**Modern Slavery Statement 2023**
This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31/12/2022 The Policy covers all entities in which Haygrove Summit Supervisory ("Haygrove") has a majority shareholding.

**Introduction**
Haygrove is committed to establishing action plans to assist in the prevention of slavery and human trafficking from our own business, as well as seeking to ensure that our supply chains are also free from such practices.

Haygrove is committed to respecting human rights ensuring we identify and assess the risks, mitigating those risks and where necessary taking appropriate remedial action where instances may be found within our own business and within our supply chain.

**Our organisational structure and operations**
Haygrove was founded in 1988 by the Chairman, Angus Davison, is a berry-farming business with enterprises in the UK, South Africa, China, and Portugal. The business also has Growing Systems enterprises in South Africa, China, Germany, USA, Mexico, India, and Poland, with sales staff in a further 15+ countries.

Haygrove takes pride in maximising opportunity for everyone involved within the business, whilst always living the company values.

The business defines success in human terms, constantly seeking to "create opportunities for great people, particularly those who have drawn the short straw", and measuring its' results across three bottom lines: People, Profit and Planet.

Haygrove employs just over 1,000 people globally and a further 3,000+ on fixed term or seasonal contracts, with an annual global turnover of £142.6m.

**Nature of our supply chains within growing systems**
Our supply chain involves the purchase of metals, manufactured componentry, polythene, from primarily within the UK, Europe, and Asia.

**Policies relating to slavery and human trafficking:**
- UK Anti-slavery and Human Rights Policies
- South Africa Human Rights Fair Labour Practices Policy

Reflect our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our

business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

Haygrove ensure that an ethical sourcing questionnaire is in place for key suppliers. This has been distributed and agreed with those key suppliers.

**Risk assessment**

Haygrove use the following processes and information to assess which of our own activities and those within the supply chain represent the highest risks in respect of slavery or human trafficking:

- Policy of assessing suppliers within the labour supply chain, where labour has been provided outside the direct recruitment teams within Haygrove. This includes Operators working within the scope of the UK Government Seasonal Agricultural Workers Scheme (SWS).
- Policy of carrying out an ethical audit on key suppliers.
- Ongoing audit schedule to verify supplier conformity within the Growing Systems current supply chain.

Based on this, we have identified the following activities and operations to be at highest risk of infiltration in relation to slavery and human trafficking:

Within our own business:

- Recruitment of seasonal labour
- Use of external labour providers

**Within our Supply Chain:**

Sourcing from countries that may be deemed higher risk from time to time.

We also seek to continually review the operations of existing suppliers in relation to the risk of modern slavery and human trafficking.

**Due diligence processes in relation to slavery and human trafficking within Haygrove:**

To monitor and mitigate the risks of slavery and human trafficking occurring within our own business we undertake the following due diligence processes in relation to the recruitment and employment of all permanent, fixed term contract and seasonal staff:

- Key staff responsible for human rights in each business within the Group.
- Recruit directly where we can, with a dedicated and trained team of professionals
- Where we cannot, we use established labour providers who are approved and audited and registered with the relevant regulators and Home Office.
- Provide a detailed induction process for all new staff.
- Identity check for work eligibility of all staff prior to employment and hold records of all documentation.
- Key senior individuals within our UK business have attended Stronger Together training and Haygrove have embedded Stronger Together principles.

- Staff surveys are conducted periodically.
- Provide an anonymous report system for complaints and investigations.
- A Welfare team is provided within the UK to visit individuals and encourage open conversation regarding topics such as forced labour.
- Haygrove has committed to comply with the ETI Base Code.
- Haygrove has a Human Rights Policy.

**Due diligence processes in relation to slavery and human trafficking within Haygrove's Supply Chain:**

To monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains we undertake the following due diligence processes in relation to key suppliers:

- Haygrove ensure that our key suppliers are aware of our anti-slavery policy.
- Ethical questionnaires are distributed with our key suppliers and responses monitored.

**Staff Training**

We provide training to ensure that the key risks of modern slavery are understood.

**Monitoring of our due diligence processes:**

Haygrove carry out ethical audits on key suppliers who constitute more than 50% of our overall material spend. In addition, we endeavour to audit the key suppliers from low-cost countries. Haygrove have also carried out a supplier survey during the year focussing on the larger suppliers to the business. This survey included questions on compliance around labour use. These audits and surveys will continue on an annual basis.

This journey began in May 2016 with the implementation of ethical auditing within our supply chain.

**Future action**

As a result of Haygrove's assessment, we aim to take the following further steps over the course of the next financial year:

**Within our business:**

- Join the UK Modern Slavery Intelligence Network within the UK.
- Continue to focus training for supervisors and workers to report and record suspected cases of labour abuse.
- Appoint a senior individual responsible for group Human Rights, ethical trading, and CSR.
- Develop training within our induction of new staff processes raising the awareness of labour abuse.

- Whilst areas of our business have appropriate worker representation groups, we shall agree and distribute to all staff in the Group a whistle blowing process covering Human Rights, Ethical Trading and Modern Slavery.

**Within our supply chain:**

- Ensure annual ethical questionnaires are communicated to key suppliers and records of responses maintained and evaluated.
- Ensure social targets are evaluated alongside commercial deliverables.
- Establish and develop a process for responding to complaints or reported violations.

This statement has been approved by the Board of Directors. It will be reviewed and updated annually.