MODERN SLAVERY ACT – HALLHUNTERPARTNERSHIP (FARMING) SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 1ST JANUARY 2024 TO 31ST DECEMBER 2024

Organisation
This statement applies to Hall Hunter Partnership (Farming) (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2024.

Organisational structure
Hall Hunter Partnership (Farming) (HHP) is a family owned business located in Berkshire and Surrey that was founded in 1966 and is now a leading UK grower of strawberries, raspberries, blackberries and blueberries.

The business currently farms over 600 acres; growing in industry leading substrate systems which produce thousands of tonnes of fruit each year for our major customers Tesco, Waitrose, Lidl, Coop and Marks & Spencer.

Every berry that we grow has to be carefully picked and looked after to ensure that it reaches our customers in perfect condition. So we need lots of help each year to grow the plants, harvest the berries, pack them and transport them to our customers. The main type of work on the farm is picking. Over 1500 people are employed directly and accommodated at our 3 production sites at the height of the season.

We also operate a state of the art cool chain, controlled atmosphere storage and logistics operation. We pack all of our own soft fruit, together with some from other UK growers.

Our business objectives are:

Growing Great Crops
- We produce the best quality soft fruit available to the UK market by growing the best varieties in innovative growing systems, supported by market leading cool chain technology and logistics.

Growing Great People
- We recruit, retain and develop individuals who aspire to be the best growers and managers in British horticulture.

Growing Great Environments
- Our systems are designed to be sustainable for many years to come, supporting as broad a biodiversity as is possible in and around our farms.

The labour supplied to the Organisation in pursuance of its operation is carried out in Wokingham, Twyford and Godalming.

Definitions
The Organisation considers that modern slavery encompasses:
- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment
We at HHP are committed to ensure that we operate in an ethical manner in all that we do. Whilst we are happy that our standards are being met within the Company relating to the recruitment and employment of our team, we recognise there is scope in our supply chain for slavery and human trafficking to occur. The Organisation takes a zero tolerance approach to slavery and human trafficking.

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.

Supply chains
In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of seasonal workers, plants, growing, packing and picking materials from various suppliers. We are continually building and improving our due diligence systems to map, risk assess and minimise the risk of Modern Slavery in our supply chains.

Potential exposure
The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its labour supply chain because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively high and it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps
The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Working closely with, and supporting the GLAA.
- Keeping up to date with current trends on the subject.
- Having a robust and transparent recruitment and selection process which has been refined and improved continuously over the years and working only with reputable and licences labour providers.
- Educating our managers and team leaders on how to spot those who may be vulnerable.
- Having specific training sessions on modern slavery, including awareness-raising of the signs of modern slavery and information on how to raise complains

- Educating our managers and representatives who visit suppliers world-wide on what to look for.
- Supporting the Stronger Together campaign and attending the Stronger Together Modern Slavery Training sessions.
- Actively engaging with the Seasonal Worker Scheme (SWS) Taskforce to 'work collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers' rights in the UK Seasonal Worker Scheme (SWS) and wider UK horticulture.
- Reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- Running worker committee representatives' elections annually and facilitating regular worker forums.
- Raising awareness for available channels for reporting anonymously via our confidential reporting Integrity hotline. Additionally, the established regular Staff Surveys include key indicators of potential exploitation, and HR data is also analysed.
- Providing Employee Assistance Programme and having an Open Door Policy
- Promoting the use of the Just Good Work App
- Regularly communicating with workers to reinforce our commitment to tackle modern slavery and empower them to come forward and ask for help.
- Adopting the ETI base code, including the Code of Human Rights, Basic Working Conditions and Corporate Responsibility, to address workplace issues such as working hours, child labour, forced labour, non-discrimination, freedom of association, health and safety and the environment. This applies to our own operations, but we also encourage businesses throughout our supply chain to adopt and enforce similar policies in their own operations.
- Having a highly professional and well-trained HR Department responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking and identifying the business practices which are in place to ensure effective reporting and effective action to address modern slavery.
- Conducting regular internal HR welfare clinics and site visits during which randomly selected workers are met and encouraged to give feedback and raise concerns.
- Having formal HR procedures governing onboarding and recruitment to prevent unlicensed Gangmasters, illegal working, discrimination, or exploitation. These procedures also aim to identify and capture information about informal referral in order to help identify covert labour intermediaries.
- Adopting an Awareness-Raising programme such as staff training, distributing flyers to employees and putting up posters across the organisation's premises on how employers can identify and prevent slavery and human trafficking, what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and what external help is available, for example through the Modern Slavery Helpline.
- Expanding our knowledge and ability to assess and manage modern slavery risk by working collaboratively with external stakeholders, such as The Food Network for Ethical Trade (FNET).
- Health and Safety Collaboration – leading an initiative to build a network of fresh produce H&S experts to collectively address and share on farm best practice. We not only address the physical harm to workers but also their mental health and wellbeing.
- Promoting the Just Good Work App. amongst our workforce and encouraging them to use it as it provides workers access to pre-departure information and allows them to query issues on a secure and confidential platform.

Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains:

- Minimum of 70% seasonal workers return rate
- Maximum of 10% seasonal workers turnover
- 100% pass rate on all audits
- Worker Engagement and Feedback- monthly worker forums and welfare clinics on all 3 production sites and non-farming departments. Seasonal workers taking part in 3 surveys (arrivals, mid-season and leavers)
- 90% of key staff and managers trained annually (target 100%)

Policies

Policies are crucial for developing anti-slavery and anti-trafficking standards across the business and will influence suppliers' and employees' decision making on day-to-day basis. The Organisation has the following policies which further define its stance on modern slavery and assist to assess, prevent and mitigate the risk of modern slavery existing in the organisation and its supply chains:

- Recruitment Policy- we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy- we operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Anti-Slavery and Human Trafficking Policy- this policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Preventing Hidden Exploitation Policy, Training and Development Policy, Anti-Corruption and Bribery Policy, Ethical Policy, etc.

Every member of the management team is responsible for ensuring that relevant policies are upheld and implemented within our business and supply chain.

Slavery Compliance Officer

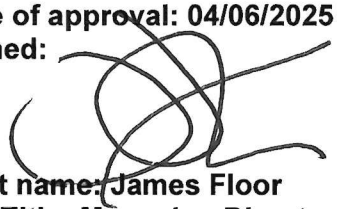
Our UK Managing Director takes overall responsibility for overseeing our Modern Slavery commitments. The Organisation has a Slavery Compliance Officer (our HR Manager), to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

We are regularly audited by third parties who publish our results on the Supplier Ethical Data Exchange (Sedex).

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers and in relation to our own operations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and has been approved by the Company's Managing Director and will be reviewed and updated annually.

Date of approval: 04/06/2025
Signed:



Print name: James Floor
Job Title: Managing Director