Anti-Slavery and Human Trafficking Statement

Spearhead International Limited is committed to ensuring it operates all of its group businesses in an ethical manner fully compliant with the Modern Slavery Act 2015. This statement reflects our commitment to ensuring that no form of modern slavery or human trafficking is tolerated within any of our business practices, nor those of any partners in our supply chain.

Our Business and Approach

Spearhead International is a leading integrated food and agricultural group with businesses based in the UK and Central Europe. Spearhead utilises an extensive network of partner growers for its main activity of primary production of crops.

This statement applies to all business within the Spearhead group regardless of location or type of activity undertaken.

Our reputation is paramount and we take our Corporate Social Responsibilities very seriously. We provide below a broad overview of how we aim to deliver a supply chain compliant with the legislation and that evidences our actions taken to prevent human rights abuses within our wider business network.

Relevant Policies

The following group policies underline Spearhead's commitment to ethical working practices:

Ethics Policy – This demonstrates the group commitment to high standards of professionalism and integrity, sets behavioural expectations of honesty, fairness and respectfulness and forbids taking advantage of others through dishonest, unethical or illegal practices.

Whistleblowing Policy – The group is committed to a culture of openness in which anyone can report legitimate concerns of malpractices or misconduct. The policy applies to employees, contractors, suppliers and customers of the group.

Modern Slavery Act Policy – The formal group Control Framework documents the specific policy guidance and assessment steps for determining supplier compliance with the principles of the Modern Slavery Act. The Control Framework is in the process of being introduced across the group.

All group staff are made aware of this statement which is held on the intranet and displayed on the group's website.

High Risk Areas and Due Diligence

The group's highest risk area within both our own operations and those of our partner growers is with seasonal workers. All labour agencies that supply to our UK companies are required to be GLAA (Gangmasters and Labour Abuse Authority) registered.

The formal Control Framework has been updated to evaluate the modern slavery and human trafficking risks of both existing and new suppliers.

For all suppliers it should be highlighted that as a UK based group we have legal responsibilities under The Modern Slavery Act 2015, and they should be advised that we consider our responsibility extends to them also as part of our supply chain.

All suppliers should be asked to identify:

1. Any risk areas concerning modern slavery or human trafficking within their business or supply chain
2. Actions they are taking to address them

In the absence of any identified risks, we should ask them to confirm that their own due diligence procedures satisfy them that they are compliant.

This should be carried out for all new suppliers and annually thereafter. Existing suppliers should be phased in from their next order.

For entering into contractual purchasing arrangements contracts should include:

1. Warranties that no slavery is used anywhere in the supplier's business or by any of the suppliers in its supply chain and that all necessary processes and policies have been put into place to ensure that this remains the case
2. The addition of indemnity provisions and rights to terminate for breach of our Anti-Slavery Policy.

Training

A programme of awareness will be introduced for key managers and supervisors who utilise seasonal workers in their teams. Senior management will be briefed on all progress made on implementing and continuing the supplier due diligence process as the Control Framework is implemented across the group.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking Statement for the financial year ending 31st December 2022.



Tomasz Zdziebkowski
Group Chief Executive
Spearhead International Limited