

Modern Slavery & Human Trafficking Statement FY 19/20

Introduction

Greenyard Fresh UK Ltd offers the following statement in accordance with the UK Modern Slavery Act 2015. This statement covers activities regarding the detection and prevention of Modern Slavery and human trafficking in our operations, and our supply chains for the year ending 31st March 2020. Furthermore, we are fully aware of the impact of the Covid-19 pandemic on our supply base. We have also detailed a set of challenging targets for the Financial Year (FY) 2020/2021 and will report our progress against these actions in subsequent statements.

Greenyard Fresh UK are committed to procuring fruit from growing regimes that share our common principles of Ethical Trade. We are opposed to all forms of Forced or Bonded Labour and Modern Slavery.

Our Structure and Supply Chains

Greenyard Fresh UK Ltd is part of the Greenyard Group (Euronext Brussels: GREEN). Greenyard is a global market leader of fresh, frozen and prepared fruit & vegetables, flowers and plants. More information on the Greenyard group can be accessed on our corporate website: <https://www.greenyard.group/>

Greenyard Fresh UK Ltd is a grower, importer, ripening facility, packer and distributor of fresh fruit, dried fruit and nuts to the UK market. Greenyard Fresh UK source produce globally, from 6 continents and 47 countries. More information on Greenyard Fresh UK can be accessed on our website: <https://www.greenyardfresh.co.uk/>

The 'Greenyard UK Ethical Strategy 2020-2022' was developed to drive continual improvement, assess compliance against our standards and build closer working relationships with our suppliers. This strategy has influenced our approach to combatting Modern Slavery.

Policies and Procedures

As identified in the 'Greenyard UK Ethical Strategy 2020-2022', we recognise the need for robust policies and procedures to be implemented across our operations and for the management of our supply chains. Therefore, we have reviewed and amended our existing policies in line with current business need and supplemented these with new policies where suitable. As such we now have a robust Ethical Management System consisting of multiple policies and procedures, some of which are listed below:

- Ethical Trading Policy
- Human Rights Policy
- Preventing Hidden Labour Exploitation Procedure
- Whistle-Blowing Procedures
- Temporary Agency Provider Assessment Procedure
- Supplier Due Diligence Procedure
- Serious Ethical or Human Rights Issue Management
- Remedial Process for Serious Ethical or Human Rights Issues
- Ethical Sourcing High Risk Countries

We will continue to review these procedures over the course of FY 20/21, and amends or additions will be made as required.

Training, Awareness and Capacity Building

Greenyard Fresh UK recognise that Modern Slavery is a complex issue, and that training and capacity building is fundamental in preventing and detecting Modern Slavery. We have focussed our activities on our supply chains and our own operations:

Our Supply Chains

Greenyard Fresh UK are members of the Global Business Steering Group for the Stronger Together South Africa programme. All our South African exporters, packhouses and growers have been encouraged to register for workshops. We will continue our support of this programme in FY 20-21, engaging with other suppliers to attend a workshop, along with ensuring suppliers who have already engaged continue their journey, and implement robust practices.

Greenyard Fresh UK Operations

Greenyard Fresh UK have focussed our efforts on building awareness and capacity building within our own operations in FY 19/20. At our UK sites, all new employees are taken through the Stronger Together Initiative, provided handouts and shown a film to increase understanding of Modern Slavery. Posters are displayed in multiple languages across the sites, and Modern Slavery has been included as a specific agenda item for the monthly Colleague Forum and discussed at Board meetings. Greenyard Fresh UK supported Anti-Slavery Day (18th October 2019) by raising awareness throughout our operations.

Developing Partnerships

Greenyard Fresh UK recognise that Modern Slavery is a global problem that affects multiple countries, industries and sectors. We also recognise that the best way to combat Modern Slavery is by partnering with like-minded individuals and organisations to share and enhance knowledge. We continue to work with numerous industry experts throughout FY 19/20, to share and enhance our knowledge:

Organisations	
Gangmasters and Labour Abuse Authority (GLAA)	Supplier Ethical Data Exchange (SEDEX)
Association of Labour Providers (ALP)	Stronger Together in the UK and South Africa
Food Network for Ethical Trade (FNET)	

In addition to the above Non-Governmental Organisations, we are active in sharing knowledge and experiences at numerous customer events. This has included presentations at our customers, Supplier Conferences and Forums, along with engaging at multiple customer and industry events.

Greenyard Fresh UK has been an active member of the Food Network for Ethical Trade (FNET) for 2 years. FNET is a supplier-led initiative that aims to improve human rights in global food supply chains through a common approach to managing ethical trade. Membership of this network has provided Greenyard Fresh UK the opportunity to interact and learn from different sectors across the food industry, along with providing a suite of resources to improve our own approach to combatting Modern Slavery.

Risk Assessment, Management and Due Diligence

Our Supply Chains

Greenyard Fresh UK are AB members of SEDEX and therefore utilise the resources within that system to monitor ethical compliance and potential indicators of Modern Slavery within our supply chain. Every supplier is assessed using the risk assessment and forced labour indicator tools on SEDEX to identify areas of high risk, and where appropriate we insist on suppliers being audited by an independent third-party audit body to a recognised audit standard. The audit results, any Non-Compliances and evidence of corrective action implementation are then shared with us, and the relevant customer(s) on the SEDEX system, and successful closure must be demonstrated.

Our monitoring programme includes measuring Key Performance Indicators to identify areas of concern, and any emerging trends. Where an audit identifies issues that require further investigation, we will travel to the site to liaise further with the suppliers.

We have additionally utilised the tools made available to us as members of FNET to assess risk and implement practical controls. We have identified agency and accommodation providers within our UK supply chains, supported our suppliers in assessing this risk, completing due diligence and raising their own knowledge base.

Greenyard Fresh UK Operations

Risk Identified	Mitigating Control (s)
Ethical and Modern Slavery risks in our packhouses	<ul style="list-style-type: none"> ● Robust recruitment processes ● Third party SMETA audits conducted at our sites with results uploaded to SEDEX ● Stronger Together Resources implemented at induction ● Continued membership of the Association of Labour Providers (ALP)
Agency Providers to our packhouse operations	<ul style="list-style-type: none"> ● Temporary agency providers must be GLAA licensed ● Conduct 6 monthly audits by our in house trained personnel ● Temporary agency providers must be Stronger Together Business Partners and keep up to date with changing legislation and trends.

Modern Slavery System Effectiveness

To ensure continual improvement of our approach, during this FY we completed the Stronger Together Progress Reporting Tool. The tool is an online self-assessment, which supports companies to measure progress made and to highlight their next steps. We will complete the tool again during FY20/21 to track progress and improvements.

During the reporting period, Greenyard Fresh UK did not uncover any instances of confirmed Modern Slavery or Forced Labour within our operations or our supply chain. Our programme highlighted a number of serious

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issues that were dealt with as part of our processes, however upon investigation these were not considered to be Modern Slavery or Forced Labour.

Targets FY 20/21 and Beyond

Our key focus for FY 20/21 surrounds Brexit and the Immigration Bill 2020 and how this affects our UK growers. We need to have a full understanding of plans for recruitment and managing increased exploitation risks due to the employment law changes.

We are committed to evolving our programme to combat Modern Slavery, and as such have outlined challenging targets for FY 20/21. These have been shared with our key customers to ensure accountability.

This statement has been prepared in accordance with the UK Modern Slavery Act 2015 and has been approved by the Greenyard Fresh UK Board of Directors.



Bill Mathieson

Managing Director- Greenyard Fresh UK

Modern Slavery Targets- FY 20/21

We are committed to evolving our programme to combat Modern Slavery, and as such have outlined these challenging targets for FY 20/21:

Policies and Procedures	
1.	Develop the Greenyard Fresh UK Ethical Trading Strategy to replace to 2018-2020 version.
2.	Conduct a formal review of our Recruitment Process, utilising Responsible Recruitment toolkits, resources and best practice to identify and implement improvements.
3.	Improve Supplier Scorecard process to enhance Ethical scoring from 'Compliance' approach to 'Continual Improvement' approach.
System Effectiveness	
4.	Develop a suite of Key Performance Indicators in relation to Tackling Modern Slavery within our own operations: <ul style="list-style-type: none"> a. Diversity figures b. Shared Personal Details c. Language Levels
5.	Utilise the Stronger Together Reporting Tool to develop robust corrective action plans, measuring improvement on a Year on Year basis
Risk Assessment & Due Diligence	
6.	Collaborate with site agency provider to identify areas for improvement, share best practice and minimise risk.
7.	Collaborate with one strategic exporter in a key overseas market to establish agency provides within grower base, controls in place to manager risk and identify any required improvements.
8.	Identify salient Human Rights & Modern Slavery risks within our Supply Chains, and a top-level plan to mitigate.
Training, Awareness & Capacity Building	
9.	Liaise with key South African exporters to ensure Stronger Together training is widespread amongst their supply base
10.	Increase attendance and participation at industry and customer events to increase our knowledge of Modern Slavery and share best practice.
11.	Attendance of Stronger Together Global Supply Chains training for key employees including Technical, HR and operations
12.	100% of colleagues to have received Modern Slavery training appropriate to their role through induction and specific ethical training sessions with FNET