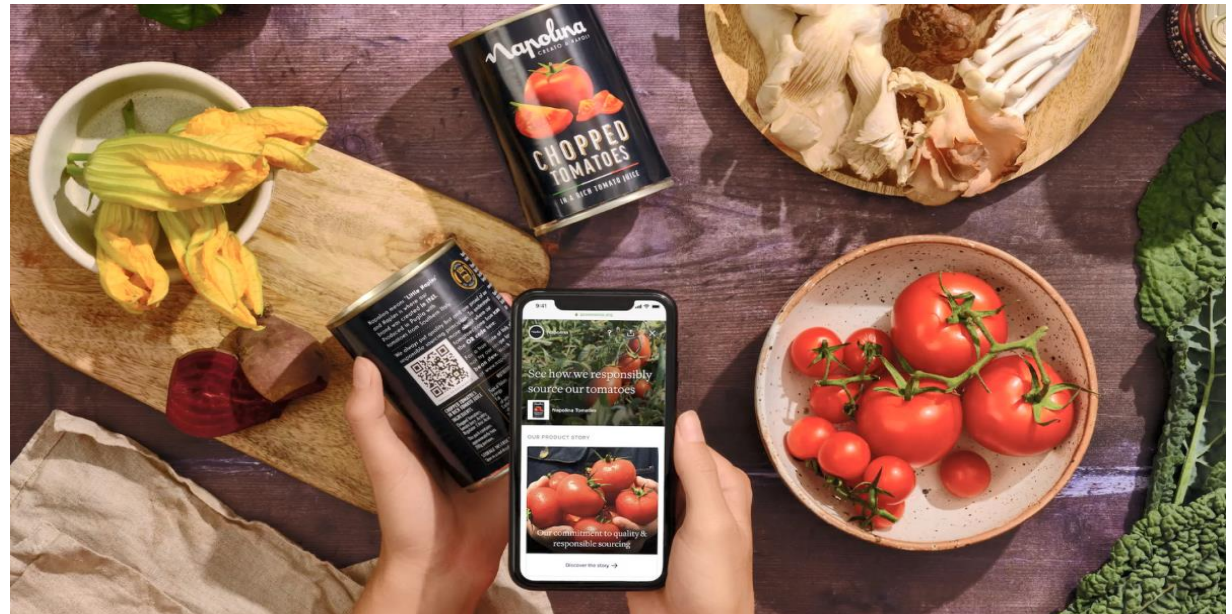




MODERN SLAVERY ACT STATEMENT

for the Financial Year ended 31 March 2022



This statement describes the activities Princes is undertaking to prevent slavery and human trafficking in our business operations and supply chain.

It has been published in accordance with the UK government's Modern Slavery Act (2015) and other modern slavery-related legislation in jurisdictions where Princes is operational.

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INTRODUCTION

What is modern slavery?

Modern Slavery is a crime and a violation of fundamental human rights. Modern slavery can take many forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which results in common deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We recognise that modern slavery is a global issue and is linked to the rise in global migration. Slavery exists in every region of the world and in most types of economies, whether industrialised, developing or transitional. No industry or sector can be complacent or be considered immune.

OUR VISION

Princes can trace its roots back to 1880 and the Princes brand was established in 1900. The trust we have established over this time with customers and consumers is something we are proud of and is reflected in our company vision of ***'Proudly helping families to eat well, without costing the earth'***.

Our aim on ethical trading and human rights is to ensure that there is no modern slavery in our supply chain.

Our products should not only be sourced responsibly and ethically but should also contribute positively to the lives of those who produce and deliver them.

We will continue to be a leading voice in the food and drink industry in the fight against modern slavery. The issues are global, complex and unfortunately, there is no quick fix; however, we firmly believe that if we work collaboratively with our supply chain partners, and continue to be open about our progress, we can help to end modern slavery and human trafficking in our supply chain.

I, Tatsuo Okura, hereby certify that the information contained in this statement is factual. This statement has also been approved by the Board of Princes Limited.



A handwritten signature in cursive script that reads "Tatsuo Okura".

Tatsuo Okura
Chief Corporate Officer
September 2022

ABOUT PRINCES

When it comes to food and drink, Princes has been caring about taste, quality and families for over 140 years.

The Princes Group has over 7,000 employees worldwide, and revenue of £1.6bn with offices and production sites in the United Kingdom, Netherlands, Italy, Poland, France and Mauritius. Since 1989, we have been a wholly-owned subsidiary of Mitsubishi Corporation.

We provide nutritious, responsibly sourced food and drink enjoyed by millions of families every day.

In addition to our fully owned UK manufacturing sites and our Italian tomato processing site, held through our subsidiary Princes Industrie Alimentari S.r.L (PIA), we have joint ventures that complement our production processes:

- Princes Tuna (Mauritius) Limited (PTM): A joint venture with Seafood Hub Ltd, IBL Ltd and the Mauritian State Investment Corporation;
- Edible Oils Limited (EOL): A joint venture with Archer Daniels Midland, operating two edible oil bottling plants in the UK;
- EOL Polska SP. Z.O.O.: A joint venture with Archer Daniels Midland, operating an edible oil bottling plant in Poland.

Further details of our business and operations can be found at:

<http://www.princesgroup.com/>

OUR VALUE CHAINS

Princes' global supply chains are complex and extensive. Our suppliers provide both finished goods and raw materials for manufacturing across all of our core product areas, which include fish, meat, fruit, tomatoes, pasta, beans, vegetables, edible oils and a broad range of soft drinks.

We take a partnership approach with our key suppliers, seeking to foster long term supply agreements in order to provide the security, integrity and quality we, our customers and consumers require.

We divide our direct supply chain into five categories:

1. Fully owned or joint venture production sites;
2. Third party suppliers who manufacture finished goods on our behalf;
3. Ingredients which go into food and drink we produce at our manufacturing sites;
4. Packaging suppliers;
5. Suppliers of Goods and Services Not for Resale (GNFR) & outsourced service suppliers (such as logistics, catering, cleaning and security).

SUPPLY CHAIN TRANSPARENCY

As part of our commitment to supply chain transparency, since 2020 we have published details of all our finished goods supply chain showing the site location, with a breakdown of workers, gender split and the presence of an active trade union or worker committee.

Every year we have continued to offer this level of transparency and continued to widen its scope, now publicly disclosing details of our tier one (direct) suppliers for packaging, ingredients and finished goods. A copy of the detailed supply chain map can be found at: www.princesgroup.com/csr

As part of championing gender equality and vulnerable workers within our supply chain, we also continue to share disaggregate gender and temporary/agency worker data. This is in addition to visibility of where an active trade union and/or worker committee exists. At a glance, our supply chain map shows:



Source: Supplier Ethical Data Exchange (Sedex) for all Tier one (direct) suppliers to Princes of finished goods, packaging and ingredient suppliers where data is available as of 31st March 2022



United Nations Sustainable Development Goals (SDGs)

The United Nations Sustainable Development Goals (SDGs) have been developed to make the world more sustainable by 2030 in challenges as diverse as ending poverty to tackling climate change.

Princes supports the aspirations of the SDGs and we have identified the specific Goals where we think we can make a real contribution related to our areas of expertise and main areas of operation.

OUR APPROACH

At the centre of our approach to tackling risks of modern slavery and upholding human rights are a number of internationally recognised declarations, standards and codes. These include:

- The United Nations Universal Declaration of Human Rights;
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- The United Nations Guiding Principles on Business and Human Rights (UNGPs);
- The Base Code of the Ethical Trading Initiative (ETI).

Princes has a well-developed and embedded policy framework that addresses human rights, and specifically the risk of modern slavery. We are committed to acting ethically and with integrity in all our business dealings, and to implementing and enforcing systems and controls to prevent modern slavery in our business and value chain.

We are also committed to ensuring there is transparency in our approach to tackling modern slavery in our own business and through our value chain.

We expect the same high standards from all our suppliers and business partners and require our suppliers to comply with our policies and codes to combat the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, including both adults and children. We expect our suppliers in turn to cascade these principles and hold their own suppliers to the same high standards.

Several mechanisms are used to engage with our supply partners to maintain regular contact and seek assurances that they are committed to adopting best practices in relation to the rights of their workforce. We also recognise the benefits of working collaboratively with our supply partners to address their concerns and build up capacity and understanding of complex issues which address the root cause of modern slavery risks.

GOVERNANCE

Our Chief Corporate Officer has ultimate responsibility for ensuring Princes meets its ethical trading and human rights responsibilities. He is supported by the Board of Directors, the Director of Corporate Relations and our Sustainability Team

The Princes Board are updated regularly on our human rights progress and provided with an overview of key legal and industry updates. Within such meetings the opportunity to raise any issues requiring their approval, or guidance, is discussed.

The following departments are responsible for carrying out the day-to-day implementation of policies and procedures that support Princes in meeting its human rights and ethical trading responsibilities: Commercial (Procurement), Sales, Human Resources, Legal, Technical, Operations and Corporate Relations.

Close collaboration with these teams is essential to ensure decisions and practices are aligned with our ethical trade goals. We hold regular Ethical Steering Group (ESG) and Ethical Implementation Team (EIT) meetings and our ESG committee includes Director-level representatives of the functions named above while our EIT includes senior manager-level representatives. The ESG and EIT working groups play a leadership and advisory role in our human rights agenda.

OUR POLICIES & CONTRACTUAL CONTROLS

Our policy framework addresses human rights, and specifically the risk of modern slavery, and is supported by a programme of continuous training.

1

Ethical Trade & Human Rights Policy

Our Ethical Trade & Human Rights Policy sets out specific commitments and obligations to the people and communities in our supply chain.

It is a requirement for suppliers to comply with (i) all applicable local and international laws, which would include those relating to labour used in the supply of finished goods and raw materials, and (ii) the principles of the Princes Group Code of Conduct, which incorporates respect for human rights and the Princes Group Ethical Trade & Human Rights Policy.



2

Contract & Migrant Worker Policy

Recognises the risks around workers being charged excessive fees, given misleading information about a job offer, or having documents retained.

Princes supports the Employer Pays Principle which states that: 'No worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer'. Princes also supports the Dhaka Principles for Migration with Dignity which provides a set of key principles that employers and recruiters should respect in order to uphold the human rights of migrants.

Our policy is intended to help suppliers safeguard the rights and welfare of Migrant and Contract Workers in their supply chains and also manage the risks and responsibilities associated with the indirect employment of Migrant and non-Migrant Workers.

3

Code of Conduct

The Princes Group Code of Conduct provides guidance to employees on local laws and global standards and all employees must use it as a guide in their daily operations, be aware of their responsibilities as a member of the Group and review the relevant laws and internal company rules ensuring that they conduct themselves with integrity.

Our Group Code of Conduct also explains how violations of our Code of Conduct can be reported, including the ability to access independent Legal Counsel if required.

5

Group Buying Policy

Our Group Buying Policy outlines the requirements for our internal procurement function to ensure that the sourcing of products is made from suppliers who have been internally approved across a number of areas, including an assessment of their ethical trade credentials and level of transparency.

4

Recruitment Policy

All of our new employees are subject to pre-employment checks to confirm their identity and right to work in the UK. Where recruitment agencies are used, we require they comply with all legal requirements as a minimum.

6

Standard Terms and Conditions of Purchase

It is a provision in our Standard Terms and Conditions of Purchase that sub-contractors must be approved by Princes and must comply with our Ethical Trade & Human Rights Policy.

TRAINING ON THESE POLICIES

Princes understands the importance of building compliance capability across our business, and we are continuing to work hard to embed our approach and engage our employees.

We continue to use the Modern Slavery Act (2015) as an opportunity to embed greater understanding of human rights within our supply chains, and to extend this awareness as far down our supply chain as possible.

Our Code of Conduct training – our way of ensuring that all employees fully understand what is expected of them – is delivered both online and in-person for our colleagues at manufacturing sites.

This training is mandatory and covers all areas of our Code, with specific emphasis on key topics reinforced by scenario-based examples.

Our Code of Conduct training is refreshed annually to ensure all materials reflect the latest insights and expectations.

Anti-Slavery Awareness Day: Raising Colleague Awareness

Princes again marked the UK's **Anti-Slavery Awareness Day** on 18th October through a number of powerful case studies shared with colleagues, based on modern slavery incidents which have occurred in countries within which Princes operates. By raising awareness of the issues, and mechanisms by which concerns can be escalated, we will continue to play our part in eliminating modern slavery.



Modern Slavery: It's Closer Than You Think

Modern slavery is a crime and a violation of fundamental human rights. Victims are trapped in servitude, which they were deceived or coerced into, and cannot leave.

Princes are proud to be a leading voice in tackling modern slavery.

Anti-Slavery Awareness Day, 18th October 2021



Scan to find out more



MODERN SLAVERY
It's closer than you think!

Someone in slavery might:

- Appear to be under the control of someone else & reluctant to interact with others
- Have no personal identification on them
- Have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work
- Be unable to move around freely
- Be reluctant to talk to strangers or the authorities
- Appear frightened, withdrawn, or show signs of physical or psychological abuse
- Get dropped off and collected for work, always in the same way, especially at unusual times i.e. very early or late at night.

If you spot any of these signs contact:

- Modern Slavery Helpline **0800 121 700**
- Mistreatment of workers Gangmasters & Labour Abuse Authority **0800 432 0804**, or by email intelligence@gla.gov.uk
- Contact Crimestoppers on **0800 555 111**
- Police on **999**.



Scan or visit to find out more princesgroup.com/csr



...Handy made a significant amount of money while the victims - aged from 17 to a man in his 60s - worked for just 50 pence an hour...."

West Midlands police report, Operation Fort, 2021





Certificate of achievement for:

Princes Group

In recognition of successfully achieving:

**Corporate Ethical
Procurement & Supply**



Malcolm Harrison
Group CEO
Chartered Institute of Procurement & Supply
Easton House, Easton on the Hill, Stamford,
PE9 3NZ, UK

Achieved: 1 March 2022

Valid for 12 months from achievement date

0800 / VALID TO
01.03.2023

International Listing on CIPS' Ethics Register

Since 2019 we have held the Chartered Institute of Procurement and Supply's (CIPS) Ethics Mark – a certification which requires companies to adopt CIPS' Code of Ethics, make a public commitment to sourcing ethically and to train and test all staff responsible for sourcing and management of suppliers.

We were delighted to retain our recognition via the internationally published listing on the CIPS Corporate Ethics Register.

To achieve this recognition, procurement colleagues have demonstrated their respect and awareness of international standards against criminal conduct, including bribery, corruption, fraud and human rights abuse, protecting Princes from potential supply chain malpractice.

The opportunity to retain this certification has helped generate interest and engagement from the Procurement Team. The behaviours learnt from the training can be combined with our supplier management approach to increase the number of purchasing and sourcing decisions which consider ethical trading and human rights.



OUR RISK ASSESSMENT APPROACH

Risks of modern slavery are dynamic and can evolve quickly. As a result, we regularly assess and respond to risks in our business and wider supply chain.

Our approach to assessing risk, monitoring standards and developing actions to address issues within this wide, varied and complex supply network is driven through our Human Rights programme, including Human Rights Impact Assessments (HRIAs) which are based on our geographic markets around the world.

Each HRIA considers all aspects of our value chain, from farming activity, through to our own operations with the specific actions and key performance measures to monitor progress differing to reflect each area of risk.

Since 2017 we have also used our own risk assessment to assess potential human rights risks by considering the country of origin from where we are sourcing products or raw materials from. We use the Food Network for Ethical Trade (FNET) risk ratings to inform this, combined with our own understanding of labour rights and human rights risks in key sourcing countries, learning from our supply partners and their teams on the ground.

Within our risk assessment we consider the type of labour (seasonal, permanent, agency, migrant), any known industry human rights risks, any information from previous independent social audits and independent country risk ratings on human rights obtained from a variety of data sources.

We then overlay our procurement relationship with the supplier / grower / producer (direct, through an association, through an agent, through a co-operative) to understand the leverage we have to prioritise and respond to these risks.

As well as developing our own risk assessment, Princes are members of the Supplier Ethical Data Exchange (Sedex), a membership organisation dedicated to driving improvement in responsible sourcing and business practices across global supply chains. We use Sedex to assess and manage compliance across our manufacturing sites and direct suppliers.

Throughout the year we have been working to expand our auditing programme to cover higher-risk ingredient and packaging suppliers as one part of supporting our risk assessment approach, in addition to higher risk indirect suppliers, also known as goods and services not for resale.



Overlaying climate change risks onto our human rights risk assessment

Climate change and environmental sustainability have been identified as key challenges for our business and our supply partners.

We recognise the interconnectivity of climate change, environmental sustainability and human rights and have therefore started to overlay risks associated with climate trends onto our human rights risk assessments.

According to the United Nations, two million people have died as a result of a five-fold increase in weather-related disasters in our lifetimes, while the UN Refugee Agency (UNHCR) estimates that 21.5 million people are displaced by climate change-related disasters every year – more than twice the number of those forced to flee conflict or violence.

Climate change will continue to pose complex challenges to global food security too. While longer growing seasons in the northern hemisphere could prove favourable for growing crops, more extreme weather events, such as droughts and floods, could damage crops and lead to the interruption of food distribution systems.

Princes are involved in the Ethical Trading Initiative's Climate Change Advisory Group, working with companies, trade unions and non-governmental organisations to link environmental sustainability with human rights implications.

We have also pledged to become a carbon neutral business by 2030, marking the start of our journey towards becoming net zero across our entire value chain.

Find out more at our ETI guest blog available at:

<https://www.ethicaltrade.org/blog/why-climate-change-major-threat-to-fundamental-human-rights>

Sources:

<https://news.un.org/en/story/2021/09/1098662>

<https://www.unhcr.org/uk/news/latest/2016/11/581f52dc4/frequently-asked-questions-climate-change-disaster-displacement.html>



The screenshot shows the top of an ETI blog page. The header includes the ETI logo and tagline 'For workers' rights. For better business.' Below the header is a navigation menu with links for 'About ETI', 'ETI Base Code', 'Programmes', 'Join ETI', 'Training', 'Resources', and 'Issues'. The main content area features the article title 'Why climate change is a major threat to fundamental human rights' in a large, bold font. Below the title are social media icons for Facebook, Twitter, and LinkedIn. The author's name 'Paul Williams' and the date '8 December 2021' are displayed. A large photograph of several fishing boats docked at a pier at night is shown. Below the photo, the text reads: 'From Europe's worst heatwave on record in 2003, which claimed 30,000 lives, to the more recent and unprecedented levels of drought, floods and wildfires across the northern hemisphere, the impacts of climate change are no longer subtle and cannot be ignored.'



MONITORING OUR PROGRESS

To assess the impact of the steps we have taken, the following Key Performance Indicators are reviewed and reported on across the Group:

Reference	Measure	Target by 31st March 2022	Result	Commentary	
1	Princes-owned or Joint Venture Sites	% of Princes-owned or Joint Venture sites ¹ with a third-party independent ethical audit within the last 24 months.	100%	100%	
2		% of Princes-owned or Joint Venture sites with zero overdue and outstanding Business Critical or Critical Non-Conformance ² from their most recent third-party ethical audit.	100%	92%	One site, Erith, has a critical non-conformance which is in the process of being resolved.
3		% of Princes-owned sites with a Human Resources Team that have completed the Stronger Together training ³	100%	100%	
4		% of Princes-owned sites that have completed the Stronger Together Tackling Modern Slavery in Business Implementation Checklist ⁴	100%	100%	
5		% of Princes colleagues who have successfully completed the Princes Ethical Trading & Human Rights Compliance Training programme ⁵	100%	100%	
6		% of Commercial (Procurement) colleagues who have successfully completed the Chartered Institute of Procurement & Supply (CIPS) Ethics Test ⁶	100%	100%	
7	Princes Supply Base	% of all Tier 1 (Direct) ⁷ Finished Goods, Packaging and Ingredient suppliers who are registered on an independent ethical platform ⁸ and linked to Princes to share audit information.	100%	100%	
8		% of all Tier 1 (Direct) Finished Goods, Packaging and Ingredient suppliers who have completed an Ethical Self-Assessment Questionnaire to 100% which is visible to Princes.	100%	98%	Two sites currently have an Self-Assessment Questionnaire at 98%.
9		% of all Tier 1 (Direct) Finished Goods suppliers who have commissioned, and shared the findings, of a third party ethical audit within in the past 24 months.	100%	88%	11 sites have not undertaken an audit within the last two years.
10		% of all suppliers (Direct and Indirect) that share audit information with Princes with zero overdue and outstanding Business Critical or Critical Non-Conformance.	100%	99%	15 suppliers out of our total 1139 suppliers currently have a Critical Non-Conformance which is overdue and outstanding, though there is an action plan in place with Princes on how to address this.
11		% of all Tier 1 (Direct) suppliers with at least one overdue and outstanding Business Critical or Critical Non-Conformance who have a time-bound action plan to close out the Non-Conformance(s).	100%	100%	

Notes:

1: Based on eleven sites: Belvedere, Bradford, Cardiff, Erith, Glasgow, Long Sutton, Princes Industrie Alimentari, Princes Tuna (Mauritius) Marine Road, PTM Riche Terre, Szamotuły and Wisbech.

2: A severe breach of an ETI Base Code or local law resulting in an issue which presents imminent risk to workers.

3 & 4: Further details can be found at: <https://www.stronger2gether.org/product/stronger-together-employer-implementation-checklist/>

5: Please see pages 6 and 7 for more details.

6: Please see page 8 for more details.

7: Princes defines tier one, or direct, suppliers as those with which we have a direct contracting relationship.

8: This includes the Sedex, SAI or Amfori (BSCI) platform.

PRIORITY SUPPLY CHAIN RISKS

Our risk assessment process has identified the following priority products, services or raw materials from seven sourcing countries:

Priority Products, Services or Raw Materials	Priority Sourcing Countries
Basa	Brazil
Corned Beef	China
Herbs and spices	Indonesia
Orange Juice	Italy
Pineapple	Thailand
Poultry	United Kingdom
Shrimp	Vietnam
Temporary labour (for our manufacturing sites)	
Tomato-related products	
Tuna	

These priority areas may change as we go through the process of engaging with our suppliers and as we learn more about the challenges that workers in these supply chains face.

Reinforcing ethical working practices and promoting fair economic conditions

In 2019 Princes signed a ground-breaking partnership with Italy's leading agricultural union, Coldiretti, to enhance social sustainability practices across the tomato supply chain.

Through the renewal of our agreement with Coldiretti, which also now includes Oxfam Italy in an advisory capacity, a new framework has been developed to enhance the ethical, environmental and economic value of the Italian tomato supply chain. Within this is a commitment from Princes to guarantee three-year supply contracts to enhance financial stability for Coldiretti growers, and work with the University of Foggia to ensure that the pricing of tomatoes reflects the true costs of growing and harvesting to enable the long-term sustainability of the industry.

At our Foggia plant – the largest industrial site in Europe – Princes processes around 200,000 tonnes of fresh tomatoes from the Apulian district annually and is supplied exclusively by producers who must hold Global G.A.P. GRASP or SA8000 certifications.

In addition, all PIA's tomato growers must be enrolled on the 'Rete De Lavoro', a Ministry of Labour public register of businesses fully compliant with labour and human rights legislation and transparent payment of wages.

The agreement was officially renewed and signed in December 2021 at a ceremony in Rome attended by the British Embassy.



Continuing to enhance human rights due diligence in our fruit supply chains

Around 2,500 direct suppliers from more than 140 countries provide us with the raw materials, expertise and other resources that allow us to produce great brands and products.

We rely on a number of agricultural raw materials from farms all over the world, ranging from highly mechanised farms over thousands of acres in Europe and North America, to family-owned smallholder farms in Asia and Africa which may be less than a couple of hectares in size.

We understand that different farm types and locations, involving a wide variety of types of employees (permanent, temporary, contract and seasonal), pose varying degrees of risks in terms of modern slavery. We therefore need to tailor our approach to assess standards and manage issues, working with suppliers – even if that means working with smallholder farms.

Throughout the year we have continued to enhance the transparency around our fruit supply chains in order to obtain visibility of the number of growers, the number of workers at grower level, the worker contracting type and an assessment of ethical or human rights risk assessment.

This remains a challenge for an organisation like Princes who don't have resources on the ground or access to a team of Agronomists in all supply chains to support building up visibility.

We are also part of a journey on raw materials for ambient grocery products that was started several years earlier for fresh products.

The nature of ambient supply chains can mean frequently changing farms, regions or even countries and very few farms whose raw materials end up in processed food have ever been approached to engage in transparency initiatives. This is changing and we are establishing a leading position in our approach with suppliers, encouraging them to engage with us and join us in our transparency journey

We are now working with our suppliers and growers in lower tiers of the value chain, to build capability in understanding how to address modern slavery risks and improve the lives of all workers in the supply chain. Initially, this includes providing detailed 'checklists' and guidance documents as to what should be in place at farm and grower level, with an aim to work with partners on the ground to support, monitor and drive further improvements.

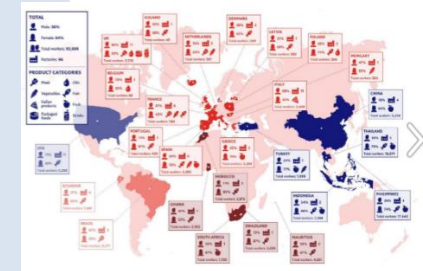
Case Study: Canned Fruit Supply Chain Visibility

16 Canned Fruit products



12 Raw Materials

(Apricot, Blackberry, Cherry, Mandarin, Mango, Peach, Pear, Pineapple, Prune, Raspberry, Rhubarb & Strawberry)



9 Source Countries

(Chile, Greece, Indonesia, Poland, Serbia, Thailand, Turkey, UK and USA)



30 Packhouses or Processors

5,829 Farms



11,233 Total Workers

Ensuring shoppers make the right purchasing decision

We have a long-standing, proactive approach on human rights issues in Italian agriculture, working for many years to tackle illegal labour and working hard to ensure that growers in our supply chain receive a fair and profitable price from us for their tomatoes.

In 2020 we launched a partnership with Provenance, a leading transparency programme, to develop on-pack quick response (QR) codes on our Napolina canned tomatoes products produced at our manufacturing site in Italy, Princes Industrie Alimentari SrL (PIA).

Through scanning in a QR Code shoppers are able to review our responsible sourcing credentials as part of a broader blockchain-related transparency drive. Shoppers are able to review information and enhanced details about the supply chain, including location and number of co-operatives, through a series of 'Proof Points' which Provenance's software verifies.

The results include:

- Increased trust amongst customers and consumers who have the ability to review and obtain the third-party validation and proof that our sourcing and impact claims are credible;
- A scalable solution for responsible sourcing communications across the Group as we consider other commodities to roll out on-pack traceability.

Transparency of sourcing is key for Italian tomatoes, primarily from a human rights point of view but also in providing reassurance of the provenance, highlighted by a number of reports over the past few years relating to adulteration of 'Italian tomatoes' using raw material from Asia or Africa.

Scan this QR Code to find out more:



Powered by PROVENANCE



Protecting workers' rights in our Italian tomato supply chain

As part of our ongoing commitment to protect workers' rights across the tomato supply chain we have announced a formal partnership with Oxfam Italy.

Through our collaboration we are rolling out monitoring processes and independent assessment of human rights initiatives implemented at PIA. Through these initiatives we are providing enhanced training to workers on labour rights, ethical practices and safety at work. We are also offering free health insurance to cover medical examinations and certificates and access to a 'help desk' service and safe transportation options for those workers employed in the fields, harvesting tomatoes.

These initiatives are designed to tackle exploitation challenges all too common within the Italian produce sector and represent further investment and support from Princes in fighting against exploitation practices, such as the Caporale (gangmaster) system.

The Caporale's control often has far-reaching and negative impacts on the lives of workers in the Italian tomato supply chain, through illegal wages, poor working conditions, lack of contracts and forced labour.

Watch our video on human rights risks, and the responsibility all stakeholders play in improving workers' rights, at: youtube.com/watch?v=TeQ-OYpY31E



OXFAM

"Oxfam has entered into this collaboration with Princes because there is a concrete opportunity to strengthen how local stakeholders work together as a means to improve conditions for thousands of workers who are vulnerable to exploitation"

Giorgia Ceccarelli, Oxfam Policy Advisor on Business and Human Rights

COLLABORATIVE ACTION TO ADDRESS ROOT CAUSE ISSUES

Modern slavery issues in global supply chains are often complex and challenging. Princes recognises the importance of collaborating with Non-Governmental Organisations, charities, trade union organisations, customers and our competitors to strive towards meaningful change and address some of the root cause issues of large and complex modern slavery risks. Working in this way enables us to maximise the resources we have available and ensures that guidance is delivered consistently through our shared supply chains.



We have been a Full member of the **Ethical Trading Initiative (ETI)** since 2018 and since 2019 Princes' Global Head of Sustainability has been a Board Director representing Corporate Members from the Food, Farming & Fisheries sector.

Our ETI Membership has facilitated on-going collaborative work with companies, trade unions and civil society organisations on challenging human rights issues. Throughout the year we have been involved in working groups relating to:

- Italian agriculture;
- Transitions and futures: applying a human rights due diligence approach to mitigating the impact of climate change on workers, business and supply chains;
- Assessing and improving gender equality in supply chains;
- Developing a Member Charter to drive accountability improvements for all members and ETI Secretariat.



Food Network for Ethical Trade (FNET) is a collaborative initiative which brings together major UK supermarkets and over 60 large food suppliers to improve human rights in global supply chains through a common approach to managing ethical trade. The initiative provides tools, support and guidance for suppliers to assess risk and take ownership for driving improvement.

We have used our membership to share and learn from peers particularly looking into lower tiers of our supply chain and beyond. Through our Board role we are also supporting members apply human rights due diligence approaches to climate change risks.



GRASP (GLOBALG.A.P. Risk Assessment on Social Practice) is a 3rd party assessment which defines the minimum requirements for a good social management system in primary production. The GRASP assessment is an Add-On to the GLOBALG.A.P. Integrated Farm Assurance Standard and helps farmers establish good social practices on their farms. Since 2018, we require all of our tomato growers in Italy that do not hold the SA8000 certification to have conducted a GLOBALG.A.P. GRASP assessment.

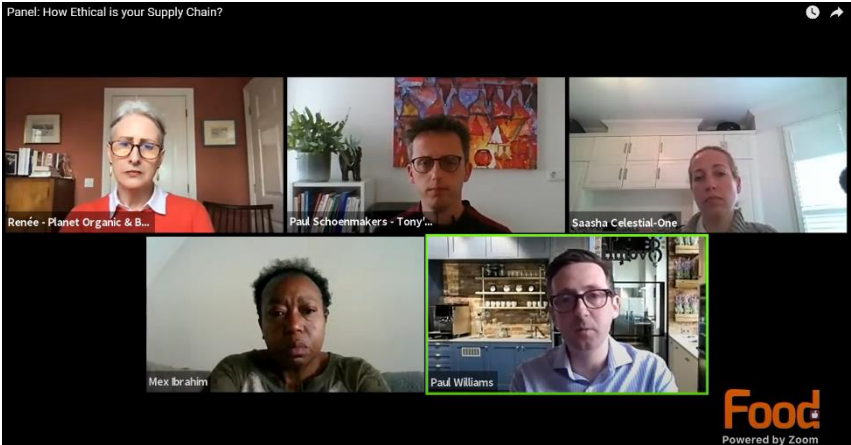


Seafood Ethics Action Alliance is a collaboration of UK seafood companies and stakeholders established to share information on emerging issues, agree best practice solutions and provide a forum for pre-competitive action.

SHARING BEST PRACTICES

Throughout the year we have continued to share best practice examples of the positive human rights work Princes and our partners have undertaken.

We know that we don't always have all the answers to global challenges relating to ethical trade, which can be difficult to identify and remedy, but by sharing examples of the journey we have been on in some of our supply chains, we hope to encourage others to learn from our mistakes and make lasting improvements for the benefit of all workers in their value chains.



- <https://www.newfoodmagazine.com/podcast/episode-27-ethical-supply-chains/>
- <https://www.newfoodmagazine.com/article/158504/the-new-era-of-transparency/>
- <https://www.itv.com/news/2021-09-23/whats-really-in-our-food-itv-tonight-investigation-uncovers-something-fishy>
- <https://www.raconteur.net/topic/sponsored/advancing-esg-strategies-through-supply-chains/>

CELEBRATING OUR PROGRESS

Princes views its responsibility to respect human rights across our supply chain as critical to our success and, put simply, the right thing to do.

We've made huge strides on our ability to assess, identify, mitigate and monitor actual and potential risks in our supply chains, and are pleased to continue supporting our supply partners to do the same.

We are delighted during the year to have received a number of awards for our human rights programme as a way of celebrating our progress and thank those stakeholders who continue to support us day in, day out.



In November Princes won a Co-op 'Treating People Fairly' award, recognising Princes' pioneering approach to supply chain transparency in tomato and tuna supply chains.

The independent panel of judges also commended us for our focus on responsible procurement and approach in connecting with consumers on sustainability themes.



Princes was recognised by Oxfam Italy for our ongoing efforts to tackle inequality and poverty in the Italian tomato supply chain, through a 'Fighting inequality: It can be done' award.

The award was received following the programme we launched in 2018 called 'Lavoro Senza Frontiere' (Work Without Borders) which works in collaboration with on-the-ground charity, Caritas, to train and find roles for survivors of modern slavery in Southern Italy. During the year we also received an award from the United Nations Human Rights Council in recognition of this initiative.

OUR PLANS FOR THE FUTURE

Princes views its responsibility to respect human rights across our supply chain as critical to our success and, put simply, the right thing to do.

Whilst modern slavery is an evolving topic, we will continue to develop our approach and report on our progress.

In the year ahead we will focus on the following priority areas:

- Launching a pioneering human rights impact assessment of beans and pulse sourcing to better understand some of the risks and opportunities available within this sector;
- Enhance our gender monitoring and worker representation monitoring across our sites and direct supply chain;
- Continuing to embed climate change risks and reporting through a human rights lens given the high degree of interconnectivity of both challenges;
- Committing our support for the Bright Future programme to provide work placements for victims of modern slavery where opportunities arise in our sites;
- Enhancing our requirements for higher risk suppliers of Indirects (goods and services not for resale);
- Continuing to enhance our Group-wide position on the Employer Pays Principle, working towards greater identification of and elimination of recruitment fees in supply chains;
- Ensuring that we retain CIPS Ethics mark certified;
- Increasing the volume of information publicly available about our supply chains.



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