

Modern Slavery & Ethical Trading Statement

Reporting Period 25 April 2020 to 30 April 2021



YOUR FIRST CHOICE PRODUCE PARTNER

Foreword

Our Modern Slavery Statement demonstrates how the Fresca Group of businesses is positively engaged in tackling modern slavery, and how we commit to proactively taking the right actions to protect our employees and mitigate the risks posed by exploiters.



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Organisational structure

Fresca Group Ltd is a privately-owned company with a variety of holdings in the fresh produce industry. The business includes wholly-owned enterprises and a range of joint venture and associate businesses.

Our business

Our companies supply customers with fresh produce. Our customers are located primarily in the UK, and include multiple retailers, processors, foodservice operators, cruise lines, caterers and other fresh produce packers. Our physical operations are primarily based in the United Kingdom, but products are sourced both within the UK and from international suppliers.



Our values

Flexibility

In our way of working, our service and our direction

Resourcefulness

Finding solutions, even in the toughest of times

Excellence

In our products, our people, our facilities and our performance

Sustainability

Working for a greater future, stronger ethics & longer relationships

Character

A group with diversity, passion and personality; with people who care

Ambition

Driving developments for Fresca, for our people and our partners



Our businesses have established structures implemented to tackle worker exploitation and suitable escalation procedures to manage occurrences as they arise.

The escalation structures are supported with appropriately-resourced management teams, communication systems, training provision, due diligence processes and meeting frameworks.

During the last reporting year, an initiative launched by our Communications Team was recognised by SEDEX as an example of 'Best Practice' for worker engagement.

The health, safety and welfare of our staff is our primary objective and we are very proud of the work we do, have done and are committed to doing in the future.

Our supply chain

The route to market for the products we sell is large and complex. Temporary and seasonal labour is a common feature in our supply chain, and one that we have identified as a significant risk for potential ethical issues.

The very broad international nature of our business brings added complexity with considerations such as language, culture, legislation and economics all being significant influences in our supply chain.



Standardisation of approach is being delivered where appropriate and feasible throughout the group, and our close relationships with recognised and respected bodies in the UK and internationally help provide support for upholding expected standards.

Specifically, within our businesses we have completed detailed risk assessments, mapped and risk rated our labour suppliers and ranked them by priority.

Our supply chain is structured with our owned facilities, co-packers and multiple tiers of suppliers. The scale of this supply chain is massive and has been risk assessed and prioritised to enable suitable allocation of resources.

Mitigation actions to reduce but not eliminate risk have been implemented throughout our supply chain in line with our due diligence procedures.

From early 2020, the world entered a period of unprecedented challenges as the Covid-19 pandemic swept across the globe, and this changed the labour market considerably.

As the UK was plunged into lockdown in March 2020, a considerable number of people were either furloughed or made redundant.

Industries such as food production and logistics for the retail sector saw exponential growth as their demand increased, and the availability of labour improved significantly as the market was saturated with people needing to earn a living.

As the season progressed, however, our own worker welfare checks began to identify an increase in welfare issues with people not getting enough work. As the UK faced its second lockdown, a number of workers started to return back to their home countries. By December 2020, with some retail and hospitality workers having returned to work (albeit temporarily), we experienced our first seasonal labour shortage.

The UK had to contend with further challenges – not only were EU workers returning home for Christmas and ahead of an anticipated 3rd lockdown, which would restrict their freedom of travel, some were also returning ahead of the rush of EU workers planning to find work in their home countries due to the upcoming Brexit constraints.

Of the 4.5 million workers with either EU Pre-Settled Status, or EU Settled Status, it's clear a proportion have not stayed in the UK, or returned following a visit home.

By 12th April 2021, every Fresca business that uses seasonal labour had reported shortages of workers. A year into the pandemic, and its impact is still widely felt.

Business policy & practice

We are committed to reducing the risk of slavery and human trafficking within our own business and our supply chains. We recognise that characteristics of modern slavery crimes are hidden and we acknowledge the importance of identifying potential abuse.

The Fresca businesses have a proud track record of ethical practices and we continue to take an industry-leading role to tackle this issue.

Our business was a partner in the creation of this awareness-raising film:

<https://www.youtube.com/watch?v=d9tN6FM28ws>

Modern Slavery is hidden in every city across the UK, in many businesses.
Could you spot the signs?

If your suspicions were raised would you know what to do?
Your choice to act or not to act could have serious consequences.

Do nothing...
Do the wrong thing...
Do the right thing....

We are a pragmatic company with strong ethical values at its core and we are engaging directly in our supply chain with ethical initiatives. Our commitment to purchasing Fairtrade accredited products is one way in which our business can demonstrate these long-established, embedded values.

Fresca Group created this video to help demonstrate the impact of Fairtrade purchasing: <https://vimeo.com/183633876>

Each of our companies has identified its own risks and priorities and is responsible for monitoring and auditing as necessary. We use our group structure to help drive best practice across all our companies. Again, we have been involved in some ground-breaking work, making a real difference.

Despite an unprecedented year of challenges, we have been involved with a number of national initiatives and activities relating to the combatting of modern slavery. To name a few, Fresca Group:

- was the only labour user invited to help develop the Farm Worker Welfare App, alongside The Clewer Initiative.
- supported Lent Films in the making of the Women in Shadows videos, which raises awareness of the impact on female victims in the UK.
- worked with the Wilberforce Institute to deliver new training workshops.
- attended multiple Modern Slavery Intelligence Network (MSIN) meetings with UK retailers and UK Tier One suppliers – Fresca are a fundamental part of the development on this intelligence network.
- have helped with the development of BSI kitemark for ethical best practice.
- BRCGS, with one of our businesses, Primafruit, being the first company in the UK to pass the first stage of BRCGS.
- engaged and supported UK retailers, the UK Government, and other partners working together to improve ethics in the UK and global supply chains, as a 'key partner'.

Where a risk of abuse is identified, a suitable action plan has been agreed and implemented, using respected third parties to monitor and support as appropriate. We are people centric in our approach and ensure we deliver remedy, if possible, in every situation we encounter.

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Reporting Period 25 April 2020 to 30 April 2021

Fresca businesses work closely with their customers on ethical topics and issues. They have been involved in multiple initiatives again this year and we are proud to state that our work has directly affected victims of exploitation and continues to make positive progress. Information is shared freely on request with our customers.

There's no doubt that welfare risks have increased due to both Covid-19 and Brexit. We take a proactive approach in seeking out potential issues, and as a result have successfully remedied a number of issues encountered.

With a supply chain spanning over 54 countries, it is unfortunately inevitable that bad situations will arise in society, and consequently infiltrate the supply chain. We are honest enough to recognise it is there, and although limited in our ability to prevent it, it is within our power to resolve it where it is found – and we do this well.

Our due diligence processes include protocols, policies, governance, audit programmes and procedures to manage our supply chains.

We have processes that improve our capability to;

- *Prevent and prepare for cases of worker exploitation*
- *Pursue those infiltrating our organisation and supply chain*
- *Protection systems in place designed to help protect the most vulnerable*
- *Train our own colleagues and suppliers*
- *Manage incidents*
- *Develop further our KPI measurements and monitor our progress*

A full annual review with the senior leadership team in each Fresca business has been completed for compliance to the Modern Slavery Act 2015. Each business has agreed the strategy for the coming year and the tactics necessary for successful deployment.

There have been further increases in the KPI reviews, and the company can report that of the 74 group metrics, 40 improved and 34 declined. The metrics that have declined have almost uniquely been attributed to the impacts of Covid-19 and Brexit. We have reviewed our training progress and are proud to report our industry leading training has reached the following levels:

SECTOR	NUMBER OF PEOPLE REACHED
General public (talks and presentations)	4951 (+1544 YOY)
Customers and industry	684 (+349 YOY)
Colleagues within Fresca businesses	2259 (+469 YOY)
TOTAL REACH	7894 (+2362 YOY)

Our external networking and leading engagement activity with authorities, government, NGOs, retailers, and our supply chain has also been reviewed.

Furthermore, the effectiveness of intelligence networks has been reviewed as well as our internal scorecards and our performance against last year's strategy.

Fresca Group are members of, and/or work in collaboration with the following organisations:

- *WMASN (West Midlands Anti Slavery Network) – Board Member*
- *FNET (Food Network for Ethical Trade) – Board Member*
- *MSIN (Modern Slavery Intelligence Network) – Member*
- *Hope@Home – Trustee*
- *Supporter of work by Scotland Against Slavery*
- *Supporter of work by the Church of England*
- *Work in collaboration with NCA (National Crime Agency), GLAA (Gangmasters and Labour Abuse Authority), police and local, regional and national government.*

The Independent Anti-Slavery Commission has published a Maturity Framework against which organisations can assess their progress and practice. An assessment for Fresca Group companies within this framework shows compliance to "Leading on Human Rights Innovation" status.

Criteria to meet for compliance at this level are stated as:

- *The Fresca Board and Executive Teams are totally committed to our Modern Slavery and Human Rights efforts, and that we continue to focus on training our own people, highlight potential risks in our supply chain and to raising the profile across our industry.*
- *Using data analytics to identify risk – we have comprehensive systems that have enabled us to see areas of increasing risks and proactively take steps to mitigate them.*
- *Local, national, international intelligence gathering.*
- *Supporting suppliers to develop ethical competencies.*
- *Pioneering new ways of worker engagement using technology – the Farm Workers Welfare App is a great example of this.*
- *Factoring in the true cost of labour.*

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Reporting Period 25 April 2020 to 30 April 2021

Each of the Fresca companies has a nominated lead Ethical Manager. This is coordinated at a group level by the group Compliance Director. Relevant training and professional development opportunities are provided and a company-wide awareness training programme for all colleagues is available and in the process of group-wide deployment.

Where a Fresca Group company uses an employment agency then such contracts are overseen by individuals trained in Gangmasters & Labour Abuse Authority requirements and procedures. There are also regular reviews and audits conducted within the business and supply chain where deemed appropriate.

Our identification of issues and our ability to work with the relevant authorities to resolve them has proven to be highly effective.

New employees within a Fresca Group company are informed of their rights during an induction session. Every person working in a Fresca Group company (whether an employee, agency employee or contractor) is encouraged to use the Fresca Feedback telephone line to report concerns. This service is publicised widely and frequently through the business.



The poster features the Fresca Feedback logo at the top, with the tagline 'LISTENING TO YOU'. It includes a speech bubble stating: 'If you prefer, there's also a Fresca Feedback form on our employee communication app, Grapevine. This can be completed and submitted through your phone once you've installed the app. Search your app store for Fresca Grapevine to download it.' The main text reads: 'Fresca Feedback is our telephone helpline service for employees, agency workers and contractors working on a Fresca site. If you want to tell us about a concern you have then please call and leave a message.' Below this, there are two columns of text. The left column states: 'It could be about the company or your work, or you might want to report a concern about product safety, integrity, quality or legality. We are always interested to hear how our colleagues are being treated so if you are paying for work, being or see anyone being bullied, would like to query working hours, policies or anything else you are concerned about please give us a call. You don't have to give your name in the message, but if you leave your name and contact details too then we can respond to let you know the outcome of your complaint or to ask you for further information. We want to keep Fresca businesses a place where people want to work and where everybody's voice can be heard, so please don't hesitate to use this service. Calls to Fresca Feedback are free from any landline. We promise that we will listen carefully to your concerns, investigate issues where appropriate and feed back to you about the outcome.' The right column contains the text: 'A service for staff' and the contact information: '08000 55 64 99' and 'www.frescagroup.co.uk'.

Our strategy established for 2021/2022 is already underway and we look forward to delivering further improvements for those employed in our business and supply chain.

I the undersigned take responsibility for this statement and represent the board of Fresca Group Ltd for overall responsibility for ethical compliance.

NAME: *Martyn Fletcher*

POSITION IN COMPANY: *Chief Executive*

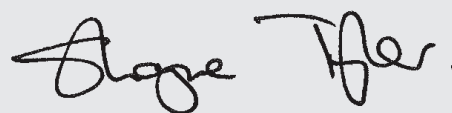
DATE: *1st August 2021*



NAME: *Shayne Tyler*

POSITION IN COMPANY: *Group Compliance Director*

DATE: *1st August 2021*



Questions regarding this statement or requests for further information should be made to:

Shayne Tyler, Group Compliance Director
Email: shayne.tyler@frescagroup.co.uk Tel: +44 (0)1892 831595