

Modern Slavery Statement

52 weeks ending 26th April 2024



Introduction

This modern slavery statement has been created pursuant to Section 54(1) of the UK Modern Slavery Act 2015. It demonstrates how Fresca Group Limited and its subsidiaries (the Fresca Group) are positively engaged in tackling modern slavery and labour exploitation. The health, safety and welfare of our employees is, and always has been, our primary focus and we commit to being proactive in our approach to mitigate risks posed by exploiters.

The International Labour Organisation (ILO) estimates that fifty million people worldwide were living in modern slavery in 2021 - ten million more than in 2016. Human rights risks, including modern slavery and labour exploitation, are prevalent in the fresh produce industry and the Fresca Group acknowledges that our business activities are amongst three of the GLAA's highest risk industries – agriculture; food processing, packaging and production; and warehouse and distribution. Therefore, Fresca recognises the duty we have to conduct the most effective due diligence with the goal of identifying and mitigating risks. We recognise this responsibility as both rights-conscious employers and customers. We also use the influence we have with our suppliers to engage with them in improving their business practices and conditions for workers, whilst building long-standing relationships and partnerships for the future. Fresca understands that work on this topic is an ongoing process and therefore we strive for continual improvement year on year.

Our Story

The Fresca Group’s roots trace back over 150 years ago from 1874, when Matthew Mack opened the first Mack fresh produce stand at Covent Garden Market. Since then, the Mack generations have adapted and grown the business to what it is today. In 2005, Fresca Group Limited was established as the overall holding company for the rapidly expanding group, being the largest privately-owned supplier of fresh produce in the country with more than 45% of our business owned by our own people.

The Fresca Group today is an investor and parent company for a number of subsidiary and joint venture businesses supplying fresh vegetables, salads, and fruit to the UK. Within Fresca are some core group functions such as Finance, Communications and ESG who work with all the Fresca businesses both individually and as a group enabling maximum efficiency and effectiveness.

Employing over 1200 people, we recognise that people are at the heart of everything we do, so supporting their welfare is of paramount importance. Fresca’s motivation for improving ethical standards comes from the very top of the organisation.

Our mission is to be the First Choice Produce Partner. Doing business the right way - ethically and sustainably, for our people, partners, products and planet.

A key benefit of being a group of companies is being resourced to facilitate knowledge sharing and good ethical practices between our businesses, driving further improvements.

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 Business and Supply Chains

Operating Businesses



Importer, packer, ripener and marketer of fresh fruit. Based in Evesham, Worcestershire.



Avocado specialist, importer and marketer. Based in Paddock Wood, Kent.



Experts in the growing & supply of speciality vegetables in the heart of Lincolnshire.



Fresh produce service solutions. Based in Paddock Wood, Kent.



Logistics and customs service for fresh produce, based in Paddock Wood, Kent.



Marketing and commercial rights management of new table grape varieties.



Growing, packing & marketing speciality tomatoes, peppers & cucumbers from a landmark site in Kent, and lettuce in Chichester.



Branches in Birmingham, Bristol and Southampton. Broad customer base, including foodservice, caterers, secondary wholesalers, cruise lines and retail chains.

Joint Ventures



Packing and marketing the highest quality potatoes and vegetables. Based in Lincolnshire.



Marketing the avocado production of the leading Colombian avocado producer, Cartama, across Europe.

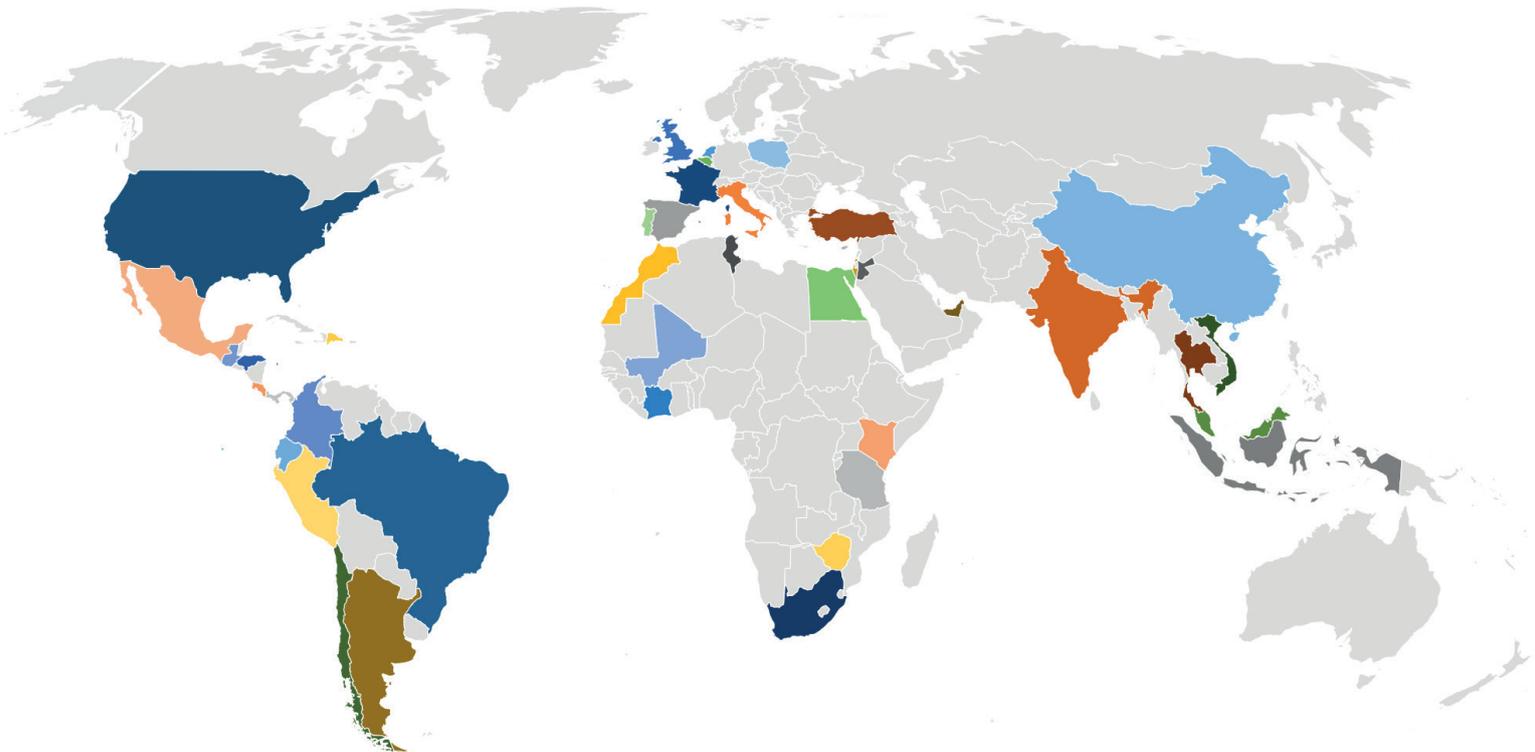


Research and commercialisation of exceptional new plum and interspecific stone fruit varieties from the Zaiger breeding programme in South Africa.

Supply Chains

The supply chains throughout Fresca are large and complex with our suppliers located in 41 countries. We acknowledge that modern slavery and labour exploitation exists, and we are committed to using our network and resources to manage and minimise these risks within our communities. To be successful, we must work to improve visibility and transparency of our multi-tiered supply chains, whilst considering supplier variables such as languages, cultures, legislative regimes, economic environments and approaches to human rights.

Countries We Source From



Our Policies

The Fresca Group of businesses has a number of internal policies to govern processes including, but not limited to, labour provider management, recruitment fees or handling potential cases of exploitation. Included in our extensive list of policies are:

A **Human Rights Policy** committing to respect and promote human rights throughout our businesses.

A **Recruitment and Selection Policy** to ensure effective, ethical and consistent recruitment practices and to ensure all applicants are treated fairly.

A **Code of Conduct Policy** to provide clear guidelines and expectations regarding ethical behaviour and practices within our organization.

An **Equality and Diversity Policy** to ensure equality, diversity and inclusion, and to promote a culture where each employee is treated with respect and dignity.

An **Anti-Harassment and Bullying Policy** committing to provide a work environment free from harassment and bullying.

Grievance and Whistleblowing Policies to provide channels for our people to raise concerns or report allegations anonymously and without repercussion, including an anonymous feedback line and anonymous online form. Worker welfare chats also provide workers with another channel to raise concerns.

In 2024, Fresca undertook a comprehensive review of our ethical management systems across the group to identify opportunities to improve ethical management and deploy group policies.

Our Due Diligence and Risk Management

The Fresca Group due diligence process for our suppliers uses a combination of desktop risk assessments, engagement with suppliers, supplier self-assessment questionnaires, audits and other external factors such as information databases and known industry risk factors. Through these methods, we risk assess our suppliers and deploy the appropriate level of resource and support.

Due to the scale and complexity of our supply chains, we have adopted a continuous improvement approach, focusing our resources towards areas our due diligence determines are higher risk.

Fresca businesses request ethical standards of their suppliers and expect effective implementation of policies and ethical practices to be present within supplying businesses, whilst considering the size and nature of their business. We require all suppliers to commit to our ethical terms of supply, through which we set out minimum welfare criteria for workers, and state that suppliers conduct their own due diligence on their supply chains, with particular focus on risk factors such as labour providers.

To corroborate adherence to these standards, relevant suppliers must have completed their Sedex SAQ to 100% and some suppliers, as determined by our customers, have SMETA audits at regular intervals.

Fresca also sends out an Ethical Questionnaire for produce suppliers. This enables us to ascertain where ethical hazards are present and determine potential risks that need immediate attention. Each year we work on increasing the completion rate with the goal to this becoming a mandatory condition of supply.

Audits

Each of the retailer-serving Fresca businesses undertakes third party ethical audits that align with international standards. First party audits are also carried out internally to continually monitor our standards against the ETI basecode, industry standards, customer requirements and local legislation.

A number of our suppliers also undertake third party ethical audits – this is determined either through risk assessment or our customer requirements. The results from these audits enable us to understand where our suppliers are in their social journey and help to identify where they might need additional support to improve. We will always give them the opportunity to work on areas of non-conformances before taking decisions to move away from the supplier and provide support while they do this. Supplier visits also help to identify any potential unethical practices.

Fresca businesses also conduct second party audits on their service provider suppliers such as labour providers, cleaning companies and security companies.

Our Effectiveness

Much of the success in identifying and mitigating risks of modern slavery and exploitation rely on people. Modern slavery is a hidden crime, and without equipping people with the knowledge to understand red flags, modern slavery across the globe goes unnoticed. Fresca understand that to have any level of impact on combatting modern slavery and exploitation, we must expand knowledge-sharing as wide as possible.

As a network of companies, we can ensure our people are trained on modern slavery and have the confidence to report concerns, and we join forces with others in the industry to become a stronger influence for good.

Fresca prides itself on finding and resolving issues when they arise, our effectiveness is ultimately determined by the management of such issues and how we engage. We have adopted a **4P** approach to demonstrate how we **Pursue** issues, learn from them and both **Prevent** recurrence and **Prepare** our business and supply chain. The culmination of this increases **Protection** for all stakeholders.

Training

Internally, new starters are trained on modern slavery either during their induction or are assigned an e-learning module. Additional in-depth training is given to certain teams or groups of people. For example, all site Human Resources teams have had in-depth human rights and modern slavery training and further training is also being cascaded to procurement and commercial colleagues.

A number of colleagues across the group have also attended Stronger Together – *Tackling Modern Slavery in UK Businesses* training.

On-site, Fresca businesses raise human rights and wellbeing awareness to continually remind our people of the importance of this topic. This is done through posters, noticeboards, the internal colleague communications app 'Grapevine'.

Collaboration and Networks

The current scale of modern slavery and labour exploitation means one organisation cannot tackle the issue alone. Being part of ethical networks and collaborating with other socially responsible businesses within the industry enables the best use of resources as projects can be worked on together, solutions shared, influence heightened, and therefore maximum progress made.

Food Network for Ethical Trade (FNET)

The Food Network for Ethical Trade is a collaborative initiative aiming to use the collective leverage of suppliers and retailers to bring about positive change in working conditions in global food, beverage and horticulture supply chains by providing guidance, resources, training and opportunities for collaboration.

FNET members include major UK food retailers, national and international food and horticulture processors, manufacturers and importers. Fresca attend regular online industry updates and in person FNET events.

Modern Slavery Intelligence Network (MSIN)

MSIN is a pioneering non-profit collaboration in the UK food and agriculture sector created in response to the findings of Operation Fort (the UK's largest ever modern slavery investigation). Information generated by the network is used to detect, prevent and disrupt modern slavery and labour exploitation activity in the industry, protecting workers and improving outcomes for those directly impacted. Fresca were one of the founding members of the Modern Slavery Intelligence Network and continue to pioneer the platform.

Spanish Ethical Trade Forum (SETF)

The Spanish Ethical Trade Forum is a multi-stakeholder collaborative initiative established in 2015 in response to a recognised need to promote better working conditions within the Spanish agri-food sector. The Forum has three Pillars; **1. Meetings**, **2. Capacity Building**, and **3. Working Groups**.

A number of the Fresca Group businesses use suppliers in Spain and therefore Fresca are Associate Members of the Forum. Fresca representatives attend the annual international event, and we actively promote the forums to our Spanish suppliers.

Association of Labour Providers (ALP)

Established in 2004, the Association of Labour Providers promotes responsible recruitment and good practice for organisations that supply essential workers across a number of sectors, including the food industry. The ALP influences government and regulatory policy and provides a wide range of practical and up to date information and services to its members.

As a labour user, Fresca are Associate Members of the ALP and therefore have access to webinars, updates and guidance documents and use these through a labour user lens.

Our Key Achievements



African Based Supplier

In 2019 a number of allegations were made against an African based supplier. This resulted in Fresca jointly commissioning a 3rd party investigation with the supplier, and supported an ETI led improvement initiative. Whilst allegations continued into 2020, Fresca did not hesitate to support this supplier as they demonstrated a genuine commitment to improve. After continued engagement in 2024, Fresca were able to verify the recommendations of international humans rights organisations had been implemented. The results were truly world leading examples and the produce is once again suitable for UK import.

Remedy

Pursuing situations and finding remedies is essential to an effective Welfare programme. Not all situations need to be Modern Slavery to underpin the principles outlined in this statement. For example, in the past year we have found situations where workers have been entitled to repayment of holiday and ensured the suppliers have complied to our standards. We have identified scams where workers have been subject to HMRC abuses perpetrated by criminal enterprises. We have worked closely with authorities to ensure victims are not affected. Elsewhere we have identified examples of Worker substitution, by which workers have attempted to both defraud our businesses and infiltrate our supply chains with illegal workers. We have worked closely with authorities and prevented these attempts from being successful.

Fresca proudly boasts a history of working in this field and has a track record of delivering solutions for all stakeholders. The above examples are just some of the situations that arise.

Supplier videos

We have created a suite of digital training resources for Fresca businesses and our supply chain partners, in both English and Spanish.

Ethical Framework assessments – business preparation is essential to the delivery of the strategic objectives. The introduction of a group wide standardisation framework has been implemented during early 2024 and is underpinning the work we have started in the Social Governance Group.

GroceryAid

“GroceryAid is a charity that provides free and confidential emotional, practical and financial support for those working in the grocery sector.

Fresca have been supporting GroceryAid since 2022, and 2 Fresca colleagues are GroceryAid Network Members. In 2023, we were recognised as a Gold Award winner, achieved when an organisation has demonstrated active participation across three critical pillars - Raising Awareness, Fundraising and Volunteering. This has been achieved through promoting GroceryAid Day, by creating support materials for distribution to colleagues via physical materials as well as through a multi-media approach on intranets, Wellness Hub, our internal communications app ‘Grapevine’, and information screens across the sites. The businesses have also engaged in cake sales and competitions to raise money for GroceryAid. HR teams have been trained on the full suite of services offered by GroceryAid, and can recognise when to signpost colleagues to this important resource.

Our Performance KPI's

Listed below are a number of KPIs we have recorded which form our strategic direction for the coming period.

- **The new average supplier risk score is 470.6 with a range of 265-650 (the higher the score, the lower the risk). We will work with the highest risk suppliers to improve their score and reduce the risk further.**
- 96% of our suppliers have completed the SEDEX Self Assessment Questionnaire. Of those, 96.4% have completed it fully.
- **We have identified that 11% of our high risk suppliers do not have pillars in place for worker engagement. This is something we have targeted for 2024-2025.**
- 87.9% of suppliers asked have a Human Rights policy in place. The aim is to reach 100%
- **36.5% of our suppliers use labour providers and of those 70.4% audit their labour providers. We will work with those who are yet to start.**
- 37.5% of our high risk suppliers provide accommodation to their workers. We are pleased to report that 100% of those suppliers inspect the accommodation. Furthermore, 56.5% of suppliers are providing accommodation free of charge.
- **81% of suppliers have a confidential formal grievance mechanism. We are providing support to the remaining suppliers to help them introduce this vital channel.**
- 61.3% of our high risk UK, Spanish and South African suppliers have attended Stronger Together training and a further 12.1% are planning to do so.

Our strategy established for our reporting year ending April 2025 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 the Fresca Group Limited for overall ethical compliance.

NAME: *Martyn Fletcher*

POSITION IN COMPANY: *Chief Executive Officer*

DATE: *26th September 2024*

