



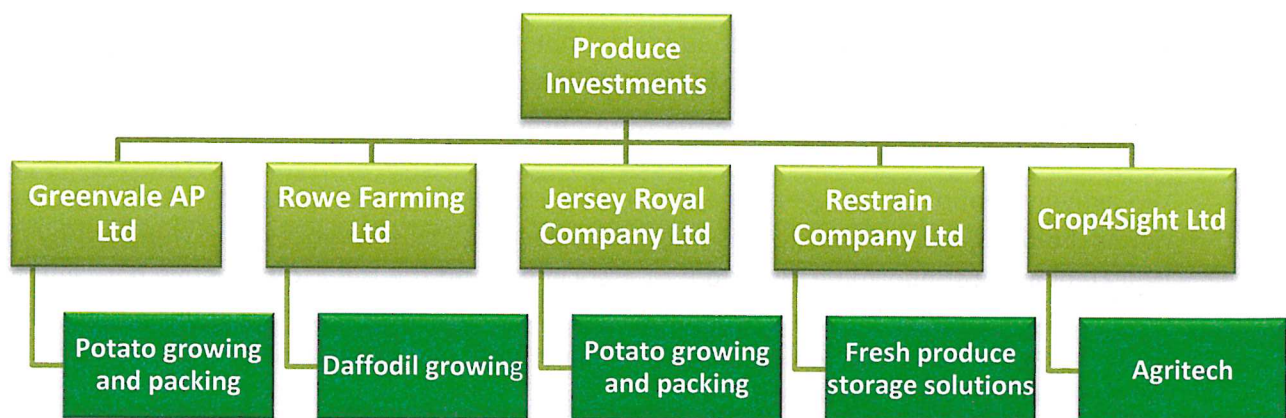
## **Product Investments – Statement on Modern Slavery for Financial Year Ending August 2020**

This is the fifth Produce Investments Modern Slavery Statement which is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Product Investments Ltd (PI) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. PI has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our Business**

PI was established in 2006 and is the parent company of the following organisations within the fresh produce sector, as per the structure below.



PI has a presence in a number of locations throughout the UK and Jersey as well as in France, Germany, Belgium and the Netherlands. The maximum number of employees at any one time is approximately 1,600, with 95% of these being directly employed. PI is committed to both

compliance with the Modern Slavery Act and to the identification and eradication of slavery, servitude and human trafficking as defined by the act. PI is also committed to supporting its suppliers to ensure their practices are legitimate, ethical and in step with the values of the company.

### **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Human Rights policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking does not take place anywhere within our supply chain.

### **Relevant Policies**

In keeping with our commitment to act with integrity in all our business dealings, many of our existing policies ensure that there is no slavery or human trafficking in any part of our supply chain. We have several policies in place relevant to Modern Slavery, all of which are signed off at Director level.

- Employment Policies;
- Discrimination & Harassment Policy;
- Anti-Bribery and Corruption Policy;
- Ethical Trading Policy;
- Human Rights Policy.

Our policies set out the behaviours we expect from employees in the dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisors, governments and competitors. All employees are expected to act with integrity in accordance with the standard of behaviour set out within our relevant policies.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions and the company relevant policies. We encourage employees to raise concerns where breaches of our policies have occurred.

We actively support employee engagement, representation, dialogue and the ability of any employee or agency worker to raise potential concerns or grievances, as evidenced by our Whistleblowing support line. Freedom of association and the right to collective bargaining is a core labour standard that we respect as guided by the International Labour Organisation (ILO). We apply our employment practices in line with, and in certain aspects exceeding the requirements of, local legislation.

We are guided by the SA8000 standard to cover a variety of potential issues including child labour, forced labour, health and safety, freedom of association, the right to collective bargaining, discrimination, disciplinary practices, working hours, remuneration, and management systems.

## **Risk Assessment and Due Diligence of Suppliers and Supply Chain**

The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of our policies and procedures as well as the oversight built into our business operations, and the knowledge and skill of our staff. We assess risk based on a number of factors such as geographical risk indices pertaining to human rights (e.g. Global Slavery Index Rating), the level of supply chain control, external governance factors and customer ratings.

We consider that the most significant risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

We undertake due diligence when considering new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include;

- Our raw material suppliers are approved annually through desktop questionnaires. (During 2020, all raw material suppliers completed the new Sedex Self Assessments Questionnaire to 100% and they were encouraged to attend Stronger Together Tackling Modern Slavery in UK Businesses workshops.)
- Mapping the core business supply chain broadly to assess particular products or geographical risk of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risk of each core business new non-raw material supplier. This is achieved by using a third-party company to send out cloud-based desktop audits which are reviewed by qualified social compliance auditors.\*
- Where the desktop audits identify risks, corrective action plans are sent out to our suppliers that are not meeting compliance or our expectations.
- During 2019-20 season, ethical audits by third parties on high-risk raw material suppliers had no non-compliances identified.

However, we recognise the limitations of ethical audits to identify modern slavery issues, and to have effective modern slavery due diligence, we need to undertake a range of other methods, as to the appropriate nature of the supply chain. In the past year our due diligence has included;

- Bespoke due diligence audits to labour providers including Gangmasters & Labour Abuse Authority active checks.
- Greenvale team visits to high-risk supply chains e.g. 2019/20 visits to Egypt and Israel.
- Invoking sanctions against suppliers that fail to improve their performance in-line with an action plan. Serious violations of our policies, lead to termination of our business relationships, where remediation is not considered acceptable.



\*during 2019/20, we achieved the following supplier assessment goals with the target group being our top suppliers;

Assessment Complete	29%
Assessment In Progress	43%
Assessment To Be Undertaken	27%
Supplier Declined Process (delisted)	1%

### **Training and Awareness**

We ensure that we have competency within our organisation, through training relating to human rights and the awareness of the social accountability standard SA8000. We use accredited third-party supplier auditors who are trained social compliance auditors to work and advise our management team and employees.

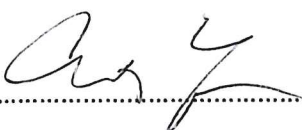
Human rights awareness training has been further directed to personnel who work in human resources. Specific supplier standards training is directed at procurement personnel. More general awareness is available throughout the wider organisation through our relevant policies.

### **Board of Directors Approval**

The PI Group of companies will never knowingly enter into a business relationship with any organisation involved with slavery, servitude or human trafficking. The senior management of the company accepts responsibility for the implementation of any policy in relation to this matter and for the provision of adequate resources to ensure that slavery, servitude or human trafficking is not taking place in the company or its supply chain.

This statement has been approved by the Managing Director (or equivalent) of each PI company and the Chief Executive of Produce Investments.

This statement will be reviewed annually.

Signed.....

**Andy Ferguson - Director**

Date.....