

## **NATOORA LTD 'NATOORA GROUP' - MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024**

### **INTRODUCTION**

Modern slavery and human trafficking are serious crimes and a gross violation of fundamental human rights. These take various forms, all of which have in common the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain. Natoora has a zero-tolerance approach to these crimes and we expect the same standard from all of our suppliers and contractors.

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the steps that we have taken to prevent modern slavery and human trafficking within our business and supply chains and applies for the year ended 30 April 2023.

### **OUR BUSINESS AND ORGANISATION STRUCTURE**

Natoora Ltd, is an established, premium fruit and vegetable wholesaler, with its global headquarters in London, and offices in Paris, Copenhagen, New York, Miami and Melbourne. We operate through a number of entities, all of which are subject to significant external regulation and oversight. For the purposes of this statement, our supply chains include those companies and entities within the Natoora Group which supply us.

We employ our people to provide services, food expertise and advice to our clients and we may refer to external contractors to provide services where we are unable to do so in house.

Our suppliers include growers, farmers, food producers and wholesalers, among others. We source roughly 80% of all our products directly from producers and 20% through wholesalers and markets.

### **OUR POLICIES**

Natoora Ltd upholds the highest standard of professional conduct in our business dealings, acting with integrity and demonstrating the fair, equal and humane treatment of all people.

We follow the Code of Conduct and Practise set out by ACAS (the Advisory, Conciliation and Arbitration Service for UK and Ireland).

Our clients and staff must comply with these ethical principles, rejecting any form of harassment, victimisation, or discrimination against colleagues, suppliers, or other parties. Such behaviour is deemed gross misconduct and can lead to serious disciplinary actions,

Natoora Ltd.

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including dismissal. Furthermore, our practices align with the Equality Act 2010, which outlaws discriminatory behaviour, victimisation, and harassment. We maintain a robust Whistleblowing policy, revised in January 2023 and available in our employee handbook. Our employees are encouraged to report concerns confidentially to our People Team, benefiting from legal protection for disclosures. No incidents of slavery or trafficking were reported in the past year.

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

We continue to assess the risks of slavery and human trafficking within our own business. Our recruitment policies include ensuring that all candidates produce original documentation confirming that they have the right to work in the UK, prior to commencing employment.

All of our people are engaged on written contracts which guarantee their pay and benefits. We provide counselling, mental health support and trained mental health first aiders for our team and we offer training on how to identify and manage mental health issues.

We continue to believe that the risk of modern slavery and human trafficking within our own business remains low. Around 80% of our produce is bought directly from farms we visit regularly - many of which we have worked with for a significant number of years. When visiting farms our buying team is checking that suppliers are following our standards in terms of how they grow but also in terms of how they treat their employees.

We continue to contact significant suppliers to seek their commitment that they share our zero-tolerance approach to these risks. They have also been asked to confirm what steps they take to ensure these risks are not present within their own supply chains. In the event of our teams identifying a concern with their processes we would immediately open a thorough investigation and act accordingly.

As part of our tendering processes, we have obtained suppliers' own Modern Slavery statements where possible.

We have also referred to the [International Labour Organisation's Indicators of Forced Labour](#) and we have not found, or been made aware of, any such instances in our business or supply chain. However, if any were highlighted to us, we would act immediately in accordance with our legal and moral obligations.

## **TRAINING AND RAISING AWARENESS**

This statement is shared with our people with a clear explanation of the background, the current risks in our business and society and what steps we take to help eradicate these crimes.

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All new joiners receive this statement as part of their overall onboarding. Our whistleblowing policy is also included and explained during this standard induction.

## **FURTHER STEPS AND MEASURING EFFECTIVENESS**

We continue to raise internal awareness by reminding our people to report any concerns they have. Our procurement policy is being enhanced and further improved. During the coming months, we will launch a new supplier onboarding and diligence process. Assurances will be requested from all new suppliers on their Modern Slavery approach before they commence a relationship with Natoora Ltd 'Natoora Group'. Finally, we will be introducing updated engagement terms with our clients. These require all of our clients to confirm they adhere to all modern slavery and human trafficking legislation, including, but not limited to, the Modern Slavery Act 2015.

We will measure the effectiveness of our policies and processes by monitoring the number of our suppliers and clients which accept our terms and the number, if any, that do not accept or which raise any issues. We will not work with those who don't accept it or after an investigation that might lead to a supplier not adhering to the statement. We also continue to record concerns or incidents raised via the whistleblowing policy or otherwise reported to us.

This statement reflects Natoora's unwavering dedication to combat modern slavery and human trafficking, fostering ethical and responsible business practices.

DocuSigned by:  
  
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Federico Cervellin  
Chief Product Officer  
**Natoora Group**

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