

# Terradace Holdings

## Modern Slavery Statement

Financial Year: 1st October 2023 to 30th September 2024



# CONTENTS

Introduction

Actions Taken

Our Business and Supply Chains

Ethical Trade, Human Rights and Modern Slavery Due Diligence

Assessing and Managing Modern Slavery Risks: Supply Chain

Assessing and Managing Modern Slavery Risks: Our Business

Measuring our Positive Social and Ethical Impacts: Modern Slavery KPIs

Tackling Modern Slavery: Priorities 2024-25

# INTRODUCTION

The Terradace Group of businesses, dps, dps(M&S) and Integrated Service Solutions (ISS), are represented in this modern slavery statement published in accordance with section 54 of the Modern Slavery Act 2015.

dps was founded in 1977 and has been supplying supermarkets for over 40 years, dps(M&S) was founded in 2021 and ISS in 2014.

dps and dps (M&S) responsibly source fresh produce from 46 countries to guarantee the supply of berries, stone fruit, exotic fruit, cherries, kiwi fruit, chestnuts, and salads for shoppers to enjoy year-round.

ISS is our innovative service provider operating primarily in the fresh produce industry, where they inspect, ripen and package a range of fruit and salad products for our customers to supply predominantly UK and ROI retailers.

This statement covers our financial year 1st October 2023 to 30th September 2024.

We acknowledge our responsibilities under the Modern Slavery Act to identify, report on and demonstrate actions taken to reduce and mitigate modern slavery, human trafficking and forced labour posed by exploiters in our own operations and upstream supply chains each financial year.

We remain focused on our strategy and values of operating responsibly to maximise our positive, social and ethical impacts and minimise our environmental footprint. Our commitments include applying the principles and practice of ethical trade to ensure trust, transparency are driving improvements to protect and respect human rights for all.

Over the next year we remain optimistic that plans will enable us to continually evolve our approach, including becoming members and being on the governance committee of the Modern Slavery Intelligence Network, and implementing derisking actions to address the most salient modern slavery risks by country, crop, and vulnerability and driving engagement internally and within our supply chains.

This statement is approved by the Board of Directors



**Paul Beynon** - Group CEO - 28th February 2025

# ACTIONS TAKEN



- ✓ Continued to include strategic pillars for modern slavery, worker voice and grievance mechanisms in our ethical trade and human rights due diligence framework
- ✓ Implemented our new Human rights risk assessment tool including new inherent modern slavery, climate change and gender related indicators.
- ✓ Identified our top 10 sourcing countries with highest inherent modern slavery risks.
- ✓ Maintained Stronger2gether Advanced Business Partner status.
- ✓ Established new KPIs to measure our effectiveness, progress and impacts
- ✓ Hosted supplier webinars on modern slavery awareness and effective grievance mechanisms
- ✓ Created a serious incident & allegation management policy and procedure including modern slavery and remediation.
- ✓ Reduced the number of temporary labour and reliance on agency labour at ISS by increasing the proportion of directly employed colleagues.
- ✓ ISS Increased participation in the internal Engagement and Well Being Surveys, making a positive step change in engagement levels from 68% in 22/23 to 74% in 23/24. dps also increased engagement levels from 88% to 94.32%, while dps(M&S) moved marginally backwards from 88.89% to 85.71%. Participation in retailer engagement surveys continued with good results too.
- ✓ Stronger Together welfare questionnaires were introduced into the ISS induction for employees. Questionnaires are taken in workers own language so workers can answer as honestly as possible and raise any concerns they might have about their welfare and modern slavery. Agency partners have been requested to follow this process which will be audited.



# OUR BUSINESS AND SUPPLY CHAINS



In the UK, we employ a team of 1,257 permanent colleagues across the group. Our business strategy is to responsibly source the best quality fresh produce, through the shortest supply chain for supply to UK retail customers.

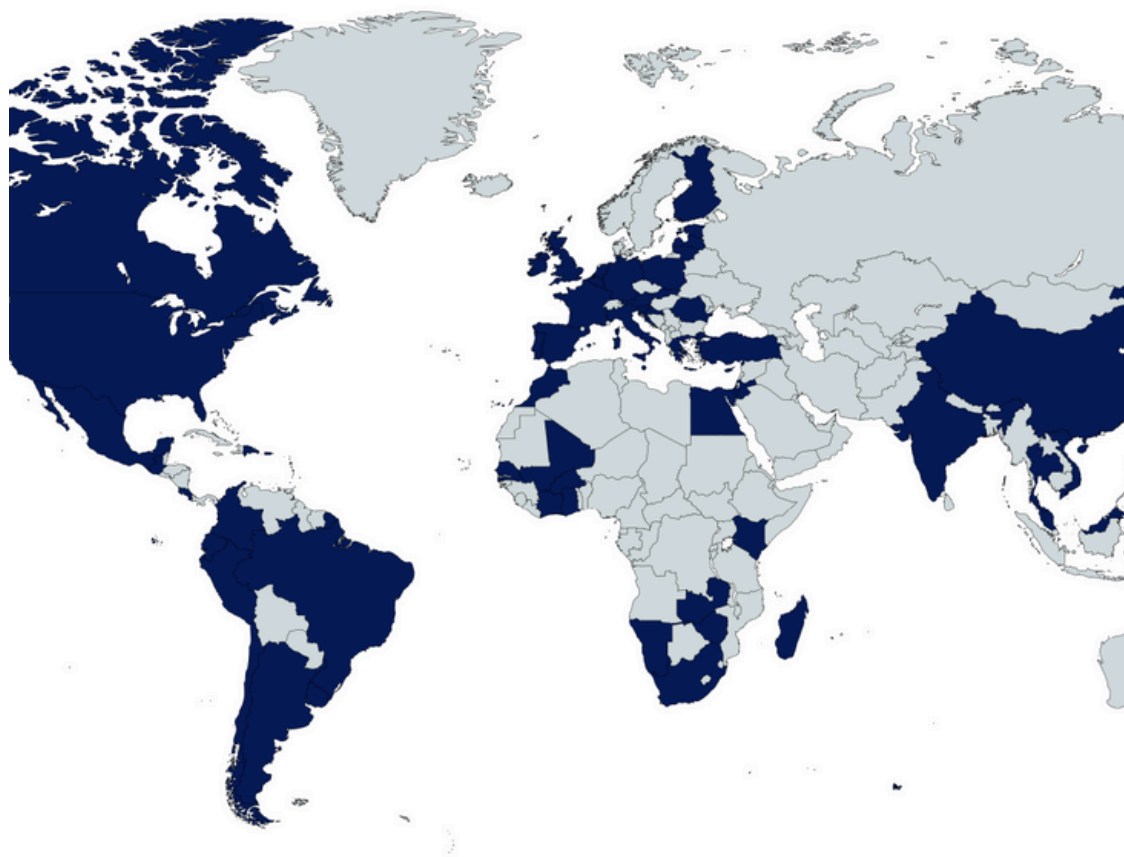
During the 2023– 2024 reporting year fresh produce was sourced from a total of 46 countries, with Europe, South America, South Africa and North Africa as the principal sourcing regions. Across 52 weeks we worked with 278 suppliers and 3650 production operations (grower and packhouse sites).

Using the Food Network for Ethical Trade (FNET) matrix to determine ethical risk by country; 60% (29) of countries sourced from were considered high risk. 40% (111) of all suppliers and 35% (1,273) of all production operations (grower and packhouse sites) were in high-risk countries.

The volume of product packed into finished packaging at source has increased year on year, as such 110 primary packing sites were used with product being delivered direct to customer depots or consolidated in the UK for a short period of storage prior to being sent to the final customer.

ISS our packhouse's supply chain is broadly split into two areas, the supply of people and the supply of ancillary products and services.

## Sourcing Countries



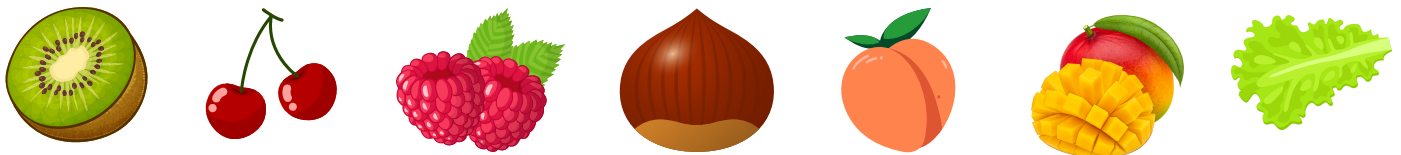
# OUR BUSINESS AND SUPPLY CHAINS



Product sourced and handled by the business falls into 7 product categories:

- Berries
- Ambient salad
- Stone fruit
- Exotic fruit
- Cherries
- Kiwi fruit
- Chestnuts

This is further broken down into 39 product types (including strawberries, blueberries and tomatoes as the most significant by volume).



**STRATEGY AND VALUES**  
TO BE THE FIRST CHOICE PARTNER FOR RESPONSIBLY SOURCED QUALITY FRESH PRODUCE

**dps** **dps M&S**

- FIRST FOR CUSTOMERS**
  - DELIVERING TODAY
  - IMAGINING TOMORROW
- FIRST FOR GROWERS**
  - THE BEST GROWERS
  - STRATEGIC PARTNERSHIPS
- OPERATING RESPONSIBLY**
  - POSITIVE SOCIAL AND ETHICAL IMPACT
  - MINIMISING ENVIRONMENTAL FOOTPRINT
- MARKET LEADING INNOVATION**
  - CREATING CONSUMER VALUE AND IP
  - DELIVERING TOMORROW

Foundational Values:

- DEVELOPING THE BEST PEOPLE
- PASSION
- TRUST AND TRANSPARENCY
- EXPERTISE AND INNOVATION



We do the right thing



We are One Team



We are all Accountable



We believe in Progress



We make a Difference

# ETHICAL TRADE & HUMAN RIGHTS: POLICIES & GOVERNANCE RELATING TO MODERN SLAVERY



Our Ethical Trade and Human Rights policy includes mandatory requirements for suppliers to manage responsible recruitment, complete modern slavery training, implement steps to prevent modern slavery risks, and where relevant provide labour provider and/or scheme operator declarations.

Our policies linked to modern slavery:

- The Responsible Recruitment Policy
- Anti-Harassment and Bullying Policy
- Ethical Trade and Human Rights policy
- Operating Responsibly Policy
- Grievance Policy
- Whistle Blowing Policy
- Recruitment Policy
- Supplier Code of Practice
- Serious Incident and Allegation Management Policy and Procedure.

These policies define compliance with modern slavery risk management procedures and recognise international standards and frameworks, including: the UN Universal Declaration of Human Rights, the International Labour Organization Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the ETI Base Code, the ILO Forced Labour Indicators and UN Global Compact.

## SENIOR TEAM COMMITMENT

The Group Technical Director, Group Head of Responsible Sourcing, Ethical Compliance Manager and the Head of People and Development, evaluate the effectiveness of policies and responsible sourcing practices to identify and manage modern slavery, human Trafficking and forced labour risks.

The wider technical, commercial and human resources teams are responsible for ensuring that relevant policies are upheld and implemented within our business and global supply chains.

## GOVERNANCE

The review and development of modern slavery policies is led by the Group Head of Responsible Sourcing together with the Group Head of People and Development, the Ethical Compliance Manager, and the ISS Managing Director with regular consultation with the Group Technical Director, Group CEO, periodically throughout the year and at least annually.

The Group Head of Responsible Sourcing is accountable for approving supply chain ethical, human rights and modern slavery due diligence requirements.

A dedicated Ethical Compliance Manager is responsible for updating requirements, supplier monitoring compliance, KPIs, investigating serious issues, industry engagement and identifying improvement priorities.

A team of Compliance Coordinators review supplier due diligence, complete risk assessments, ensure primary and high-risk sites audits are booked and support suppliers to close out supplier non-conformances within agreed timescales.

The status of critical non-conformances is reviewed weekly and communicated to customers. Suppliers are supported to develop immediate and sustainable action plans. Serious incidents, allegations, due diligence and compliance is monitored and escalated (where relevant) during weekly meetings, where relevant senior management (board) meetings and assessed during end of season supplier reviews.



# ETHICAL TRADE, HUMAN RIGHTS & MODERN SLAVERY DUE DILIGENCE



We are members of SEDEX, (Supplier Exchange Data Exchange) and regularly update our Self-Assessment Questionnaires (SAQ's) at least annually. ISS undergo regular SMETA social audits (Sedex Members Ethical Trade Audit).

Approved suppliers sign a Code of Practice annually, which includes the Ethical Trade and Human rights policy and specific requirements related to modern slavery risk management practices, responsible recruitment, unannounced third-party audits, and grievance mechanisms. Our Primary and high-risk suppliers are required to be registered on SEDEX and complete an SAQ. Primary supplier sites in high-risk countries, receive third party social audits upon approval and annually thereafter. All secondary packing sites, and growers in high-risk and a number of medium risk countries (based on risk assessment) are third party audited, on a semi-announced basis at least annually.

We monitor and support suppliers to improve working conditions through the following due diligence steps:

- Third party social audits of high and medium risk suppliers and sites
- Supplier visits to assess practices and provide recommendations using our modern slavery checklist & human rights DD checklist and supplier human rights risk assessments.
- Monitoring stronger Together Modern Slavery training
- Advocate for the use and completion of the Stronger Together Progress Reporting Tool.
- Accommodation visits (based on risk)
- Seasonal UK Labour provider declarations
- Promote the use of the [Just Good Work App](#), the [modern slavery helpline](#) and customer whistleblowing policies
- Attendance of the SWS UK Grower Roadshows
- Active participation in and promotion of supplier involvement in collective action groups (customers, seasonal worker scheme (SWS), stronger together, Spanish Ethical Trade Association, Egyptian Ethical Trade Forum and Food Network for Ethical Trade)
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- Supplier Webinars/Engagement to raise awareness

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Strengthening worker voice throughout the supply chain remains an important mechanism to identify modern slavery risks and incidence. In line with the [ETI Base Code](#) and [ILO Declaration on Fundamental Principles and Rights at Work](#); it is a requirement for suppliers to have grievance mechanisms in place and a freely elected worker committee or trade union where there are more than 50 workers.

The ISS HR team audit our labour providers every six months and before any new agency labour providers are considered for supply

The Association of Labour Provider's (ALP) Complyer tool is used to assess labour providers statutory compliance with UK legislation, GLAA Licensing Standards, ETI Base code, Agency Worker Regulations and other general employment and financial legislation.

During the audits, worker interviews take place across a random sample of workers to identify any concerns, poor practices or treatment or any indicators of modern slavery so appropriate action can be taken.

Any actions arising from the audits are recorded and non-conformances have are signed off as satisfactorily closed by the Team. Non-conformances that are not closed in good time or are of a serious nature are escalated to the MD and our legal support if required.





# ASSESSING & MANAGING MODERN SLAVERY RISKS: SUPPLY CHAIN



One of our strategic pillars to enabling and enhancing our approach to assessing and managing modern slavery risks is to foster ethical trade by ensuring supply chain trust and transparency and the respect of human rights.

At the time of reporting, our Group were awaiting final approval to join the Modern Slavery Intelligence Network (MSIN); a UK based non-profit collaboration created in 2020 to increase proactive intelligence sharing across the food, retail and agriculture sector. We intend to update on our progress and participation within MSIN in the next annual statement.

Our Ethical Trade and Human Rights Risk Assessment (ETHRRA) has been updated to incorporate new datasets (Sedex Radar forced labour indicators, gender equality indices, the global modern slavery index and WWF climate indicators) that better provide insight into the inherent modern slavery and forced labour vulnerabilities and risks that exist within our supply chain. The ETHRRA will evolve further in the next year as new risks emerge including vulnerable working groups/types, accommodation and transport and align with customer requirements.

533 grower and packhouse sites have been risk assessed, and we have identified 10 countries with the highest (modern slavery/forced labour) risk scores including Turkey, Egypt, Morocco, Peru, Spain, South Africa, and the UK.

This year we prioritised country action plans and in the forthcoming year we will continue to use the ETHRRA tool to risk assess suppliers to identify priorities for site de-risking action plans.

We will also develop a supplier self-assessment questionnaire to help identify areas for improvement.

Responsible recruitment, the use of seasonal labour and standards of accommodation in the UK continues to be a key risk management area to address. 100% of Tier 1 UK suppliers have now been visited to assess compliance of welfare standards, modern slavery practices and accommodation standards in line with industry guidance.

Key improvements were made in supplier accommodation standards, including the relocation of workers from a supplier's site with substandard conditions; collaboration on the new FPC Temporary Accommodation Guidance document; participation and collaboration with the Seasonal Worker Taskforce (suppliers, customers and labour providers, DEFRA & NGO's) to improve worker welfare within the scheme; encouraging supplier participation in UK based SWS grower roadshows which provide training and best practice guidance for producers; monitoring the outcomes of Home Office GLAA site visits and increased understanding of key gaps as a result of Stronger Together Progress Reporting Tool self-assessments (which are widely completed across the UK supply chain).

Following on from the identification of salient risks within our Ethical Trade & Human Rights Risk Assessment we hosted 2 global supplier engagement Webinars to raise awareness of these risks, discuss guidance to mitigate and share case studies.

- "Effective Employee Engagement and Grievance Mechanisms"
- "Modern Slavery (Forced Labour and Human Trafficking)"

External Presenters included ETI, our Director of Agriculture, Customer Human Rights representatives, Stronger Together, and a Human Rights consultant. Resources from the webinars were shared across the supply chain.

# ASSESSING & MANAGING MODERN SLAVERY RISKS: OUR BUSINESS



We recognise that the challenging global economic and geopolitical situation combined with an imbalance in labour supply and demand in the areas and supply chains in which we operate increases the potential for worker exploitation, modern slavery and people trafficking to satisfy demand. As a trusted supplier partner and tier 1 supply site to UK retailers we understand the need for collaborative working and shared aims to reduce risk and identify and resolve issues that arise with the protection of both people and brand being the primary outcome

Our most salient modern slavery risks are principally related to ISS's supply chain which is broadly split into two areas, the supply of people and the supply of ancillary products and services. To date the former has represented a significantly higher risk of labour exploitation than the latter and has received greater focus due to this. ISS manage this risk by using known, GLAA registered, audited and trusted labour suppliers and actively engage with workers to try and uncover concerns about modern slavery within their network. Most of our temporary workers are already living in the UK and are not sourced directly from overseas.

Our plan to assess and manage modern slavery risks within our marketing operations is supported by equipping our teams responsible for interacting with suppliers and workers with the knowledge and skills to identify signs of modern slavery risks.

We use the Stronger Together frameworks and tools, to support risk assessment and management within our business. dps has maintained the Stronger Together Advanced Business partner status for a fourth year and have increased the Stronger Together Employer Good Practice Implementation tool score from 101 to 104.

The overall percentage score increased from 81% to our target of 90% due mainly to implementing the new Serious Incident and Allegation policy across the group with response and remediation plans. In the medium term our ambition is to achieve Stronger Together Verified Business Partner Status through an independent Organisational Progress Assessment of policies and practices. Having completed the Stronger Together Progress reporting tool in the current period, we have seen a 14% improvement (from 42% to 48%).

In the third year, following the implementation of a confidential whistleblowing system, we have not identified any workplace grievances. We continue to coordinate our company satisfaction survey launched during the last reporting period, providing all people the opportunity to feedback on company practices both online and through facilitated focus groups. Results and actionable improvements are fed back in quarterly company meetings and 'you said, we did' periodic updates to communicate changes to policies as relevant.



# ASSESSING & MANAGING MODERN SLAVERY RISKS: OUR BUSINESS



During this reporting period, we implemented an incident response plan which includes our remediation policy (Serious Incident and Allegation Policy and Procedure) to better enable the business and suppliers to respond to serious incidents and allegations.

We always ensure any Serious incidents and allegations, including Modern Slavery are investigated with a victim centric approach and where appropriate the information is shared within the confines of GDPR and/or reported to the local police and Gangmasters and Labour Abuse Authority (GLAA). We also inform our customers and retailers and work with their ethical and human rights teams to keep them informed and seek additional advice and support if needed.

We plan to share our response plan with our Tier 1 suppliers to help them develop their own response plans. Additionally, we will encourage them to motivate their labour providers to create similar plans.

In the past 12 months, we have identified four allegations containing indicators of modern slavery within our business and 1 within our supply chain . Following investigation of all four allegations of exploitation, none were substantiated.

## TRAINING

Our aim is to raise awareness of modern slavery within our organisation and within our supply chains, providing managers and teams with the knowledge to identify activities and behaviours that may be linked to exploitation. We proactively communicate to our teams as well as providing access to support, resources and tools for both managers and individuals in multiple languages and formats so that they may be confident in reporting concerns or seeking help in their native language and a method that suits them.

100% of new employees complete modern slavery induction training within the first 4 weeks of joining the business including the Stronger Together film subtitled in the native language. The implementation and tracking of training is enhanced using the new company Human Resources portal.

This year Internal colleagues were invited to join our two supplier webinars on Modern Slavery and Effective Employee Engagement and Grievance Mechanisms as part of our ongoing internal training programme, which aims to build understanding at all levels of key modern slavery risks, actions to address them, and practical examples of how to spot the signs. Additionally, 10 more colleagues attended the Stronger Together training on Tackling Modern Slavery in UK businesses during 2023 - 2024, bringing the total number of attendees to 37.

We will extend our internal training program into 2025, incorporating SMETA methodology training to enhance the skills of our wider teams visiting our supply chain, in support of our ethical strategy.



# RAISING MODERN SLAVERY AWARENESS & BUILDING CAPACITY



To expand our knowledge and ability to assess and manage modern slavery risk, we continue to align and work collaboratively with external stakeholders and multi-agency collective action groups, such as The Food Network for Ethical Trade (FNET), Stronger Together, the Seasonal Worker Scheme (SWS) Taskforce and the Spanish and Egyptian Ethical Trade Forums.

Our Ethical Compliance Manager and Group Head of Responsible sourcing are responsible for participation and have been involved in the UK SWS taskforce and FNET Empowering Work and Responsible Recruitment Working groups, focused on effective grievance mechanisms, recruitment fees and remedy and the Climate Risks working group looking at human rights related impacts of climate and the intersection to the migration of people through displacement.

Our new Responsible Sourcing Manager in Peru has been working closely with suppliers across all areas of human rights due diligence, including risk assessment, improving management systems and identifying areas to build capacity and training including modern slavery through onsite visits, collaboration with NGO's and delivering supplier webinars in relation to improving worker welfare. Through a programme of supplier visits, the new Responsible Sourcing Manager engaged with 100% of our PMO's in Peru and 22% of their sites in their first year of appointment. They will continue to engage proactively with these and our newly appointed suppliers on responsible recruitment practices and modern slavery identification, awareness and risks in the coming year, with the aim to visit 20% more sites. They will also continue to feedback intelligence to the business to help inform the long-term strategic priorities.

Within this reporting year we have started two collaborative projects to improve the lives of workers in our supply chain, which are still in progress. Outputs/impact will be reported upon in the next period:

- Empowering women workshops in collaboration with trade unions and customers to provide training to build confidence and capacity among women trade union representatives and worker committee reps. One of the aims of this training is to reduce the vulnerability of women to exploitation, abuse and all forms of harassment and discrimination in recruitment, terms of employment and workplace practices. This project will be rolled out in February 2025 in one county in our supply chain and will expand this to other countries.
- Creation of an accommodation toolkit/guidance in collaboration with customers, NGO's and other UK PMO's to support Moroccan growers to ensure the provision of decent worker accommodation on farms thus positively impacting workers right to housing, health and well-being.

In the coming year we intend to continue to build on collaborative projects and an internal engagement programme through workshops and webinars with the highest risk suppliers/countries and will continue to advocate for supplier participation in Spain, South Africa, and the UK to attend Stronger Together training and workshops.



# MEASURING OUR POSITIVE SOCIAL & ETHICAL IMPACTS: MODERN SLAVERY KPIs



| Area   | 2023 - 2024 Plan/KPIs   | 2023 - 2024 Impact dps   | 2023 - 2024 Impact dps(M&S)   | 2024 - 2025 Plan  |
|--|---|--|---|---|
| Ethical trade, human rights & modern slavery due diligence   | •Use non-conformance data to identify de-risking priorities   | CNC's Morocco 13.5%, Turkey 13% and Peru 72% are 3 de-risking priorities. 409 audits (100%) completed (SMETA and SIZA)   | CNC's Morocco 13.5%, Turkey 13% and Peru 72% are 3 de-risking priorities. high risk country audit 203   | •Use non-conformance data to identify de-risking priorities   |
|  | Number of salient risks (countries and vulnerable people) identified at high risk of Modern Slavery via new HR risk assessment.                         | 4 countries (Colombia, Ivory Coast, Peru, Turkey)  | 4 countries (Colombia, Ivory Coast, Peru, Turkey)   | Number of salient risks (countries and vulnerable people) identified at high risk of Modern Slavery via new HR risk assessment.   |
|  | Number of serious incidents and allegations by reporting channel (i.e. supplier, 3rd party helpline, media, ETI, worker voice programme).               | 10   | 3   | Number of serious incidents and allegations by reporting channel (i.e. supplier, 3rd party helpline, media, ETI, worker voice programme).   |
|  | •Track suppliers that have attended training by country   | Whole supply chain 254 suppliers invited to attend dpr modern slavery awareness webinar and Effective Grievance Mechanisms and Worker Engagement webinars  | Whole supply chain 112 suppliers invited to attend dpr modern slavery awareness webinar and Effective Grievance Mechanisms and Worker Engagement webinars   | •Track suppliers that have attended training by country   |
| Assessing & managing modern slavery risks – our business     | •Increase to 90% by developing incident response plan, remediation approach. Regular MS training for all departments.                                   | •Increase to 90% by developing incident response plan, remediation approach. Regular MS training for all departments. 101 to 104, (81-90%) mainly due to new Serious Incident & Allegation Management policy and remediation policy  | n/a   | •Increase to 95% by developing action plan from the S2G OPA. Regular MS training for all departments. Implement dpr(M&S) Checklist  |
|  | •Maintain & improve working towards Advanced Verified business partner status   | •Achieved. Steps made to apply for verified business partner   | n/a   | •Maintain & improve working towards verified Business Partner for dpr and Business Partner for dpr(M&S)   |
|  | •Implement action plan to improve score by 10% in 2024 - 2025   | 5% improvement (42 - 48%) UK suppliers completed, average 4% increase across all sites.  | n/a   | •Implement action plan to improve score by 5% in 2024 - 2025  |
| Assessing & managing modern slavery risks – our supply chain | •Implement new HR risk assessment to identify country & far crop specific modern slavery risks & develop targeted hot-spot actions.                     | 533  | 533   | •Continue to develop HRR indicators on new risks emerge to identify country & far crop specific modern slavery risks & develop targeted hot-spot actions.   |
| Raising modern slavery awareness & building capacity         | •Use the new HR system to automate training, improve tracking & training validation / refresh dates.  | •100% of new starters have completed induction since 2023.   | •100% of new starters have completed induction since 2023.  | •Continue the new HR system to automate training, improve tracking & training validation / refresh dates.   |
|  | •Reinvigorate Modern Slavery champion roles. Modern Slavery week Oct. 23: UK labour exploitation risks and customer presentations across the dpr Group. | •Group Supplier Modern Slavery Awareness Webinar... engagement Internal Engagement: all sent recording & slides pack Supplier Engagement: 381 PMO's invited 9% engagement, all sent recording & slides pack<br><br>•Group Supplier Webinar - Effective Employee engagement and grievance mechanisms. Internal Engagement: all sent recording & slides pack Supplier Engagement: 254 PMO's invited 14% attended, all sent recording & slides pack<br><br>100% UK Primary suppliers have undertaken Stranger2Gather training in the last 3 years | •Group Supplier Modern Slavery Awareness Webinar and slides Internal Engagement: all sent recording & slides pack Supplier Engagement: 146 PMO's invited 2% attended, all sent recording & slides pack<br><br>•Group Supplier Webinar - Effective Employee engagement and grievance mechanisms. Internal Engagement: all sent recording & slides pack Supplier Engagement: 112 PMO's invited 26% attended, all sent recording & slides pack<br><br>100% UK Primary suppliers have undertaken Stranger2Gather training in the last 3 years | •Reinvigorate Modern Slavery Champion roles with 5 new modern slavery community liaison officers approved to be appointed in the coming year in the packaging sector within our group. Potentially moving to 40 in the long term<br><br>•Continue to host webinars to build capacity within our own business and supply chain and similar enhanced engagement on Group webinars |

# TACKLING MODERN SLAVERY: PRIORITIES 2024 - 25



- ✓ **Governance & KPI Reporting:** Proactively report on new Kpi's identified periodically.
- ✓ **Incident Response Plan and Remediation Policy:** Now our new internal policy and procedure is in place, we will encourage Tier 1 suppliers and their labour providers to adopt similar policies.
- ✓ **Risk assessment/surveys & derisking action plans:** We will continue risk assessing suppliers with the support of a new ethical assessment SAQ work with them to implement action plans including engagement sessions to build capacity and site-specific interventions focused on responsible recruitment practices, management systems, training and processes in place to effectively identify and manage risks.
- ✓ **Multi-agency stakeholder action & engagement:** We will enhance our engagement with customer initiatives and bolster multi-agency collaboration through active participation in FNET, SWS Taskforce working groups, and various NGOs. This ongoing participation will enable us to monitor potential issues more effectively and improve our awareness. Additionally, we will share knowledge and approaches with industry peers and supply chains to develop and implement best practices.
- ✓ **Modern Slavery Intelligence Network:** Finalise the application process to join the UK Modern Slavery intelligence Network and grow our role as a trusted partner.
- ✓ **Modern Slavery Champions/Roles:** Appoint a new HR Compliance Officer specifically focused on Modern Slavery. Develop a network of Community Liaison Officers within our business to enable us to gather more information and intelligence and analyse trends in data, enabling us to act responsibly and swiftly to any concerns of modern slavery in our organisation or labour/ancillary product and services supply chain.
- ✓ **Labour:** Concerns of unlawful employment and exploitation in UK labour supply chain in farming operations and manufacturing sites heavily reliant on migrant labour will remain as a priority in the forthcoming year now focusing on Tier 2 sites.
- ✓ **Stronger Together:** Roll out the Stronger Together Progress Reporting Tool, The Employer Good Practice Implementation tool and Business Partner applications across the Group. Continue training colleagues.
- ✓ **Modern Slavery Awareness Month:** In October there will be lunch and learn activities across all sites for workers and colleagues in multiple languages to raise as much awareness as possible

