



Modern Slavery and Human Trafficking Statement 2022/23

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015, extending to England and Wales. This statement aims to demonstrate the steps Keeling's International Limited (company number 01628818) has undertaken to prevent modern slavery and human trafficking taking place within the business and supply chain for the company's financial year ending 23rd November 2023.

Modern slavery encompasses slavery, servitude and forced or compulsory labour. Human trafficking is the arranging or facilitating travel of another person with a view to that person being exploited.

Structure and Supply Chains

Keeling's International Ltd is the UK-based part of the Keeling's Group, a family-owned company based in County Dublin, Ireland. Keeling's International includes an office and fresh produce packing facility in Finedon, Northamptonshire with further offices in Essex and Cambridgeshire. The company employs around 145 permanent workers with a peak of up to 60 agency workers.

The company's main corporate activities include the sourcing, packing and supply of fresh and prepared fruits, vegetables, and salads to retail and wholesale markets in the UK. During the 2022/23 financial year, Keeling's International sourced fresh produce from over a hundred suppliers and grower groups. It is estimated that more than two thousand farmers and growers across twenty countries supplied goods into the Keeling's International supply chain during the year.

Policies on Modern Slavery

Keeling's Company Values are set as **People Matter, Integrity, Teamwork and Passion for Achievement**. These four pillars are central to all business activities. As such, Keeling's International has a range of policies designed to ensure the fair treatment of workers. These policies are made available and accessible from day 1 on our Keeling's internal intranet and on request from the People Team to all employees.

These include the following:

- *Ethical Trading*
- *Prevention of Hidden Labour Exploitation*
- *Human Rights*
- *Anti-bullying and harassment*
- *Equal Opportunities*
- *Ethical Responsibility for Suppliers*
- *Anti-Bribery and Fraud*
- *Recruitment Policy*

The following policies support employees and agency workers with grievance mechanisms for raising concerns:

- *Grievance Policy*
- *Whistleblowing Policy*

The company is committed to ensuring welfare of employees with wellbeing and inclusion committee, wellbeing service providers and employees assistance programs.

We also run an employee voice forum which allows representatives across the business to be able to voice concerns and play an active role in the welfare of their employees.

Site Due Diligence Processes

Recruitment practices ensure all employees are legitimate and have the right to work. We ensure no recruitment fees are accepted, original documents are not held by the company or any third party and payments to directly employed personnel are by bank transfer to their own accounts.

Posters are displayed around Keeling's sites to remind employees and agency workers of the ETI Base Code and detailing whistleblower numbers to use in cases of suspected modern slavery.

Labour providers used are registered with the Gangmasters and Labour Abuse Authority (GLAA) and the company coordinates an external agency labour provider audit and regular due diligence meetings. The agency audits review hours worked, payslips, wellbeing, and interviews. The GLAA Active Check system is used to monitor the labour provider's compliance with GLAA rules. Packing operations at Finedon undergo a bi-annual third-party SEDEX Members Ethical Trade Audit (SMETA) against the ETI Base Code. The latest audit, completed in 2022, has no outstanding non-conformances.

Keeling's International engages with Stronger Together, a multi-stakeholder initiative aiming to reduce modern slavery by providing guidance, resources, training and a network to employers, labour providers, workers, and their representatives.

Keeling's International is a sponsor of the Spanish Ethical Trade Forum for Suppliers, a collaborative initiative in the Spanish fresh food sector, encompassing suppliers, retailers, and NGOs to address commonly perceived labour issues such as managing migrant labour, sexual harassment, and modern slavery in a key sourcing region.

In 2019, Keeling's International joined the Food Network for Ethical Trade (FNET) a multi-stakeholder organization sharing best practice and working collaboratively to make changes in supply chains. Involvement is within working groups looking at ethical engagement and risk assessment and mitigation.

Keeling's International is a member of the Fresh Produce Consortium which, together with SEDEX membership, interaction with consultants, peers, industry press and the GLAA, provide a level of horizon scanning for issues occurring in the fresh produce industry.

Suppliers Due Diligence Processes

We use the secured portal for our suppliers to complete the supplier questioner and to submit the due diligence documentation. Suppliers are required to sign a copy of our Ethical Responsibility for suppliers' policy, available on the portal. This requires suppliers follow the ETI Base Code and become members of Sedex (Supplier Ethical Data Exchange) unless based in the Republic of South Africa where SIZA (Sustainability Initiative of South Africa) may be accepted. As members of Sedex, suppliers are

required to link and share information with Keeling's International including responses to a self-assessment questionnaire based upon the ETi Base Code, which should be updated twice annually. Based on the risk assessment and customer requirements, suppliers' sites may be required to have second or third-party ethical audits. As an AB member of Sedex, Keeling's International is granted visibility of suppliers' self-assessments and third-party ethical audits, complete its own self-assessment and share information with retail and food service customers. Additional background checks on new suppliers are carried out, including web searches for records of current and historic malpractice in matters relating to human rights.

Suppliers are risk assessed using the Sedex Risk Assessment Tool monthly and through use of further risk assessment tools taking into account their global region, known historical issues and length and size of the supply to the business. Based on the results of the risk assessment, suppliers may be asked to undertake SMETA audits, receive second-party social audits, provide evidence of compliance to social standards, or mitigate for any risks identified.

Measuring Effectiveness

During the 2022/23 year, no known incidents of modern slavery were confirmed within the business or its supply chain. There were no incidents of clandestine travelers found in vehicles supplying the Finedon site with produce from the continent.

Keeling's International are participating in the Stronger Together Progress Reporting Tool. This is an online self-assessment tool designed to help businesses highlight progress made and identify next steps in addressing modern slavery risks. It also allows businesses to benchmark against their peers.

Training of employees and agency workers

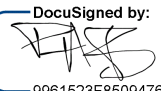
All permanent and agency workers are made aware of the risks of modern slavery during their induction training.

Within the senior management team, one person is a trained social systems auditor. A further three members of the senior team have received external training in tackling modern slavery through Stronger Together.

In 2023, directors, buyers, technical managers, people team and operational management received Introduction to Ethical Trading Training provided by Source Sustainable Supply Chains Limited.

Members of the management team regularly attend local and national forums run by retailers and third parties to share good practice and learn from the practical experiences of peers in managing modern slavery and trafficking in their supply chains.

The above is an accurate account of the activities undertaken by Keelings International Limited to combat modern slavery in the 2022-23 year.

DocuSigned by:

9961523F8509476...

Philip Brown, Business Unit Director

22nd December 2023