Modern Slavery Statement - 2024

1. Introduction

1.1. This statement covers the following entities:

- A Pearson Holdings Ltd
- A Pearson Growers Ltd
- APS Produce Ltd
- The Tomato Stall Ltd
- APS Growers Ltd

1.2. Our group grows and packs fresh produce for its customers. The financial year runs from 1st January to 31st December. Within the supply of fresh produce there are relationships with external businesses for the sourcing of products at certain times of the year (imports etc.) and consumables. These businesses as well as the suppliers of services make up the supply chain networks within the APS Group.

1.3. APS Group understands that Modern Slavery and Human Trafficking is an increasing risk to our business, and we are committed to reducing and eliminating any potential acts of modern slavery from within the business and our supply chains. As a company, we understand that we are responsible for the enforcement of the Modern Slavery Act 2015 and will ensure that all APS organisations, suppliers, and services of the business comply.

2. Purpose of this Statement

2.1. This statement is reviewed annually with the aim of informing our employees, suppliers, customers and other stakeholders about the company and its commitment to prevent acts of modern slavery, human trafficking, forced labour and labour rights violations in its business and supply chains.

3. Identified risks and steps being taken in APS Group

Direct Employees

3.1. APS Group alleviates the likelihood of modern slavery occurring within its teams of direct employees through strict and thorough recruitment and HR procedures. As part of our robust recruitment system, all personal details and right to work information provided are checked thoroughly.

3.2. APS Group provides information on "Hidden Labour Exploitation" to our workforce through a variety of formats such as workplace posters, worker leaflets, during the induction and training period and through internal auditing processes.

3.3. We also carry out random internal bank account checks two to three times a year to ensure no more than two people are sharing bank accounts.

3.4. APS Group are committed to operating within the ETI base code and regularly undergo external ethical audits as well as customer audits, including BRC, SMETA and GRASP.

3.5. APS regularly conducts a risk assessment using the Stronger Together progress reporting tool of our internal systems and policies as well as our due diligence regarding our Suppliers. We have developed a priority action plan with improved monitoring and communications highlighted as key action areas.

3.6. Our Modern Slavery Response Plan and Remediation Procedure has been reviewed and trained across all sites within the business to ensure that front line Team Leaders and Supervisors know what to do if they suspect instances of modern slavery within their teams.

3.7. We conduct annual refresher training for front-line Team Leaders, Supervisors, employee representatives and agency co-ordinators to ensure they have the knowledge to recognise red flags within the workforce and understand where to get specialist advice or help if they encounter potential labour rights violations.

3.8. Our Modern Slavery Champion meets regularly with representatives of each function attending as well as Board level input from the Group Technical Director and the Group HR Director with the objective of reviewing policy, setting targets and measuring performance.

Employees through recruitment agencies and other sources

3.9. Agency workers are recruited indirectly by APS Group through trusted, well established, and accredited sources who provide full assurance that they fully comply with all legal requirements regarding the rights and welfare of employees.

3.10. Thorough internal audits are carried out on all our agency providers across the group once a year, as well as payslip audits with random agency workers at each site where 10% of the agency workers are interviewed about their pay and treatment from their employer as well as their recruitment being in line with industry best practice.

3.11. The results of employee surveys conducted by our agency partners have been shared with us with a focus on the worker hours, accommodation and the recruitment process.-Quarterly meetings have taken place with senior management from our labour providers, any issues that come to light are raised, documented, and discussed within these meetings with action plans generated from lessons learned.

4. Identified risks and steps being taken in our Supply Chain

4.1. Some of APS Group's supply chain has been identified as being in high-risk countries with regards to Human Rights.

4.2. Our suppliers are regularly reviewed in all aspects of the business, if an instance of modern slavery occurred then the suppliers are required to let our senior management team know and provide regular updates regarding any investigations.

4.3. As part of the company's due diligence process, the supplier approval process incorporates a review of the controls undertaken by our supplier partners in the UK< EU and outside the EU. If our risk assessment deems it necessary, some suppliers are already required to have SMETA audits. Senior Managers will continue to risk assess our supply base to ensure that the risk of modern slavery and human right violations is minimised.

4.4. APS Group will not support or deal with any business knowingly involved in slavery or human trafficking and will report any findings immediately to the GLAA.

5. Director level responsibility

5.1. The Company Directors and Senior Management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources, training, and investment to ensure that slavery and human trafficking is not taking place within our business or our supply chains. This statement is approved at board level and reviewed and published annually.

6. Our key actions for 2024

6.1. APS Group are committed to gaining a greater understanding of our Supply Chain and undertake further due diligence regarding their recruitment and labour practices, through supplier and grower assessments and improved supplier agreements with the aim of working towards greater transparency.

6.2. Ongoing awareness and training for Supervisors & Team Leaders, and specialist Stronger Together training to be routinely delivered and kept up to date for HR And Operational Managers.

6.3. We continue to work together with our Labour Agency partners to monitor closely both direct and indirect staff to ensure that we prevent any occurrence of modern slavery, human trafficking, forced labour and violations to labour standards within the APS Group with specific emphasis on out of country recruitment and the Grower seasonal worker checklist.

6.4. We aim to refresh our social strategy, revisit and update our ways of working with our supplier partners to ensure that our ethical requirements are clearly communicated ad well understood, and to ensure we provide adequate support where necessary with the implementation of improvements and best practice.

6.5. We will regularly survey all APS staff as well as agency workers as part of our two-way communication process highlighting the company policy and how we support victims of modern slavery.



David Hoult
Chief Financial Officer
June 2024