



G's Growers Ltd Modern Slavery Statement 2021/22

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 prevent the 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 babyleaf salad, celery, radish, onions, salad onions, beetroot, mushrooms and Speciality Lettuce including Chinese Leaf.

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;

To risk-assess and, where necessary, improve recruitment and onboarding processes in order to reduce the likelihood of exploitation through third-parties arranging unofficial and hidden recruitment channels.

To increase the likelihood of detecting any situation of such exploitation via a programme of widespread training.

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 Detection - Training Framework

A training programme is in place which focuses on raising awareness among key employees who have regular contact with operational colleagues. The intention of this training is to increase the reporting of potential indicators of exploitation to a central investigations team. Overall, four training modules relating to modern slavery risks are delivered internally.

Training module title	Training outcomes	Targeted recipients
Modern Slavery Awareness	To equip a wide range of colleagues with an understanding of modern slavery, the potential indicators in the workplace, and encourage reporting of potential issues.	Highly people-facing roles such as those managing operational teams, drivers, accommodation managers, representative forums.
Modern Slavery and Exploitation for HR and Managers	Understanding of modern slavery risks in the UK agricultural context as well as relevant G's policies and procedures.	Relevant management and Human Resources employees.
Modern Slavery Site Champions	Providing further information regarding case management and survivor care.	Key individuals selected as leaders on modern slavery issues at each operational site.
Responsible Recruitment	Awareness of the specific exploitation risks relating to recruitment.	Employees engaged in recruitment as a primary or secondary part of their role.

1.2 Detection - Intelligence Management

G's Growers businesses operate a 'yellow flag' system throughout their operations. The premise of this system is that many modern slavery indicators which colleagues spot in the workplace might in isolation seem insignificant. It is through reporting and investigating any such indicators, including those which might not turn out to be connected to a case of exploitation, that patterns can be established.

In addition to awareness training, clear reporting expectations ensure that intelligence is reported quickly, and utilised in the most effective way. This includes case management and investigation processes which are sensitive to the risk of jeopardising victim safety and legal cases.

The 'yellow flag' strategy relies on a high number of reports, and the 'Modern Slavery Site Champions' embedded at each site have proven to be effective in maintaining report quantity and quality. To this end, there has been a continued focus on training Site Champions in 2021-22 which is supported by regular and active communication with Site Champions regarding the importance of intelligence management.

2.1 Case Management – Survivor Care

Practical guidance and support for employers, in particular people services, managers and HR professionals, is provided through our Survivor Care Standards for Business Handbook. This draws on extensive resources and advice relating to the care of victims and summarises them in a way which is specifically aimed at managers and colleagues of survivors of trafficking.

The tool bridges a gap for capable and compassionate managers who are not experts in trafficking, slavery or aware of the complexities of working with extremely vulnerable people. It demonstrates how the advice offered by NGOs regarding victim care can be applied to an employment relationship.

The handbook covers the following topics:

- Understanding and navigating government support.
- Trauma-informed care.
- Designing a recovery plan.
- Sensitivity and empowerment in survivor care management.

In 2021-22, this guidance was used for refresher training on modern slavery.

3.1 Leadership - 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), which now includes enhanced assessment capabilities via the new Self-Assessment Questionnaire and Radar reporting system.

Second and third-party audits are utilised 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.

This statement has been approved by the Board of G's Growers Ltd on 08/09/2022 and signed on its behalf by the Chairman, Rodney Baker-Bates. It will continue to be reviewed annually.



Handwritten signature of Rodney Baker-Bates.