



## G's Growers Ltd Modern Slavery Statement 2018/19

G's Growers Ltd is aware of modern slavery risks and acknowledges responsibility to the Modern Slavery Act 2015. We are committed to establishing action plans to reduce incidence of slavery and human trafficking within our own businesses and our supply chain.

G's Growers Ltd commits to respecting human rights, will avoid infringing on the human rights of others and will address any issues that are identified. This will include taking adequate measures for prevention, mitigation and, where appropriate, remediation of incidences of modern slavery found in our business and in our supply chain.

### Structure of the Business

The G's Growers Ltd group is a farm produce co-operative collectively marketing its member's produce and providing plant raising, harvesting and packing services to them. This Statement covers the activities of the following entities;

G's Growers Limited  
G's Growers Nurseries Limited  
G's Growers (Ramsey) Limited  
Salads Harvesting Services Limited

### Supply Chain

G's Growers Ltd is recognised as a Producer Organisation and sources product from its grower members. The products sourced include wholehead and baby leaf salad, celery, radish, onions, salad onions, beetroot, mushrooms and speciality lettuce including Chinese leaf. In addition to the product sourcing the subsidiaries purchase goods and services related to site or field operations including peat, labour, machinery, equipment, building and office services, and utilities from a range of suppliers principally located in the UK.

## 1 G's Growers Ltd Operations - Outline of Risk and Strategy

*The employees of the group work within UK farm and food processing businesses in a variety of roles. The risks inherent in the industry are recognised, and as such it is appropriate to design processes both to protect potential victims amongst our employees and to equip those in leadership roles to play their part in monitoring for exploitation.*

*The ongoing focus areas for the group in the UK are as follows:*

*Firstly, to risk-assess and where necessary improve recruitment / onboarding processes and so reduce the likelihood of third-parties to exploit by arranging unofficial and hidden recruitment channels.*

*Secondly, to increase the likelihood of detecting any situation of such exploitation via a programme of widespread training.*

*Thirdly, to ensure that should any case occur, there would be clear procedure and responsibility regarding the immediate and long-term response – in order to protect both the victims and the conduct of potential future criminal cases.*

## 1.1 Prevention – Recruitment and Awareness

Our onboarding procedures are designed to highlight whether a candidate is in a potential situation of exploitation. The New Starter form captures information regarding informal introductory channels and induction materials relating to exploitation and modern slavery are designed to be engaging to their target audience. In 2019-20, further risk assessment of recruitment processes will be undertaken, and improvements made as necessary.

## 1.2 Detection, Training and Monitoring:

A training programme is in place which focuses on raising awareness among key employees. This training is delivered both via the GLAA Academy and via a collaborative arrangement with a partner business on an ongoing basis. It is envisaged that 66% of our employees will, over time receive this training. To date within the group 19% of employees have received training with a range of 0% to 25% within individual entities. The intention of this training is to increase the reporting of potential indicators of exploitation to a central investigations team which was setup as part of the collaborative agreement. In 2018/19, training for managers was further adapted to cover the broader topic of 'responsible recruitment'. In 2019/20, this training will be further rolled out, and additional training provided to enable employees who visit supplier sites to be aware of risk indicators.

## 1.3 Policy and Process - Case Management and Victim Support

If a case of exploitation is uncovered or suspected, it is crucial to manage the situation effectively in order not to endanger the victim(s) or any future criminal case. For this reason, clear reporting channels have been established to ensure that the crucial processes recommended by the GLAA regarding case preservation are maintained. Guidelines and procedures relating to the prevention of modern slavery are included in an internal 'Handbook' and in 2018/19 were incorporated more formally in company policy both of which have been developed as part of our collaborative agreement with a partner business.

## 2 G's Growers Ltd - Supply Chain Due Diligence

The supply chain of the group is comprised primarily of sourcing from its grower members. All grower members have signed formal Supplier Agreements which detail their commitment to the Ethical Trading Initiative Base Code and to exercise due diligence over any labour providers they may use. In addition, all members have been risk assessed using Sedex (Supplier Ethical Data Exchange) and additional information and are subject to Ethical Supplier Approval which includes the use of second and third-party audits to mitigate risk where necessary. In addition, grower members have attended third-party training regarding exploitation and modern slavery and have rolled out such training internally as appropriate according to the size of their operations. With regards to the non-produce supply chain, to date, there has been no due diligence as this is deemed to be immaterial and of low risk.

This statement has been approved by the Board of G's Growers Ltd on 7<sup>th</sup> November 2019 and signed on its behalf by the Chairman, Rodney Baker-Bates. It will be reviewed annually.



Rodney Baker-Bates