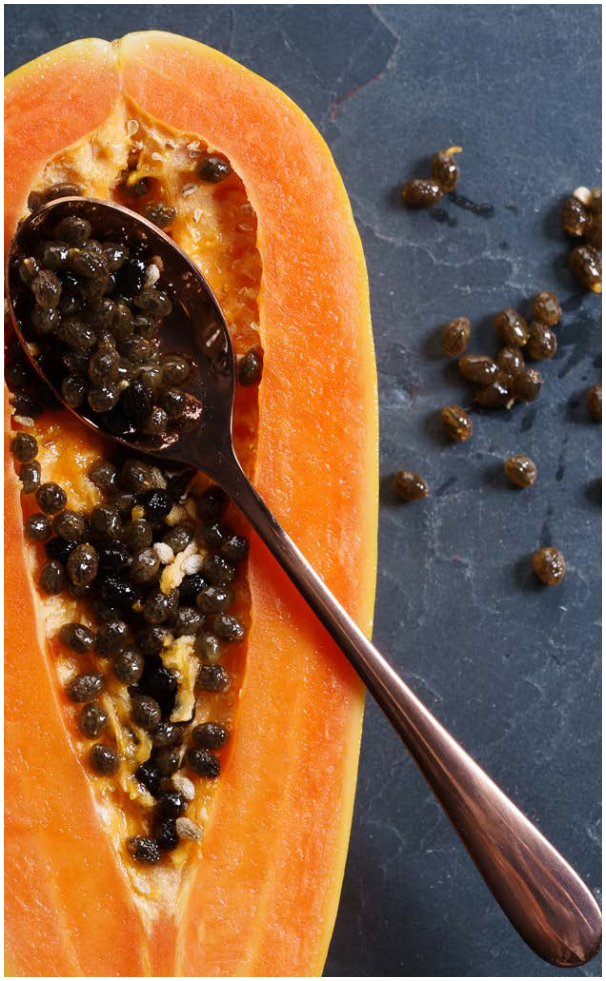
Wealmoor also engages in and helps to promote established diversity and inclusion events such as International Women's Day with communications via both internal and external platforms. But it doesn't stop there. Always seeking ways in which to impact UNSDG Wealmoor is both proud of and determined to participate in events, awareness and fundraising campaigns throughout the calendar year to promote the key messages and raise awareness for diversity and inclusion.

6. Training and Capacity Building

Raising awareness, identifying and tackling modern slavery and forced labour risks within our business and supply chain is the responsibility of the many. Wealmoor recognises that the ability for our people to do this must be supported through effective training and capacity building. Training is an area that Wealmoor continually look to focus on and further enhance.

All new starters must complete a comprehensive induction on Day 1 which covers modern slavery. This briefing highlights where to seek further information, guidance and access to internal and external confidential reporting.

Key people across our sites are trained in Modern Slavery Awareness, with content provided by Stronger Together.





7. Risk Assessment Management

Our risk assessment includes analysis of our key raw material suppliers (those that represent significant volumes or value to the business) against forced labour risks, using information from the Sedex management controls in our supply chain, industry expertise and commercial relationships. This ensures our ethical trading programme focuses efforts on areas of highest risk and where we have the leverage and potential to drive positive change.

As part of our ethical trading strategy, we have committed to seeking out and addressing all instances of forced labour by:

• Taking action to detect current and emerging indicators of forced labour.

• Providing coordinated approaches with suppliers that aim for effective, proactive and support for our suppliers with inadequate approaches to improve.

As a result, Wealmoor will be better prepared to prevent forced labour, having a positive impact on its people and communities within its local and global supply chains, to improve and trade with suppliers doing the right thing to protect workers.

8. Policies for Wealmoor Suppliers that supports our risk management activities

Wealmoor upholds its duty to ensure that supplier partners uphold ethical sourcing practices. To support this, a series of information sources and practical measures are utilised to help ensure that the business does everything practically possible to make certain that those working within the supply chains are able to fully exercise their human rights. These include:

All growers supplying product into Wealmoor are subject to comprehensive due diligence checks, which will include most if not all of the following:

Wealmoor Technical Supplier Approval Pack (WTSAP)
The pack covers a number of areas relating to human rights and ethical standards such as food safety and ethical compliance.

ETI Base Code
Suppliers must formally commit to work to the principles of the ETI Base Code, which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

Supplier Ethical Data Exchange (Sedex)
All suppliers must be registered on the Sedex platform and registered as "B" members indicating direct suppliers to Wealmoor.
All Tier 1 suppliers must have a completed annual self-assessment questionnaire (SAQ) to support the defining of a risk rating of low, medium or high.

Wealmoor reviews suppliers' SAQ results to ensure a low- or medium-risk status is maintained. Any supplier that shows a high-risk rating will be supported by Wealmoor to reduce this to an acceptable level as part our commitment to develop good farming practices, human rights and ethical standards and to empower local communities within developing countries

Any supplier that is unwilling or unable to work with Wealmoor to reduce their high-risk rating will be warned in advance of actions taken if there is no change and, if necessary, delisted as a supplier of goods into the business.





SMETA Audits

Where a SMETA audit is required (based on Sedex risk rating and/or customer requirements), this will be communicated accordingly. The type of audit will be stated by Wealmoor and will follow either a second- or third-party audit protocol. Audits are conducted by trained and certified auditors.

Any sites with non-conformances upon audit are closely monitored until fully compliant and their risk assessments updated.

Wealmoor Visits / Audits

These are undertaken on the basis on basis of the outcome of the Wealmoor risk assessment, at the request of technical or procurement functions or customers and/ or as a result of industry events. Wealmoor appreciate the need for support visits in addition to third-party audits to improve understanding and the sustainability of action(s) taken.

Wealmoor Ethical Sourcing Strategy

The sourcing strategy details the requirements of Wealmoor and the grower in relation to ethical compliance including the supplier approval and on-going compliance process.

Wealmoor Supplier Risk Assessment

The risk assessment is reviewed and updated on an annual basis unless incidents and/ or industry events require a more frequent review to be undertaken. The risk assessment considers a number of factors, including ethical compliance, to categorise growers into low, medium and high risk.

In addition to the scheduled annual review, the risk rating of the Wealmoor grower base is reviewed as and when updated information is supplied for the various considered factors i.e. updated SAQ result, updated SMETA audit results etc. The outcome of the risk assessments is used to support the annual grower audit/visit plan with the aim of supporting growers to improve compliance through enhanced understanding of requirements and resolutions.



9. Reporting and Communication

Wealmoor understands and appreciates the benefits of sharing updates to both internal and external stakeholders on items relating to ethical compliance. Within Wealmoor, there are a number of ways in which information on the subjects of modern slavery and ethical compliance may be shared including:

- Business Briefings
- Board Meetings
- Senior Leadership Team Meetings
- Function / Depot Management Meetings
- People Communication Forums
- Trade Union Meetings
- Wealmoor Intranet
- Memos
- Toolbox Talks
- Noticeboards

Collectively these help to ensure that the relevant information is shared to those that we employ while also ensuring those at more senior levels within the Wealmoor business have the detailed information available to enable effective action to take action where/ if required.

Reporting systems are an area which have been identified by Wealmoor as an opportunity to further enhance and, in addition to training, will be a key focus area for action in the 2022/23 financial year.



2022/23 COMMITMENTS

We are here to make a positive difference and believe in long term, collaborative and rewarding relationships with our customers, growers and people. Wealmoor works with suppliers who share the same values and who are conscious of the impact they have on their people, local communities and the environment.

Even prior to the Covid-19 pandemic our industry faced a range of disruptive elements. Climate change and natural disasters, rapidly changing in-country dynamics and geo-political factors have all required careful management over a number of years. These factors have remained, however, the Covid-19 pandemic has further tested the rigour of these supply chains in an unprecedented way.

This has been countered by our unique and detailed end to end understanding of the entire supply chain, the resilience borne through our experienced teams, our values and the unique levels of integration with our grower partners, which has all been instrumental in our continued ability to deliver outstanding service, unparalleled growth and, substantially improving quality whilst doing so.

Our people are key to this. We take immense pride and comfort in the mindset, skills, knowledge and resilience of our operations colleagues, supervisory, management, leadership and head office staff who are actively complemented by new colleagues enhancing awareness, continuous improvement and diversity in our thought and ways of working. We passionately believe in directly employing our people in packing facilities for mutual long term benefit. Through our Brand Management & Operational Excellence programmes we have continued to ensure there is complete focus in delivering high quality products with full coordination and awareness of customer requirements across the supply chain.

Wealmoor is committed to delivering the following to further improve the business's ability to reduce the risk of modern slavery, better identify issues of modern slavery and improve the awareness of modern slavery risks and impacts:

- Close out outstanding commitments from the previous report. Enhance and expand training to key personnel in the business relating to modern slavery and/or ethical compliance.
- Establish effective reporting tools which can be used both within the Wealmoor business and externally.

While the above outlines how Wealmoor intends to tackle the issue of modern slavery and human trafficking, it is recognised that there is always more that can be done. Wealmoor remains committed to being recognised as an organisation that has a truly positive impact on its people and communities within its local and global supply chains.

This Modern Slavery Statement is annually reviewed by LFH Board of Directors.