



MODERN SLAVERY STATEMENT 2019

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the Argent Foods Limited group's ("Argent Foods" or "Group") activities which continue to support and demonstrate our commitment to mitigate the risks of modern slavery and human trafficking in our businesses and supply chains during the year ending 31st December 2019.

OVERVIEW & STRUCTURE

Argent Foods is a diversified international Group with operations in Europe, Australasia, North America and Africa. We focus on the processing, manufacture, supply and marketing of fresh fruit and produce, meat, poultry, and animal by-products.

As a Group we pride ourselves on being a fair employer to our global workforce, operating in a manner that is respectful of our employees and compliant with relevant legislation. The respect and protection of human rights continues to be a core belief of Argent Foods and as such we do not accept any forms of modern slavery.

KEY AREAS FOR 2019

- Development of a Group human rights policy
- We continued to track and improve on established KPIs
- Fruit suppliers continued to undertake SEDEX Members Ethical Trade Audits
- We continued to support our growers, specifically by identifying their key risk and mitigations in an ethical manual and running UK ethical grower days
- Launched an accommodation guidance training program online in collaboration with the Fresh Produce Consortium

OUR POLICIES FOR MODERN SLAVERY & HUMAN TRAFFICKING

As reported in our previous statements, we have core policies in place relevant to the prevention of Modern Slavery, which are signed off at Board level. This includes our *Preventing Modern Slavery* policy and our *Whistleblowing* policy.

Our *Preventing Modern Slavery* policy sets out the Group's key principles and what is expected from our companies, employees and suppliers to ensure the Group adheres to these principles.

We believe that an open culture is vital to reduce the risk of any exploitation of our people. We encourage all our employees, customers and other partners to report any concerns related to our direct activities or those of our supply chains. This includes any circumstances that may give rise to an enhanced risk of modern slavery.

This is supported by our *Whistleblowing* policy which is designed for stakeholders to make disclosures without fear of retribution. For UK employees, we also have an Employee Assistance Programme which includes confidential helplines staffed with knowledgeable call handlers, who can either offer support on the phone, or direct employees to the appropriate support.

We continually review all of our business and people policies to further cement our commitment in this area, making our stance, processes and support clear and visible to all stakeholders. This is demonstrated in our development of our *Human Rights* policy in 2019. The policy outlines the Group's commitment to respecting all international recognised human rights as relevant to our operations and the actions it takes to do so.

RISKS & MITIGATION

Argent Foods established a Group wide Strategic Steering Group ("SSG") in order to identify the Group's modern slavery risks, in both our own businesses and our supply chain, and the actions that need to be taken in order to mitigate these risks.

The Subject Matter Expert Groups ("SME"), which were established at each subsidiary, focused on understanding their own risks within their business and supply chain.

We concluded that the business risks were reasonably consistent across the Group. As such, the following policies and procedures have been implemented at all subsidiaries:

- Training for employees through external consultants or e-learning
- Raising awareness through posters, newsletters and staff meetings
- Inclusion of modern slavery information or internal e-learning training within induction
- Development of relationships with external industry, national and global bodies such as Stronger Together, GLAA, ALP, Food Network for Ethical Trade, Coop and Bright Futures and the Produce Ethical Network
- Requirement for any UK employment agencies that we source from to be registered and certified with the GLAA and have a demonstrable commitment to mitigating the risks of modern slavery.
- We regularly review labour providers

Supply chains

Due to the size and global reach of the Group there is an inherent risk of modern slavery within our supply chain. In order to mitigate this the SSG has implemented the following procedures at all subsidiaries:

- *Due diligence of the supply chain:* prior to engaging a new supplier we evaluate their ethical principles and seek assurances regarding their commitments to protecting human rights through the use of supplier Self-Assessment Questionnaires (SAQs) and information databases, such as SEDEX.
- *Training:* in depth training is provided to employees who work directly with the suppliers

The Group has identified that the key risk areas in the supply chain are our global suppliers growing operations. As such, the following further procedures have been implemented within our fruit suppliers growing operations:

- *Supplier audits:* in 2018 and 2019 our growers undertook both SEDEX Members Ethical Trade Audits and internal audits. We have also worked with suppliers to develop an audit process that they can use to review their labour providers
- *UK BerryWorld Grower Ethical forum:* this allows suppliers to collaborate, raise awareness of modern slavery and other ethical related issues as well as discuss challenges, concerns and best practice in a confidential space. BerryWorld organised and led two UK ethical grower days in 2019 covering responsible recruitment, Employer Pays principle and managing a multi-language toolkit.
- *Emerging Leaders training programme:* we encouraged our growers to undertake the programme which aims to empower employees, developing their skills and knowledge

2019 Collaborations

During the year the Group collaborated with various bodies in our efforts to combat modern slavery.

- We have previously collaborated with Stronger Together UK, which we have now expanded to Stronger Together South Africa
- Partnered up with &Wider to conduct a workplace communication project on farms. The project aimed to identify weaknesses and development plans
- Collaborated with MIND to train growers on mental health
- Collaborated with FPC to develop the FPC ONLINE Accommodation guidance training program

EFFECTIVENESS

Argent Foods developed key performance indicators (KPIs) to monitor the effectiveness of subsidiaries and highlight any areas that need greater focus. These KPIs include:

- Score achieved on Stronger Together implementation checklist, which covers:
 - Management systems
 - Training
 - Labour sourcing
 - Recruitment
 - Work records
 - Workplace monitoring
 - Worker engagement
 - Access to remedy
 - Percentage of suppliers who have completed a SEDEX assessment

NEXT STEPS FOR 2020

- Focused modern slavery training for Directors and Procurement, specific to their roles
- Review and monitor KPIs developed for our grower base
- Look into becoming a Stronger Together business partner
- Establish links with a charity which can help the Group better understand how to support potential modern slavery victims and to offer employment to survivors of modern slavery

This statement was approved by the Board of directors on 11 June 2020, who will review and update it annually.

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David Gray
Group CEO

A black ink signature with a complex, scribbled appearance, featuring several sharp peaks and a wavy base.

Aggie Mutuma
Group People Director

This statement also applies to all of our subsidiary companies, the main trading entities are listed below.

BerryWorld Group Limited
BerryWorld Limited
Fairfax Meadow Europe Limited
OrchardWorld Limited
Norton Folgate Limited
Poupart Limited
Tendercut Meats Limited
Belwood Foods Limited