

## Modern Slavery Statement

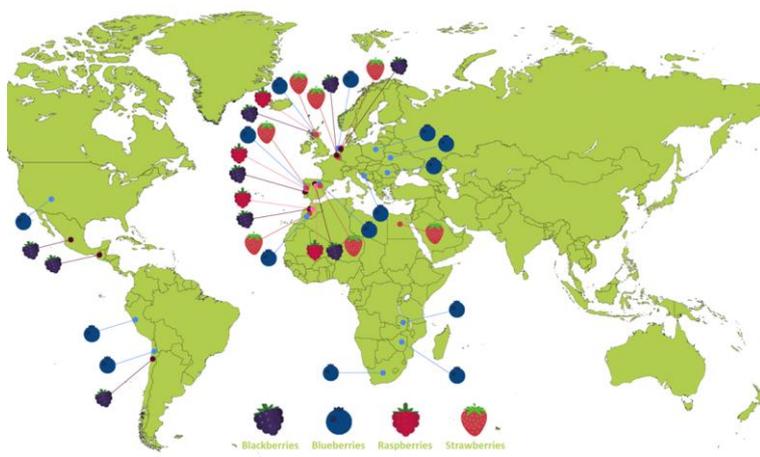
Published in accordance with section 54(1) of the Modern Slavery Act 2015. Our statement outlines the steps that we have taken during 2021/22 towards implementing our zero tolerance approach to slavery and human trafficking.

### Our business and supply chains

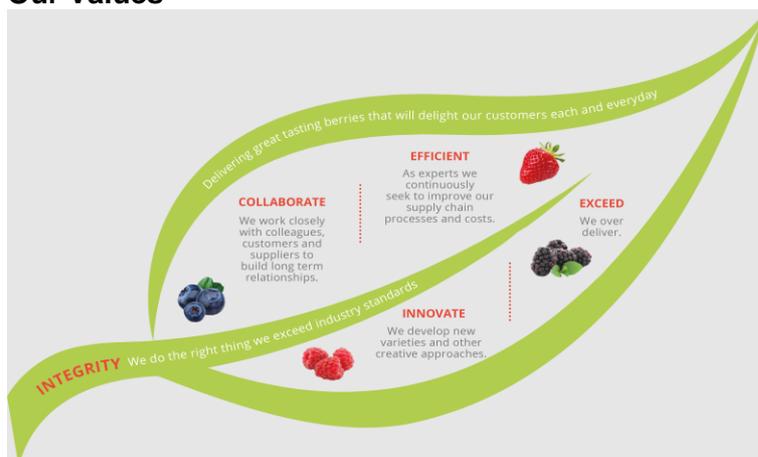
Angus Soft Fruits is a leading supplier of berries to UK and European retailers, food services and wholesalers. We breed, grow, source from around the world and pack berries to ensure consistent supply of the best tasting fruit for our customers.

Our group has a turnover of over £200million, employs over 200 people and currently operates in the UK, Netherlands, Spain, Morocco and Chile.

We work with more than 100 suppliers in 16 different countries in Europe, Africa and North and South America. Our supply chain varies from single tier to more complex multi-tiered suppliers.



### Our Values



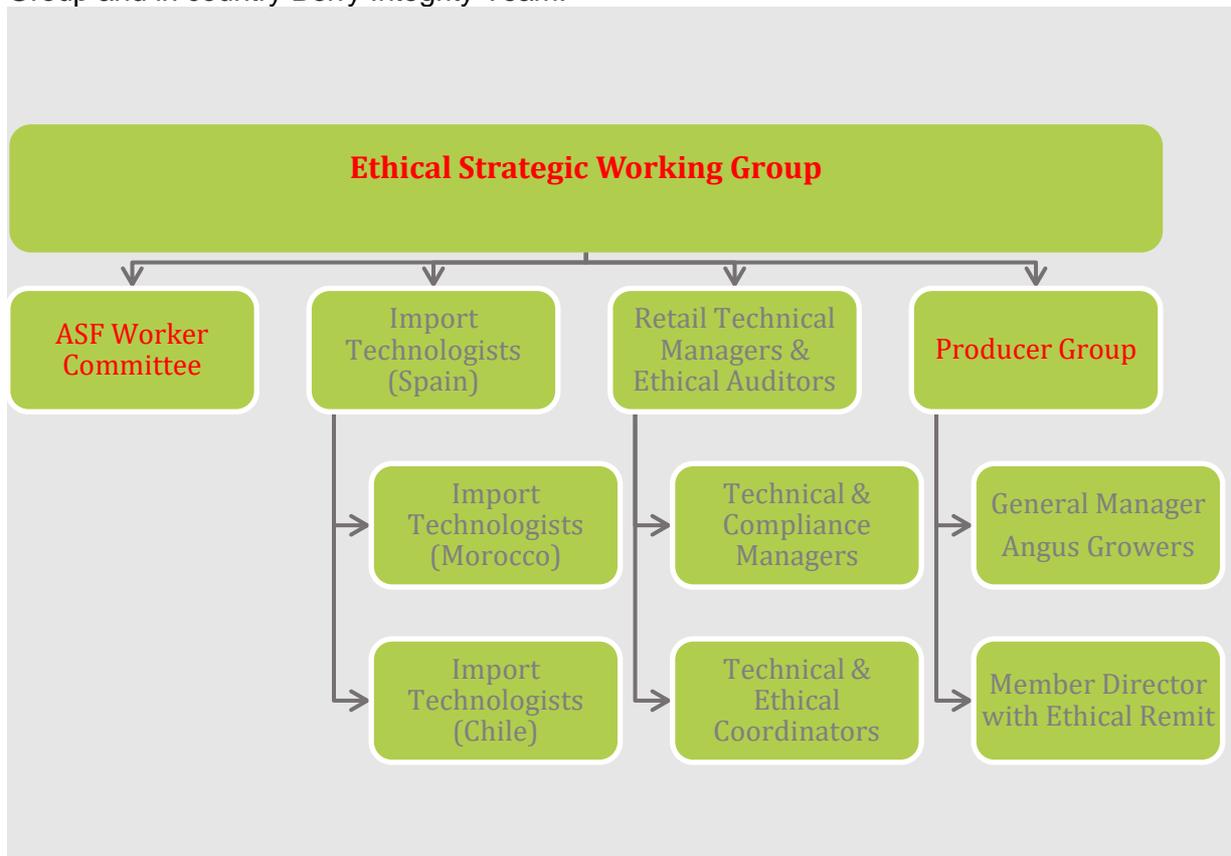
Our values underpin everything we do.



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Accountability for addressing human rights risks, including modern slavery and human trafficking, within the Angus Soft Fruits group and our supply chain lies with our Treasurer and Company Secretary.

Our HR and Ethical Manager is responsible for developing and overseeing the implementation of our ethical trade and human rights strategy supported by our Ethical Strategic Working Group and in country Berry Integrity Team.



### Our policies on slavery and human trafficking

We actively promote and respect human rights within our business through a number of policies, procedures and processes. These include:

- Acceptable Workplace Behaviour
- Anti-bribery and Corruption
- Ethical Trade and Human Rights
- Equality and Diversity
- Grievance
- Labour Provider Service Level Agreement
- Modern Slavery Response Procedure
- Preventing and Managing Risks of Hidden Labour Exploitation
- Recruitment and Selection, particularly our eligibility to work process which ensures that every employee has a legal right to work in the UK and mitigates against the risk of human trafficking



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- Responsible Recruitment Policy
- Whistleblowing

Our Ethical Trade and Human Rights policy, reviewed on an annual basis, is based on the principles of the ILO, (International Labour Organisation) and ETI, (Ethical Trade Initiative) Base Code. Policies and processes reflect our commitment to mitigating human rights risks and remediation of any adverse impacts that our business has caused or contributed to. We conduct our business in an ethical manner that focuses on human rights related to the provision of labour and working conditions throughout our supply chain, ensuring that people are treated fairly and that their human rights are protected and respected. This includes rights to fair pay, safe working conditions and protection from modern slavery. We seek to develop long term relationships with those businesses that share our ethical standards and are dedicated to working within the remit of this policy.

### **Due Diligence**

We require all our fruit growers, and encourage our other suppliers, to be members of SEDEX, (the Supplier Ethical Data Exchange), maintain their SAQ, (Self-Assessment Questionnaire), and to undertake an ethical audit based on risk, ideally a SMETA audit within an agreed timeframe by an approved third party auditor.

Incorporated into our initiatives to identify and address risks of modern slavery are systems that:

- Develop, implement and train out relevant policies and procedures;
- Improve recruitment and onboarding processes within our own business to reduce the risk of third parties engaged in exploitation infiltrating our business;
- Improve awareness and understanding of modern slavery to enable identification of any modern slavery cases;
- Embed worker voice channels;
- Enable an effective response to any suspected cases to protect victims;
- Improve auditing, identification and mitigation of risk amongst our labour providers, including agency worker interviews;
- Regular review of our human rights due diligence risk assessment to better identify and manage risks of modern slavery in our supply chain;
- Identify and assess Base Code non-conformances through audit of labour providers and interviewing workers in our supply chain, including incorporating the anonymous & Wilder direct reporting tool amongst our own workforce and that of our suppliers;
- Mitigate the risk of slavery, human trafficking and other Base Code non-conformances by working with suppliers on CAPs, (corrective action plans);
- Monitor potential risk areas in our supply chain through dialogue with our suppliers to understand the root causes and agree a course of action to resolve them; development and accessibility to bespoke learning interventions, the use of CAPs and follow up visits;
- Protect whistleblowers.

### **Monitoring and Reporting**

Our strategic steering group is reviewed to ensure fitness for purpose in driving our progress against ethical trading KPIs and our ethical trade objectives. We are completing the Stronger



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Together direct reporting tool on an annual basis to also measure our progress against our ethical trading action plan, assess our human rights due diligence approach and benchmark ourselves against our peers.

Despite the restrictions imposed by the continuing COVID-19 pandemic we have made positive progress during 2021/22, particularly in the area of “*Ensuring Appropriate Remedy for Victims of Modern Slavery*”. We are now recognised as a Stronger Together Business Partner Advanced

We are proactive members of relevant forums such as and FNET, (Food Network for Ethical Trade) and our HR and Ethical Manager has been invited to lead a steering group focused on worker representation. We are also sponsors of the Spanish Ethical Forum, in which all of our Spanish suppliers participate.

Dedicated to building long term supplier relationships, we seek to influence commitment to ethical trading practices and increase transparency in our supply chain.

### Training

To maintain awareness and help us to prevent modern slavery or any human rights abuse, our employees have completed various learning interventions such as

- Stronger Together ‘Tackling Modern Slavery in UK Businesses’
- Stronger Together ‘Advanced Tackling Modern Slavery in UK Businesses’
- Stronger Together ‘Investigative Interviewing Skills’
- Responsible Recruitment Toolkit ‘Eliminating Worker Paid Recruitment Fees’

We have also developed and delivered bespoke learning resources to meet identified training needs within our business and our international supply chain to build resilience and capacity.

### Further steps

To enhance our approach to tackling modern slavery within our business and our supply chain, we will:

- Continuously improve our policies and practices;
- Publish an annual statement relating to each of the United Nations Guiding Principles Reporting Framework;
- Further develop our training interventions to raise awareness within our business and our supply chain;
- Further develop stakeholder relationships;
- Strive to achieve our ethical trading KPIs outlined in our action plan;
- Continue to map of our supply chain, incorporating our service providers;
- Continue to embed worker voice into our due diligence processes;
- Strive to remove worker paid recruitment fees from our supply chain.

Neil Redford  
Treasurer and Company Secretary

