



# Modern Slavery Statement

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**Jan – Dec 2023**



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This statement describes the steps Vitacress is taking to assess modern slavery risks in our business and supply chain, to drive action, and provide solutions.

As we set ourselves goals on an annual basis, we include an update on progress made throughout the year.

We are proud to be a Stronger Together Business Partner and publicly demonstrate our commitment to tackling hidden labour exploitation.

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# Foreword

## A commitment from our CEO

We pride ourselves on being a trusted and ethically responsible business and with over 50 million people trapped in forced labour and human trafficking globally, we are fully committed to tackling modern slavery and hidden labour exploitation.



With many experiencing financial challenges within our communities, there is an increasing risk to those most vulnerable, so it is critical that we identify and address any risks within our business to protect people, wherever they are in our business or supply chains.

## Our purpose at Vitacress is to be the Trusted Partner

Everything we do is underpinned by our values which includes 'Do the right thing'. From the way we grow our products to the way we take care of our people and those we work with. At the centre of everything is a trust that's been built for years demonstrating behaviours that inspire us to lead with compassion.

Vitacress will ensure compliance to the Modern Slavery Act 2015 to make sure the business and supply chains are slavery free. We do not tolerate any form of human rights abuse within our Group of companies or supply chains and will continue to follow our rigorous risk management processes. Achieving Stronger Together Business Partner status further proves our dedication to implementing good practice in this important area.

*Chris*

Chris Jinks  
**CEO, Vitacress**

# Progress in 2023

The business continued its focus on Modern Slavery and Human Rights due diligence through a challenging year for food manufacturing and significant change within the business. The initiatives progressing throughout the year were as follows:

- We continued our engagement with SEDEX across HR, Technical and Procurement teams to fully utilise the tools and new developments within the risk assessment platform.
- Continuation of our status as a Stronger Together Business Partner showing an improvement in business achievement scores year on year.
- Use of Stronger Together resources to support our new online induction, also available to self-serve from a dedicated Modern Slavery section on our intranet site.
- Focus across UK sites on SEDEX risk assessment with action plans to help suppliers reduce risk status from high to medium or low categories. Both Vitacress UK manufacturing sites completed significant work in identifying key raw material suppliers to work with to improve risk rating and gain better understanding of SEDEX self-assessment.
- Introduction of an in-house Talent Acquisition function affording Vitacress the capability and capacity to increase focus on responsible recruitment including in-depth review of hiring standards, processes, recruitment agency partners and labour providers.
- Improved auditing of labour providers, with a focus on accommodation standards where provided, and worker welfare interviews.
- A network of expert advisors, industry contacts and local support continue to enable the business in dealing with any issues arising in relation to Modern Slavery.
- Modern Slavery risks or incidents are reported and discussed at regular meetings across the business to create awareness throughout all departments.

# 1. Our organisational structure

Vitacress is a European-wide business that has a variety of farming and manufacturing sites across several countries. In the UK, Vitacress has two manufacturing sites, supported by two leaf and eight watercress farms. Outside the UK, Vitacress has manufacturing sites in Portugal and the Netherlands, two farming areas in Portugal and one farm in Spain.

## Business Supply Chains

Vitacress is committed to the highest standards of ethical conduct and social and environmental responsibility. Vitacress requires suppliers to operate in accordance with the principles of its Supplier Code of Conduct and in full compliance with all applicable laws, regulations and codes within their countries of operation. Our Supplier Code of Conduct (SCC) highlights the minimum requirements expected of a supplier to Vitacress and as such may be augmented by the law and by higher standards of expectations as set out in any contract between a supplier and Vitacress. During 2023, Vitacress reached the goal for the top 500 suppliers signing and agreeing to our SCC (or their own version of the same) and started the process of renewal for those requiring it. All new suppliers contracted through 2023 signed and agreed as appropriate.

Vitacress' Purchasing Policies also provide clear guidelines, committing every individual involved in purchasing and supply management processes to use their best endeavours to ensure that our purchasing and contracting activities are aligned with our Modern Slavery and Human Trafficking Statement.

Our purchasing policies and code of conduct have been reviewed during 2023 and remain relevant and appropriate to our operations.

## Geographic sources

Vitacress sources both raw material and non-raw materials from suppliers around the world directly and indirectly.

Suppliers we have a trading relationship with (first tier–direct source) are located in the following countries:

Belgium, China, Cyprus, Czech Republic, Denmark, Estonia, Ethiopia, France, Germany, Greece, Hungary, India, Ireland, Israel, Italy, Jordan, Kenya, Lithuania, Monaco, Morocco, Netherlands, Norway, Peru, Poland, Portugal, Senegal, Slovakia, South Africa, Spain, Sweden, United Arab Emirates, and United Kingdom. and United States of America.

In addition, our suppliers also source (second tier) from the following countries:

Argentina, Bulgaria, Chile, Finland, Israel, Japan, Malaysia, Moldova, Pakistan, Romania, Taiwan, Tunisia, Turkey, Slovenia and Sri Lanka.



# 2. Our policies in relation to Modern Slavery - UK

Our policies and codes of practice support Vitacress' opposition to all forms of human rights abuse and take account of local, national and international laws and regulation.

## UK

All policies and codes of practice were reviewed by our legal advisors during 2023 and changes made where relevant to maintain compliance and best practice.

Vitacress continued investment in its Human Resources Information System (HRIS) and company intranet (Greenhouse) to ensure easy access for all colleagues to company policies and procedures, and full integration of these in the company's new on-line onboarding process.

### Policies

- Modern Slavery
- Preventing Hidden Labour Exploitation/Stronger Together
- Agency Labour Provider
- Human Rights - Equal Opportunities and Dignity at Work
- Young Person and Child Worker
- Grievance
- Whistleblowing
- Recruitment
- Anti-Bribery
- Group Purchasing Policy

### Codes of Practice

- Employee Code of Conduct
- Supplier Code of Conduct

# 2. Our policies in relation to Modern Slavery - Europe

## **Vitacress Portugal and Vitacress Real (The Netherlands)**

As part of induction, each employee receives the following policies:

- Employee Code of Conduct
- Whistleblowing
- Recruitment
- Grievance
- Anti-Bribery
- Equal Opportunities

In addition, Vitacress Real manages labour provision through the ABU (General Federation Temporary Employment Agencies), which ensures affiliates comply with the law and are subject to annual audits. As required by Dutch law, whistleblowing and grievance procedures are supported by independent counsellors. Vitacress Real has appointed two counsellors as described in the colleague handbook.

## **Vitacress Espana (Spain)**

Our policies and codes of practice in Spain have been translated from the UK versions and adjusted to take account of local law. We work with local independent labour law experts to ensure compliance.

# 3. Due diligence

## Vitacress SMETA Audit Status (Manufacturing)

All Vitacress sites are registered on the Supplier Ethical Data Exchange platform (SEDEX), and the manufacturing sites have SMETA audits.

## Supplier Due Diligence

The main tool used for ethical risk assessment for UK operations supply is SEDEX. All raw material, ingredients and labour providers are registered on the SEDEX platform together with all UK based packaging suppliers. As such, there is a requirement to complete a self-assessment questionnaire and initiate a trading relationship on the platform with the relevant Vitacress business.

The business units hold a monthly review of registered suppliers using the SEDEX risk assessment tool (RADAR) which highlights the risk category for each registered supplier. Where appropriate, a SMETA audit is required for raw material suppliers classed as high risk or those growing raw material in a country with inherent risk factors. Further spot checks and due diligence is carried out monthly to assess suppliers classed as high or medium risk, and support given to help reduce this risk and to identify areas where action needs to be taken.'

Where suppliers have SMETA audits that require non-conformances closing out, further support and help is provided by Vitacress technical teams when necessary.

Our operations in Europe use several tools to aid ethical assessment, subject to customer requirements, local laws and Vitacress practices. These include SEDEX, GLOBALG.A.P Risk Assessment on Social Practice (GRASP) and the Vitacress Supplier Code of Conduct.

Annual assessments for raw material, ingredient or packaging suppliers have continued. The technical warranty packs have been reviewed and updated for raw material and ingredient suppliers and, together with the Supplier Code of Conduct and SEDEX registration, are issued and agreed annually.

Vitacress utilised the UK Government Seasonal Agricultural Workers Scheme for our farms in 2023, sourcing workers via an approved provider.

## Audits

All stages of Vitacress operations, supply chain and labour provision can be subject to programmed or unannounced audit to ensure compliance to Vitacress' expected standards. Audits went ahead as scheduled during 2023.

Vitacress Real labour provider has been audited as required by local law.



# 4. Assessing and managing risk

Vitacress continues to operate within the framework of our policies and codes of practice, enabling the business to carry out risk assessment and due diligence as necessary.

Risk assessment within UK operations is supported by AB (supplier/buyer) membership of SEDEX and, where necessary, SMETA auditing.

Raw material sourcing can include products from countries classed as high risk in terms of potential human rights abuses. To support risk assessment and due diligence, all programmed raw material suppliers must be registered on SEDEX. Where higher risk factors are indicated, a SMETA audit is required, and any non-conformances identified must be closed out in the appropriate timescales. Results of SMETA audits are reviewed by the relevant site team and any further action deemed necessary is taken. This may involve site visits, support with documentation and policies or verification via a follow-up audit.

The raw material supply base risk management within European operations is supported by the Supplier Code of Conduct. Further assessment is accessed via SEDEX or GRASP audits, with the latter requiring an annual audit. Raw material supplier visits are scheduled as necessary.

Use of other information sources such as Stronger Together, Association of Labour Providers (ALP) newsletter and customer communications all support a wider network of industry intelligence to identify risk in business supply chains.

The Group Technical Director attended the Modern Slavery Intelligence Network working groups, focussing on the risks within the food industry and the sharing of best practice and ideas.

# 5. Measuring performance

## Key Performance Indicators (KPIs)

- Vitacress continued as a Stronger Together Business partner throughout 2023. Year-on year improvement has been evidenced for the fourth year running.
- Key performance indicators are reviewed at senior leadership team level, both centrally and at site level. Any non-conformances identified as the result of audit, either at Vitacress sites or first tier supplier sites, are dealt with via the appropriate teams. Support is given to suppliers where necessary to resolve any issues raised.
- The UK business units review SEDEX registration and risk assessment results, with a focus on the higher risk rated suppliers. Further focus during 2023 has been on SMETA non-conformance trends both for Vitacress' own sites and raw material supply.
- Whistleblowing incidents and other activities that may indicate Modern Slavery factors are discussed at the appropriate business forum.
- Results from the colleague engagement survey have been reviewed and remedial action taken where necessary. Modern Slavery awareness was covered fully within the survey.
- Learnings have been taken from any incidents local to the sites, helping to build a network for information gathering and support for the future.

# 6. Raising awareness and education

## Education and Support

Vitacress has a robust onboarding, induction and training programme to ensure every colleague is made aware of the risks of Modern Slavery from the moment they start working with the company. Courses focused on Modern Slavery are run in person and via webinars.

Vitacress UK also makes available an employee assistance programme – WeCare (through Canada Life), whereby anyone can email or phone the free 24-hour confidential help line for support and advice. The phone numbers are displayed on all company notice boards and the company intranet (UK). Vitacress Portugal offers similar support through internal programmes and association with external organisations such as CLAIM support centre in Odemira (Centro Local de Apoio à Integração de Migrantes); a support centre for the integration and support of migrants).

## Meetings

The Vitacress Senior Leadership Team meets monthly and discusses Modern Slavery KPIs as part of the Company governance agenda across all business areas. This is supported by a Group monthly meeting specifically discussing Modern Slavery and any associated risks.

Each business unit reviews Modern Slavery measures and KPIs with the senior management team on a monthly basis.

Modern Slavery is an agenda item on the bi-monthly Business Involvement Groups (BIG), which have cross business worker representation (UK).

## Communication

Stronger Together, ETI Base Code and whistleblowing information is displayed on notice boards across the sites.

External communications are received weekly from the Food Network for Ethical Trade (FNET), giving details of hot spots or activities within the week relating to Modern Slavery.

As members of the Association of Labour Providers (ALP), we received a monthly update, and had access to resources to support both communication and training.

# Looking forward

## Areas of Focus for 2024

- Use SEDEX risk assessment scores to support suppliers in reduction of their risks.
- Conduct in-depth labour agency audits, focusing on areas of risk such as accommodation.
- Reset learning needs analysis and L&D planning cycle including relaunch of on-line training content that integrates company policies to heighten awareness, education and capability in using Vitacress modern slavery management framework.
- Create and deliver in-house modern slavery workshop to critical roles.
- Extend Stronger Together training to broader target audience to drive even greater awareness, capacity and capability across the business.
- Leverage Vitacress membership of the Food Network for Ethical Trade (FNET) including active participation in relevant working groups.
- Work towards Stronger Together Advanced Business Partner status.
- Work towards Responsible Recruitment Business Partner status.

# Our commitment

We will continue to keep the threat of modern slavery and hidden labour exploitation at the forefront of our decision making, and ensure that policies, processes and engagement focus on improving our efforts in tackling risk in our business and supply chains.

This statement has been approved by the Vitacress Senior Leadership Team for the financial year ending 31 December 2023.



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CEO



Sarah Sturton  
Group HR Director



Innogen Carter-Hall  
Group Technical  
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Ashley Cooper  
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