3.24 Winterwood Farms Limited Modern Slavery & Human Trafficking Statement for Financial Year 2021/22 **Issue 5**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Winterwood Farms Limited 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. Winterwood Farms Limited has a zero-tolerance approach to any form of modern slavery which is shared on our website. We are committed to acting ethically and 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 and supply chain

Winterwood Farms Limited produces a wide range of fruit from our farms in the United Kingdom, France, Poland, and South Africa, with nearly 2,000 hectares of combined cropping area. Our farms allow us to be one of the largest growers of Blueberries in Europe and Southern Africa.

Alongside our farming operations, we also pack fruits from around the world at our packhouse in the UK. These fruits are mostly marketed to various multiple retailers and supermarkets in the UK.

We purchase all our fruit from the farms on which they are grown, from our farms, or through reputable marketing agents. We have very close, successful and long-term relationships with all our suppliers.

Policies

The Company operates several internal policies to ensure that business is conducted ethically and transparently. These include:

1. Ethical Trading Policy: The company is committed to ethical trading. In addition, a program of external ethical auditing is in place including publishing the results of third-party audits on SEDEX (Supplier Ethical Data Exchange) website.
2. Worker Welfare Policy: The company has a duty of care to all its employees. The company conducts an extensive induction programme before employees commence work which covers health and safety, job descriptions, pay, and training.
3. Bribery and Corruption Policy: The Company prohibits bribery or corruption in any form whether direct or indirect.
4. Human Rights Policy: The company has human rights policy covering employment, harassment, discrimination, accommodation, harassment in accommodation, violation of the human rights policy, and consequences.
5. Confidential Whistleblowing Policy: The company has a confidential whistleblowing policy designed to make disclosures without fear of retribution.
6. Equality, Diversity & Inclusion Policy: The company has a policy not to discriminate against people and provides equal opportunities to all.
7. Forced Labour Policy: The company has a policy against all forms of forced labour which covers prison labour, bonded labour, coercion, and child labour.
8. Recruitment Policy: The recruitment policy aims to define the processes by which the company recruits and selects its employees.
9. Remediation and Grievance Policy: The company has a policy on the reporting and remediation of negative impacts on human rights caused by its operation and supply chain.

Risk Assessment

Winterwood Farms Limited has risk assessed our fruit suppliers of goods for resale. This is the first year that the company has formerly conducted this exercise. This understanding has allowed the company to evaluate specific labour risks by country that embody wherever relevant the chance of forced labour.

To help with maintaining the risk assessment, Winterwood Farms Limited currently monitors its supplier's packhouses and farms via SEDEX. Using SEDEX and the transparency provided by the platform, we can monitor roughly 5000 workers within our supply chain.

The use of labour providers, seasonal workers and agency labour throughout our supply chain is an area that will continue to be our focus during the next financial year, given the potential risk of modern slavery, labour exploitation and the impact of Brexit.

Due diligence

All employees at Winterwood Farms Limited's farm and packhouse in the United Kingdom are given a written contract of employment at the start of their employment.

In 2021 the company started using the agency called Pro-Force to provide a small number of staff to help with the labour shortage. Pro-Force is a registered GLAA labour provider and follows best practice guidance for ILO, ETI, and GLAA licensing standards. Pro-Force is a Stronger2gether business partner and is actively involved in modern slavery initiatives. Winterwood Farms Limited conducts modern slavery questionnaires 1 on 1 on all agency workers during induction to look for signs of modern slavery and also conducts an annual audit on Pro-Force.

Winterwood Farms Limited recognises there is scope in our supply chain for slavery and human trafficking to occur. Winterwood Farms Limited operates a supplier approval procedure for our fruit suppliers and maintains a preferred supplier list.

We conduct due diligence on all potential suppliers before allowing them to become a supplier. The company requires all fruit suppliers to register on SEDEX (or with SIZA for South Africa) and complete the self-assessment questionnaire (SAQ). The company assesses compliance to national and international standards, through second-party auditing and third-party auditing to SMETA protocol. Suppliers are required to operate to the Ethical Trading Initiative (ETI) principles which the company offers support where needed.

Training and awareness

Key members of staff have attended the Stronger2gether workshop to understand the signs of modern slavery and what to do if they suspect that it is taking place within our business or supply chain. Staff that conduct inductions and interviews have completed Stronger2gether trafficking and modern slavery e-training course. During induction new staff are made aware of modern slavery using resources provided by Stronger2gether. A modern slavery questionnaire is completed during induction 1 on 1 with the new employee in the employees' language. The modern slavery questionnaire is conducted by our trained inductors who are trained to spot signs of modern slavery. We currently have a total of 15 staff who have attended Stronger2gether training.

Awareness will be raised through posters and visual prompts in our employee areas.

Our progress

Winterwood Farms Limited set an objective in our previous statement which was to increase the number of staff attending Stronger2gether training. This objective was completed and during this financial year, 3 new staff members have completed the Stronger2gether e-training course.

Our plans

Winterwood Farms Limited has defined some specific targets in this statement to complete for the coming financial year.

Our business and supply chain: Create a flow diagram map of our goods for resale supply chain and include it in our next statement.

Our policies: Continue to review and develop our current policies in line with emerging modern slavery and human trafficking issues.

Training and awareness: Further increase the number of staff who attend Stronger2gether training, specifically staff that visit our suppliers regularly.

Risk Assessment: Continue to refine and develop the risk assessment. The company will also continue to engage with its suppliers of goods for resale on modern slavery and human trafficking risks within the supply chain. The company will engage with goods not for resale suppliers to risk assess the risk of forced labour.

Board approval for this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the financial year ending 30/04/22. This statement has been approved by the board of directors.
Name: Stephen Taylor (Managing Director)
Date: 30/06/22