



### UK Modern Slavery and Human Trafficking Statement 2023/24

This modern slavery statement has been created pursuant to Section 54(1) of the Modern Slavery Act 2015. It demonstrates the steps Keelings International Limited (company number 01628818) has taken to mitigate risks of modern slavery and labour exploitation within our own business and our supply chain. This statement covers the company’s financial year ending 28<sup>th</sup> November 2024.

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.

#### About Keelings

Keelings is a 100% Irish owned, third generation family business operating and innovating within the fresh produce industry since 1926. Keelings International Ltd is the UK-based part of 11 business units across the world that make up the Keelings Group.

Keeling’s International encompasses an office and fresh produce packing facility in Finedon, Northamptonshire. The company employs around 145 permanent workers of 16 different nationalities, 51% of which are female and 49% male, with a peak of up to 43 agency workers.

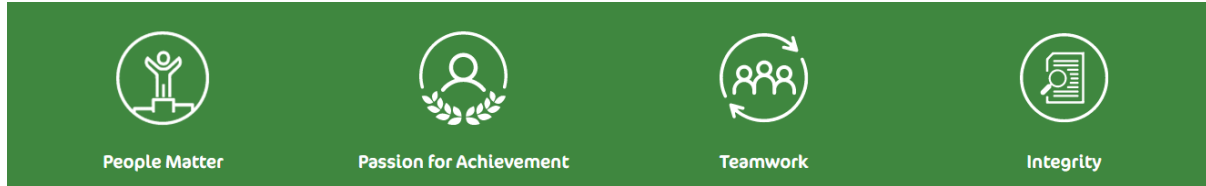
The company’s main corporate activities include the sourcing, packing and supply of fresh and prepared fruits, vegetables, and salads to retail and wholesale markets in the UK.

Keelings vision is to inspire more people to enjoy fresh produce, and our mission is to sustainably grow, source and market quality produce, by investing in our people, ways of working, insights and partnerships.



The Keelings Company Values are set as People Matter, Integrity, Teamwork and Passion for Achievement. These four Company Values are central to all business activities and everyone within the business is encouraged to live these values, in everything they do.

These Company Values have been expanded and brought to life with a company capability framework which drives positive behaviour and leadership.



### Supply chain

During the year relevant to this statement, Keeling's International sourced fresh produce from over a hundred programmed suppliers, across 26 countries.

### Policies

Keelings International has a range of internal policies designed to ensure our workers are treated fairly with their human rights respected. In case circumstances arise where workers feel they have not been treated in this way, all workers have access to a number of channels for reporting such concerns, with the reassurance that issues will be dealt with in a fair, consistent and timely manner.

We have an internal Labour and Human Rights Working Group who is working on continuous improvement, including the review of our relevant policies.

The below list describes some of our internal policies:

- **Prevention of Hidden Labour Exploitation Policy** committing the company to take a proactive approach to tackling hidden labour exploitation.
- **Human Rights Policy** demonstrating the company's commitment to all internationally recognised human rights and commitment to the Ethical Trading Initiative (ETI) Base Code.
- **Anti-Harassment and Bullying Policy** committing to provide a safe working environment for all colleagues, free from any form of bullying or harassment.
- **Equal Opportunities Policy** ensuring all colleagues and applicants for employment have equality of opportunity.
- **Anti-Bribery and Fraud Policy** setting out the rules of Keelings employees to ensure no bribery or fraud occurs.

- **Recruitment Policy** to ensure a fair, equitable, transparent and inclusive practices are followed in all recruitment and selection processes.
- **Diversity and Inclusion Policy** to ensure all colleagues are treated equally and that no colleague is subjected to any form of discrimination.
- **Grievance Policy** which establishes a clear procedure to ensure grievances are dealt with in a fair and consistent manner and are resolved as quickly as possible.
- **Whistleblowing Policy** which encourages and enables workers to voice concerns regarding malpractice or wrongdoing within the company in a responsible and effective manner and without fear of penalisation or threat of less favourable treatment.

We have a range of communication and engagement channels available for workers to report concerns, issues, suggestions or ideas. These include colleague voice forums, townhalls, suggestions boxes, confidential phone line, confidential online reporting form and access to the People Team. We also provide an anonymous annual colleague survey, giving the option for workers to report issues anonymously should they feel this to be most appropriate and to give feedback on how to improve their working conditions and environment.

If a worker has worries that they do not want to disclose in the workplace, we also provide a range of wellbeing initiatives - workers can access Grocery Aid for free Financial, Practical or Emotional support, as well as advertising external phone lines such as the Modern Slavery Helpline and any customer whistleblowing phone lines.

Externally, we require our suppliers to commit to our **Ethical Responsibility Policy for Suppliers** outlining the minimum standards expected of our suppliers, including adherence to the Ethical Trading Initiative (ETI) Base Code and all relevant national and other applicable laws, as well as becoming members of Sedex (Supplier Ethical Data Exchange) unless based in the Republic of South Africa where SIZA (Sustainability Initiative of South Africa) is accepted. It is a requirement that suppliers sign this document to agree the terms.

## Due Diligence and Risk Management

### Our Site

Internally, we have a number of processes to ensure the safety and welfare of the people working in our facility, starting at recruitment and continuing throughout their employment or assignment.

On recruitment, we ensure all employees have the legal right to work in our business and we ensure that all employees are paid directly into their own bank accounts. During the recruitment process, we ask employees if they have paid any recruitment fees and

advise them that this is illegal in UK and that they should report if they have. We also advise new starters of our whistleblowing channels; in case they need to report something at a later date.

We cover modern slavery in our induction training, this not only informs our workers that they should not experience this but also helps to raise awareness for spotting the signs, so that our workers can look out for one another. Posters are also displayed around Keelings sites to remind both employees and agency workers of the ETI Base Code detailing whistleblower numbers to use in cases of suspected modern slavery.

During the year relevant to this statement, we have used one trusted labour provider who is registered with the Gangmasters and Labour Abuse Authority (GLAA) and we use the GLAA Active Check system to ensure we will be notified of any changes to the labour provider's license. We also commissioned a third-party consultant to complete an extensive audit of our labour provider to ensure all expected standards are upheld. We also have regular due diligence meetings directly with them.

Keelings International is an AB member of Sedex. We complete a self-assessment questionnaire that is shared with our customers and undertake an ethical audit every two years which assesses the effectiveness of our internal management systems.

### Our Suppliers

We require all suppliers to be members of Sedex and to be linked to, and share information with, Keelings International including responses to their self-assessment questionnaire and audit outcomes. 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.

Our suppliers are risk assessed using a combination of desktop risk assessments, direct supplier engagement including in-person visits, ethical audits and the monitoring of news outlets. In 2024, we improved our human rights risk assessment, as well as introducing a sustainability risk assessment. Based on risk assessment and customer requirements, supplier sites may be required to have a second or third-party ethical audit, provide evidence of compliance to social standards or mitigate any risks identified.

### Collaboration and networks

#### The Food Network for Ethical Trade (FNET)

FNET uses the collective leverage of suppliers and retailers to bring about positive change in working conditions in global food, beverage and horticulture supply chains. Keelings are active members of FNET and have been involved in a number of working

groups, including Empowering Work, Climate Change and Human Rights, Raw Materials and Services, and Common Due Diligence.

#### The Spanish Ethical Trade Forum (SETF)

The SETF was set up in 2015 in response to a recognised need to promote better working conditions within the Spanish agri-food sector. Keelings are very active in this forum and have led one of the working groups in overseeing the creation of an independent, centralised grievance mechanism which is now actively being used by workers in the Spanish agriculture industry. In 2024, Keelings attended a number of forum meetings, with 4 representatives at the SETF International Event.

#### The Fresh Produce Consortium (FPC)

The Fresh Produce Consortium (FPC) is the UK's fresh produce trade association advising and influencing current industry affairs. By being FPC members, we have access to resources such as their guidance document on UK temporary accommodation.

#### The Association of Labour Providers (ALP)

Established in 2004, the ALP promotes responsible recruitment and good practice for organisations supplying workers to across primary and industrial sectors. Keelings International, as well as many of our suppliers, use agency workers and therefore we became Associate Members of the ALP in 2024 to have access to the ALP resources as a labour user.

#### Grocery Aid

Grocery Aid is an industry charity providing support to people who have worked, or are working, in the grocery industry.

Keelings International joined Grocery Aid in 2024 giving all our workers and their families access to free financial, emotional and practical support.

### Our Effectiveness

In March 2024, our Keelings International site had their biennial SMETA audit, receiving no non-conformances, an improvement on our previous audit.

During the year we put our modern slavery training into action when we received a report from a worker around concern for a colleague. This was investigated and was not an issue of modern slavery or exploitation, however, we supported the colleague with resolution and praised the worker who reported the concern and provided support for their colleague.

During this period, we also identified a specific risk within our supply chain around UK accommodation standards, particularly accommodation provided to workers on the UK Seasonal Workers Scheme. Following this risk identification, we completed audits on

our UK suppliers that use the UK Seasonal Worker Scheme and provide accommodation, ensuring expected standards are upheld.

We strive for continuous improvement and will continue to raise modern slavery awareness within our business and to look for risks in our supply chains.

### Training and Building Capacity

All new starters to the Keelings International business, including all agency workers, complete a full site induction including people, health and safety, food safety, dignity and respect in the workplace and modern slavery. This induction includes what worker exploitation is, how to spot the signs and the mechanisms available to raise any concerns.

This year, managers received specific third-party training on Equality, Diversity and Inclusion which also covered in depth training on harassment, including sexual harassment.

A number of employees in the business have completed in-depth training by Stronger Together, including their “Tackling Modern Slavery in UK Businesses” course. All Operative Team Leaders have completed the Stronger Together “Tackling Modern Slavery in the UK” e-learning and the Operations Management Team have completed the “Tackling Modern Slavery in Business” e-learning.

For continuous reminders, we have noticeboards around site to remind people of their rights and how to raise any concerns, including external helplines such as the Modern Slavery Helpline and the Gangmasters and Labour Abuse Authority helpline.

On Anti-Slavery Day on 18<sup>th</sup> October 2024, the site took the opportunity to raise further awareness of modern slavery by giving a presentation to workers on a) what modern slavery is, b) the signs to look out for, and c) what to do if a worker suspects something.

**The above is an accurate account of the activities undertaken by Keelings International Limited to combat modern slavery in the 2023-24 year.**

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**Charlie Heather, Managing Director**

**11<sup>th</sup> February 2025**