

# MODERN SLAVERY STATEMENT



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# LETTER FROM JOHN SHROPSHIRE

I am pleased to report that we have taken proactive, meaningful steps in implementing a structure of human rights across the business. G's are fully committed to ensuring modern slavery is not taking place in our operations and supply chains and to playing our part in preventing modern slavery.

We continue to build on the culture and procedures established in recent years, which have underpinned our operations throughout the Covid-19 pandemic. A newly devised human rights policy has cemented our commitment to upholding human rights within our own businesses and our wider supply chain. Our approach to addressing modern slavery and labour exploitation sits within this wider human rights strategy.

The ongoing war in Ukraine has presented challenges and uncertainty around the world. First and foremost, our thoughts are with those who have been affected and our immediate priority has been to support our Ukrainian colleagues through this extremely difficult time. The impact has changed the landscape of recruitment for this and future harvest seasons to come. In light of this tremendous level of uncertainty, we have demonstrated our capacity to adapt, adjust and remain agile while maintaining our firm dedication to preventing modern slavery and labour exploitation.

One of G's values is **TRUST** which guides us in what we do and how we do it. We support transparency and collaboration, and the people pillar of our ESG strategy drives our commitment to be recognised as a great place to work for all;

**'BE A GREAT PLACE TO WORK WHERE OPENNESS, RESPECT AND TEAMWORK ARE ENCOURAGED, IN A SAFE, ETHICAL ENVIRONMENT'.**

G's are a founder member of the Modern Slavery Intelligence Network (MSIN) and hosted the launch of the organisation at a conference attended by almost 200 members of the industry. I am pleased to report that G's were recognised for our work in the area of upholding human rights and preventing modern slavery when we received the Highly Commended Award at the Co-op Treating People Fairly Awards.

We recognise the ongoing challenge of labour shortages that we, and the wider industry are currently facing. UK agriculture is seasonal, and this necessitates our need for a temporary or seasonal workforce, which in turn increases risk in our business and in our supply chains. As part of our human rights due diligence process, we continue to develop our understanding, adapt our processes and actions, and respond to this ever-evolving landscape.

This statement refers to the financial year ending 7th May 2022 and sets out the steps we have taken to prevent modern slavery and human trafficking in our own operations and supply chains. This is our seventh modern slavery statement and is a continuation of our previous statements outlining the key steps we have taken.



John Shropshire  
Executive Chairman, G's Group



# STRUCTURE & OVERVIEW

The G's Group is a group of market-led farming and food processing businesses established in 1952. This Statement concerns all companies within the Group. These companies are as follows:

- Barway Services Limited
- Cambs Farms Growers Limited
- East Coast Growers Limited
- G's Fresh Limited
- G's Fresh Beetroot Limited
- G's Group Holdings
- G. S. Shropshire & Sons Limited
- J. B Shropshire & Sons Limited
- Sandfields Farms Limited

Today we supply all the major UK retailers and many in Europe with fresh salads, vegetables and prepared produce. Across the Group, policies and management systems are aligned to our shared values and ethical treatment of those who work on our sites.

## STRATEGY AND STATEMENT OVERVIEW

Our Modern Slavery and Exploitation strategy is based on four guiding principles:

**PREVENTION** - Robust systems.

**DETECTION** - Widespread awareness and proper use of intelligence.

**CASE MANAGEMENT** - Protecting victims and preserving integrity of legal cases.

**LEADERSHIP** - Setting expectations for supply chains and sharing expertise.

This is underpinned by our business values:

**TRUST** - Be a great place to work where openness, respect and teamwork are encouraged, in a safe, ethical environment.

**EFFICIENCY** - Be a highly effective, lean and fast-moving organisation from seed to shelf.

**QUALITY** - Provide outstanding quality and service to our colleagues and customers.

**EXPERTISE** - Be the experts in our field and never stop learning.

**CAN-DO** - Be committed and driven in our continuous endeavour to adapt and improve.

For ease of navigation, this statement is organised into six main workstreams:

<b>PREVENTION</b>	<b>1. POLICY FRAMEWORK</b>
<b>DETECTION</b>	<b>2. TRAINING</b> <b>3. INTELLIGENCE MANAGEMENT</b>
<b>CASE MANAGEMENT</b>	<b>4. SURVIVOR CARE</b>
<b>LEADERSHIP</b>	<b>5. SUPPLY CHAIN MANAGEMENT &amp; DUE DILIGENCE</b> <b>6. INDUSTRY COLLABORATION &amp; ENGAGEMENT</b>



# 1. POLICY FRAMEWORK

Our policy framework underpins The Shropshire Group's commitment to tackling modern slavery and is regularly reviewed and improved to remain relevant and maintain high standards across the business.

## HUMAN RIGHTS POLICY

Launched in 2021, our new human rights policy sets out our commitment to respecting human rights in line with principles and standards set out by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Ethical Trading Initiative Base Code (ETI Base Code) and International Labour Organisation (ILO) Conventions. This provides the overarching supporting structure within which other policies relating to modern slavery and labour exploitation sit. It clearly communicates the standards we expect in our direct and indirect supply chains.

## MODERN SLAVERY AND HIDDEN EXPLOITATION

Our Modern Slavery and Hidden Exploitation Policy for UK operations outlines the measures in place to prevent modern slavery and exploitation in the following areas: recruitment and onboarding, training, detection and monitoring, case management and victim support, labour providers, banking and pay, and customer facing roles. We have based our Modern Slavery Procedure for Spanish operations on practices successfully implemented in the UK and adjusted them to the specific cultural and operational context of our operations in Spain. These regularly undergo benchmarking to improve practicability of implementation. For global operations, the G's Statement on the Prevention of Labour Exploitation, Modern Slavery and Human Trafficking outlines the general principles held by the Shropshire Group on this issue. It also outlines specific areas of high risk which should concern businesses in their efforts to adhere to these principles, such as recruitment intermediaries and costs, including debts and loans.

## RESPONSIBLE USE OF LABOUR PROVIDERS POLICY

For our UK operations, we have a structured labour provider management procedure to ensure that all labour providers are fully risk assessed to identify potential risks of labour exploitation or breaches of company standards and commitments. This also sets out a framework for the implementation of a robust management system, including specific due diligence requirements tailored to the relationship between the Labour Provider and Labour User. This year we have continued to emphasise selection of low-risk agencies, according to well established KPIs.

## SUPPLY CHAIN

As a responsible business, the G's Group is committed to working to the principles and standards of the ETI Base Code and ensuring the fair treatment of its workers and those in its direct supply chain. The Ethical Trading Policy outlines the requirements for our suppliers, in alignment with the ETI Base Code. We ensure that a list of approved suppliers is regularly updated according to these requirements. Key supplier approval processes and risk assessments have been updated to reflect best practise in industry.



## 2. TRAINING

Building awareness and understanding of labour exploitation and modern slavery among our colleagues across the business is vital. The Group's modern slavery training programme is designed to continually develop the right skills and knowledge to ensure that exploitation is detected as early as possible and reported correctly, and that any resulting case is managed in a responsible, sensitive and timely manner. Our training programme is made up of four modules, each aimed at different roles across the business to ensure we reach as many people as possible while also targeting those who require more specific training.

### MODERN SLAVERY AWARENESS

The purpose of this module is to equip as many people as possible with an understanding of modern slavery, the potential indicators in the workplace, and clearly establish lines of reporting of any 'yellow flags' in the workplace. It is mandatory for colleagues directly managing teams of production operatives, employee committee representatives and other highly people-facing roles.

### MODERN SLAVERY FOR HR AND MANAGERS

This module ensures consistent implementation of the various company procedures designed to mitigate the risk of modern slavery, as well as developing an understanding of how they can contribute.

### MODERN SLAVERY FOR SITE CHAMPIONS

Each site assigns at least two Site Champions to assist the central ethics team with identification, reporting and case management on site. This training provides our Site Champions with a solid understanding of labour exploitation in the UK context as well as case management and victim care.

### RESPONSIBLE RECRUITMENT

Aimed at those with any involvement with recruitment, this module equips people with practical measures they can take to reduce the risk of modern slavery in their operations. It builds awareness of established processes for labour supply-chain due diligence, the nature and impact of recruitment fees, identifying and avoiding illicit recruitment intermediaries and proper reporting channels for modern slavery indicators.

### 3. INTELLIGENCE MANAGEMENT

The Group operates a 'yellow flag' system throughout its operations. The premise of this system is that many modern slavery indicators which colleagues spot in the workplace might in isolation seem insignificant. It is through reporting and investigating any such indicators, including those which might not turn out to be connected to a case of exploitation, that patterns can be established.

In addition to awareness training, clear reporting expectations ensure that intelligence is reported quickly and utilised in the most effective way. This includes case management and investigation processes which are sensitive to the risk of jeopardising victim safety and legal cases.

The 'yellow flag' strategy relies on a high number of reports, and the Site Champions embedded at each site have proven to be effective in maintaining report quantity and quality. To this end, there has been a continued focus on training Site Champions in 2021-22 which has been supported by regular and active communication with Site Champions regarding the importance of intelligence management.

The yellow flag reporting system and intelligence management mechanisms further contribute to industry collaboration, particularly the Modern Slavery Intelligence Network by sharing appropriate data to enhance effectiveness in disrupting modern slavery and labour exploitation in the UK.



# 4. SURVIVOR CARE

Decent employment has a crucial role in the recovery of many survivors of modern slavery and labour exploitation. Although many survivors access support through government mechanisms and/or through excellent services of the UK's many NGOs and legal practices, many are not able to or choose not to access these services.

Practical guidance and support for employers, in particular people services, managers and HR professionals, is provided through our Survivor Care Standards for Business Handbook. This draws on extensive resources and advice relating to the care of victims and highlights the significant and unique role that responsible employment can play in the recovery and development of survivors.

The purpose of this document is to equip employers to act as an 'ally' of survivors of trafficking both in navigating the support which is available to them, and in their recovery process during employment.

The handbook covers the following topics:

- **UNDERSTANDING AND NAVIGATING GOVERNMENT SUPPORT.**
- **TRAUMA-INFORMED CARE.**
- **DESIGNING A RECOVERY PLAN.**
- **SENSITIVITY AND EMPOWERMENT IN SURVIVOR CARE MANAGEMENT.**





# 5. SUPPLY CHAIN MANAGEMENT & DUE DILIGENCE

G's is primarily a producer business but uses third-party suppliers from 16 countries to ensure a consistent supply of quality produce throughout the year.

Our top 10 sourcing countries by gross sales value during the financial year 2021/22 were: UK, Spain, Senegal, Egypt, Poland, Netherlands, Italy, Portugal, Germany and France. Senegal, Egypt and Italy have been identified through our risk assessment as higher risk sourcing locations. All ethical due diligence requirements for suppliers are defined in the G's Fresh Supplier Approval Procedure and all suppliers receive a supplier's pack containing detailed ethical requirements. In 2021/22, we made further amendments to the pack to reflect changes in industry best practice.



As a minimum requirement, all programmed suppliers must register in the Supplier Ethical Data Exchange (SEDEX) and to complete its new Self-Assessment Questionnaire (SAQ); providing greater transparency, improved supply chain management and monitoring systems. Responses are monitored and assessed with the aid of the SEDEX Radar tool which supports identification of suppliers operating in high-risk environments or with workers more vulnerable to labour exploitation. Furthermore, all suppliers are screened using the new, updated version of the SEDEX Forced Labour Indicators tool, based on audit data, indicating where potential indicators of forced labour have been identified within our supply chain as well as ensuring that all non-compliances and observations raised during audits at supplier sites are properly addressed in a timely manner. All suppliers with supply chains that have a higher potential risk of forced labour have been requested to undergo forced labour training.

In 2022/23 we will continue to screen the produce supply chain through our risk assessment which facilitates new features of the SEDEX Radar tool, including forced labour risks. This comprehensive risk assessment enables us to prioritise activities and resources where the risk is highest.



We have made efforts to increase transparency in our goods not for resale (GNFR) supply chain and have identified several higher risk categories: waste and recycling sector, PPE suppliers and logistics, where we have prioritised our activities. The key suppliers in those categories have been requested to either register on SEDEX, complete G's specific SAQ or undergo G's internal audit covering aspects relating to modern slavery risks. In 2022/23 we will continue to work with our strategic GNFR suppliers from the higher risk areas to identify potential actions needed to protect vulnerable workers.

## 6. INDUSTRY COLLABORATION & ENGAGEMENT

Tackling modern slavery involves collective action and collaboration across industry and between government, business and the third sector. We are actively engaged in multiple industry collaborations including the Food Network for Ethical Trade (FNET), the Spanish Ethical Trade Forums and the Modern Slavery Intelligence Network (MSIN).

### CASE STUDY: CO-OP TREATING PEOPLE FAIRLY AWARD

In November 2021, G's Fresh won the Highly Commended Award in the Co-op Treating People Fairly Awards presented at the Strategic Ethical Trade Forum. This award recognised our sustained commitment to industry engagement. According to Co-op,

**"G's FRESH SUBMISSION SHOWCASED THEIR MATURE STRATEGIC APPROACH TO TACKLING MODERN SLAVERY THROUGH COMPREHENSIVE POLICIES, RESPONSIBLE RECRUITMENT, GRIEVANCE MECHANISMS AND COLLABORATION. THEIR ROLE IN THE ESTABLISHMENT OF THE MODERN SLAVERY INTELLIGENCE NETWORK (MSIN) SHOWS THEIR COLLABORATIVE APPROACH TO DEALING WITH THE ROOT CAUSES OF MODERN SLAVERY".**

Co-op judges highlighted G's commitment to shifting the industry and the active leadership played for more than a decade on modern slavery, openly sharing good practice for others in the sector to learn from. G's is putting processes in place regarding their commitment to the 'Employer Pays Principle' and United Nations Guiding Principles (UNGPs). Through this achievement, lessons have been learnt which include collaborating to tackle complex issues, being up front about potential issues and being open with customers and competitors to make meaningful change happen.



## CASE STUDY: G's SPAIN – USE OF LABOUR PROVIDERS

Since 2017 at G's Spain, all labour providers have been monitored to verify their compliance with Spanish legislation and the Group's standards. Before a labour provider starts working with us, they must complete and sign the Service Level Agreement (SLA), in which the following data is collected: data from both companies, services provided, applicable local and national legislation, training, payment, health and safety, hours, transport, accommodation, obligations and rights of workers, as well as commitments to comply with the Group's standards. In it, responsibilities are also agreed between both parties. Labour providers are audited every six months to measure their level of compliance and the risk associated with that compliance.

Since 2019, a section regarding modern slavery was included in the SLA ensuring that agencies include a policy in which they establish controls, training and mechanisms to avoid and prevent modern slavery. This allows us to associate a labour exploitation risk score to agencies and supports business units to choose those with least risk.

In 2021, the Responsible Use of Labour Providers policy was developed to outline the due diligence which must be carried out before and during the use of labour providers. The purpose of this is to have a documented and structured labour provider management procedure to ensure that all labour providers are fully risk assessed to identify potential risks of labour exploitation or breaches of company standards and commitments. The use of external labour providers is structured by three categories: programmed, contingency and emergency. This allows us to have greater control over the assessment of labour providers in order to use those with the lowest risk on modern slavery and have improved planning processes for audits during peak season.



# COMMITMENTS UPDATE

We continually monitor and review the effectiveness of our processes and actions through key performance indicators related to modern slavery, labour exploitation and supply chain due diligence. These are updated on a regular basis and we are proud to say that we have achieved seven targets to strengthen our approach, and working to achieve the remaining four targets over the course of the year. For full transparency, we have included an update on progress for each target with details on what we said we would do in 2021-22 and what we have done to achieve it.

COMMITMENT 2021/22	OUTCOME	
<b>TRAINING</b>		
The core internal training requirements mandated by the G's Modern Slavery Policy UK will be maintained. New Site Champions will be identified and trained in Modern Slavery.	30 (60%) Site Champions and Forum Members have received Modern Slavery for Site Champions training. This is an increase from 17 Site Champions trained in the previous year.	●
All colleagues with any involvement in recruitment will be required to complete the Responsible Recruitment training module.	In the UK, 55% of those involved in recruitment have completed this training. This is a great improvement upon last year's total of 11%.	●
The modern slavery training programme will continue to be expanded in non-UK operations, increasing the number of roles reached.	We have successfully completed our training programme to 123 colleagues (87% of those required) in our Spanish operations and 24 (100% of those required) in our Polish operations.	●
<b>INTELLIGENCE MANAGEMENT</b>		
'Yellow flag' reporting will continue to be monitored to ensure consistent application across the group through active and regular communication with Site Champions.	'Yellow flag' reporting continues to be applied consistently and regularly monitored. This is supported by active communication with Site Champions to share updates.	●
Detailed and useable audit tools and risk assessment will continue to be refined and extended to non-UK operations, specifically Poland.	We have continued to refine our audit and risk assessment tools to support the 100% completion of assessment for Polish agencies.	●
<b>SURVIVOR CARE</b>		
Guidance as well as formal procedures and case risk assessment tools for internal victim support will be refined and improved, with a goal of developing an industry standard in this area.	Guidance was used for refresher training on modern slavery. We are yet to refine our risk assessment tools further and will focus on this for the upcoming year.	●
<b>SUPPLY CHAIN</b>		
Recruitment risk assessment and internal modern slavery prevention systems benchmarking will continue to be expanded in our non-UK operations	100% of our Spanish and Polish business units have been risk assessed and benchmarked.	●
Specific programmes of engagement with high-risk programmed suppliers will replace the Modern Slavery SAQ.	27% of all programmed suppliers have been identified as high-risk. Of these high-risk suppliers, 100% have been requested to undergo modern slavery training.	●
Additional efforts will be made to increase transparency in our Goods Not For Resale (GNFR) supply chain, including assessments and strategies put in place for targeted GNFR suppliers.	Five suppliers have been engaged and identified as higher risk. There are three areas of risk identified which include waste and recycling, PPE and logistics.	●
Specific programmes of engagement with high-risk programmed suppliers will identify training opportunities to increase the proportion of suppliers undertaking modern slavery training.	100% of all UK high-risk suppliers requested to undergo/complete modern slavery training. 28 UK external suppliers have been contacted and 86% have completed Stronger Together training or GLAA training.	●
<b>ENGAGEMENT &amp; LEADERSHIP</b>		
The pilot phase of the Modern Slavery Intelligence Network (MSIN) will be completed.	G's, along with other MSIN members, successfully completed the pilot phase and hosted a conference to formally launch the network within industry.	●



# TARGETS 2022/23

Over the next year, we will build on the progress we have made and continue to uphold our commitment to addressing modern slavery and labour exploitation within a wider human rights framework. In particular, the focus and targets for 2022-23 will include:

**CONTINUED EXPANSION OF OUR TRAINING PROGRAMMES, ADDING NEW STAKEHOLDERS AND INCREASING THE SCOPE OF MATERIALS.**

**INCREASED COMMUNICATION WITH SITE CHAMPIONS TO INCLUDE REGULAR UPDATES AND REFRESHER TRAINING.**

**CONTINUED REVIEW AND UPDATES OF AUDIT AND RISK ASSESSMENT TOOLS FOR AGENCIES IN UK AND NON-UK OPERATIONS.**

**IMPROVEMENT OF SPECIFIC PROGRAMMES OF ENGAGEMENT WITH HIGH-RISK SUPPLIERS OUTSIDE THE UK, WHICH CAN THEN BE USED TO IDENTIFY NEW TRAINING OPPORTUNITIES.**