



**Iberveg UK Ltd**  
**Modern Slavery Statement**  
**Financial Year 2024**



**INTRODUCTION**

Iberveg UK Ltd (Iberveg) is committed to preventing modern slavery and human trafficking in all aspects of our business and supply chains. This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and outlines the steps we have taken during the financial year ending 30 September 2024 to ensure that slavery, forced labour, and human trafficking are not present in our operations or those of our suppliers.

We recognise our responsibility to uphold ethical business practices and are dedicated to continually improving our policies and procedures to combat modern slavery.

This statement applies to Iberveg UK Ltd and its subsidiaries.

Signed

Commented [EL1]: Please add your signature

Richard Vater  
Managing Director, Iberveg UK Ltd.  
22/05/2025

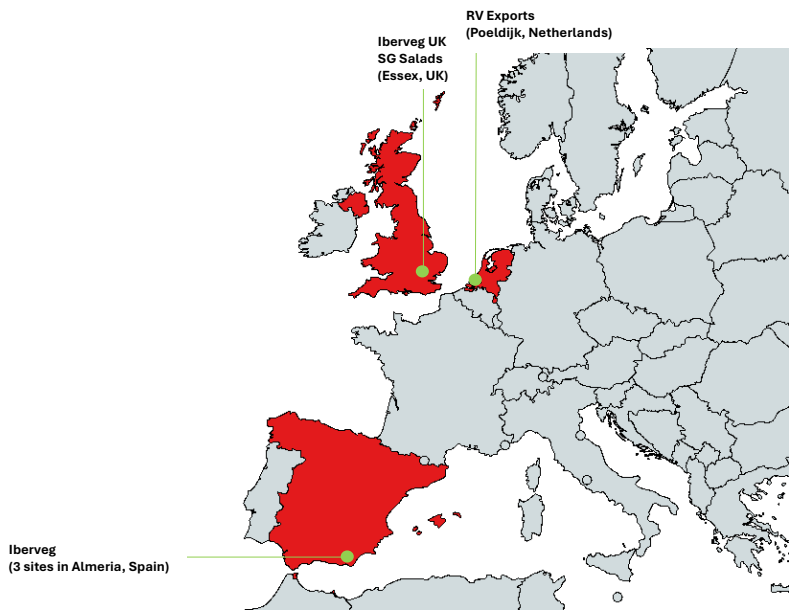
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**OUR STRUCTURE, BUSINESS AND SUPPLY CHAIN**

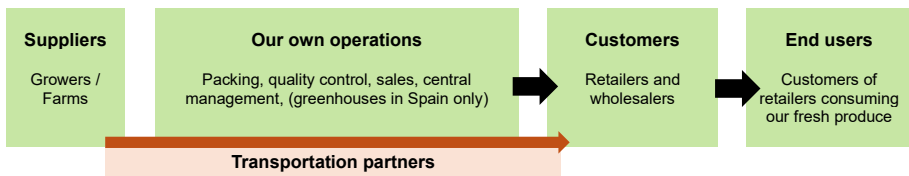
Iberveg is a fresh produce company supplying fresh produce from Spain, Netherlands and the UK to wholesale markets and UK retailers. We are also growers in Spain and the UK. Globally Iberveg employees 130 people across Europe, with 4 employees in Iberveg UK and 65 employees in SG Salads in our UK operating site. The map below details the locations of our own permanent sites whilst the countries highlighted in red show where we source fresh produce.



Our fresh produce includes cucumbers, tomatoes, peppers and aubergines. Tomatoes are only sourced from Spain.

During 2024 we worked with and sourced fresh produce from 16 growers across the UK, Spain and Netherlands. These numbers change each season depending on customer demand and grower relationships. We have a direct relationship with our growers and source directly from the farms.

Our value chain is as follows:



## **GOVERNANCE AND POLICIES**

### **Governance**

The managing director of Ibervego is primarily responsible for modern slavery and human rights. In the UK the Technical Manager is assigned responsibility for leading on due diligence and works closely with commercial colleagues to work with growers on communicating expectations.

In Spain a cross-functional team is responsible for managing human rights matters, including modern slavery. This team secures support from key company functions, facilitates integration of human rights considerations, provides diverse perspectives for developing mitigation actions, and offers practical insights into feasibility and implementation our Human Rights Procedure. The Human Resources Manager working with the leadership team identifies potential human rights risks within the organisation and implement preventive actions to mitigate or eliminate negative impacts. The Administration Manager assesses risks affecting workers' rights and approves mitigation measures, this is detailed and made available to employees in our Human Rights Procedure.

### **Policies**

We have several policies in place that are relevant to modern slavery and human rights. We will continually review and develop our policies as we gather more insight into our risks and the input from external experts and customers, these include:

- Social Responsibility Policy which covers all eight ILO conventions, including freedom of association and collective bargaining, abolition of child labour, abolition of forced labour, elimination of discrimination.
- Policy for the Prevention and Treatment of the Risk of Forced Labour and Hidden Labour Exploitation explicitly addresses human trafficking.
- Human rights policy covers all essential human rights.
- Supplier code of conduct.
- Responsible Recruitment Policy
- Workplace Sexual Harassment Protocol
- Health and Security Policy
- Our employee handbook provides a variety of policies including grievance policy, equal pay, maternity, paternity and parental leave policy, anti-bribery policy and whistleblowing.

## **RISK ASSESSMENT AND DUE DILIGENCE PROCESSES**

Our due diligence approach to managing the risk of modern slavery forms part of our broader efforts to respect and promote human rights. We are in the process of developing our supply chain due diligence activities further to ensure they align with the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises and their guidance on human rights due diligence (HRDD).

We consider the risk of modern slavery in our directly employed workforce to be low. We source directly from growers, it is not a complex supply chain, and we consider the risk of modern slavery to be low. We recognise there is more we can do and will be making specific efforts in 2025 to improve on-farm grower due diligence during production months and specifically looking at accommodation of seasonal workers.

To identify and assess the risk of human rights and modern slavery, we have undertaken the following steps:

- Conducted an internal human rights risk assessment of our UK operations which covered workplace assessments focused on materials used, handling processes, and working conditions. Safety evaluations include reviewing accident and incident records, with tripping hazards identified as the most common risk.

## Modern Slavery Statement 2024



- In 2024 we had a SEDEX SMETA audit of our UK site. Following this we completed a corrective action plan.
- We ask all our growers in Spain to complete a Self-assessment questionnaire.
- All our suppliers in Spain and Holland have the Global GAP GRASP certification which assesses farms on social risk factors, fair working conditions and labour rights compliance.

During 2025 we plan to develop a new due diligence approach for assessing growers which is appropriate to their size and context.

### TRAINING AND AWARENESS

Building our capacity to understand human rights and modern slavery challenges is key to managing, preventing, mitigating and remediating risks and impacts.

Policies and documents are available at sites, many of our workers do not have access to laptops to complete their work so we print out policies and have them available to read in the break rooms at sites.

Members of our management team with responsibility for modern slavery, human rights and worker welfare have completed training on social audits, social management systems procedures and identifying and responding to modern slavery. Some employees have also attended training delivered by Stronger Together. During 2025 we will reassess further training needs and our Spanish colleagues will be completing training delivered by Foros Comercio Etico, (Ethical Trade Forums on modern slavery).

### MEASURING EFFECTIVENESS

Working across our technical teams in Spain and the UK we continuously work to understand the effectiveness of our processes. During our next financial year we are instructing an independent consultant to undertake a human rights gap assessment, against the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises to assess the effectiveness of our existing programme. This will result in the development of our human rights action plan for 2025 and beyond.

### PARTNERSHIPS

In 2024 we became a member of the Foros Comercio Etico, Ethical Trade Forums in Spain. They are a collaborative initiative established in 2015 to promote better working conditions within Spain's agri-food sector. They bring together various stakeholders, including retailers, importers, exporters, suppliers, producers, and external organizations, aiming to improve labour conditions and ensure the social, economic, and environmental sustainability of the sector.

### NEXT STEPS FOR FY25

During 2025 we plan to:

- Undertake a human rights gap assessment
- Improve grower due diligence
- Review policies and training