



Modern Slavery & Human Trafficking Statement 2018

Global Growers Limited

(Reference Period 1.1.18 to 31.12.18)

Introduction

This statement has been published in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Global Pacific Food Group's slavery and human trafficking statement for the financial year commencing **1st January 2018** and ending **31st December 2018**. The Act makes provisions about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims. In accordance with the Act, this statement articulates our policies and practices around recognising and preventing human trafficking and slavery in our supply chain.

Our Business Structure & Governance

Global Growers is a subsidiary of the non-UK registered Global Pacific Food Group Limited. Global Growers directly employs staff in the UK. The company specialise in the procurement of fresh produce from around the world for sale in the UK. Our Chairman and the Board of Directors are ultimately responsible for delivering our commitments on tackling modern slavery in our business and our supply chain. They are supported by our Technical departments, who provide updates on compliance and our approach to continuous improvement.

Our Supply Chains

As a group we source fresh produce from approximately 100 Tier 1 suppliers in more than 20 countries and work closely with a British grower to offer local produce when in season. As a result of the Modern Slavery Act, in 2018 we reviewed our approach to managing our Ethical Responsibilities within such a broad supply chain which is managed by our Technical Departments worldwide. Our UK supply chain only includes contracted packers who are responsible for their workforce. Within the total Global Pacific supply chain there are considerably more workers who are not directly employed by us or our suppliers yet work within our supply chain that we are obliged to protect under the new legislation. This is a complex task and therefore one that all tiers within our supply chain must agree to target when entering a supply agreement with Global Pacific.

Our Policies

The cornerstone of our approach towards tackling modern slavery & human trafficking in our supply chain is our Ethical Policy, which all our suppliers sign up to annually. In 2018 the Ethical Policy, Supplier Agreement and Modern Slavery Act Fact Sheets for our staff and our suppliers, have been subject of review and improvement to include a stronger emphasis on Modern Slavery & Human Trafficking and the Prevention of Stowaway's.

Collaborative Action

Modern Slavery is a complex issue and as a result it is vital that we work closely with external stakeholders including NGO's, charities, trade union organisations and our customers where ever possible. We are members of Stronger Together, a UK multi-stakeholder collaboration between supermarkets, industry trade associations, NGO's, individual employers, labour providers and trade union representatives. This initiative seeks to reduce the occurrence of forced labour, labour trafficking and other forms of hidden third-party labour exploitation. We encourage our staff to



contact Stronger Together through the helpline numbers if they have concerns that they or colleagues are victims of Modern Slavery or Human Trafficking.

We require our UK Packers' to ensure their labour providers have a **GLA** licence through monitoring processes' and that they follow the provisions of the Gang master Licencing Act 2004 adhering to their main standards which cover all legal requirements to protect workers from poor treatment and exploitation. They cover issues such as working hours, training, terms and conditions, the national minimum wage and transport to ensure our labour providers meet the basic safety and welfare standards.

During 2018 Global Pacific staff attended and participated in produce industry working groups such as the Spanish Ethical Trade Forum, who meet specifically to discuss issues and share best practice across the produce sector. We continue to commit to attending seminars, conferences and working closely with our customers on this matter.

Due Diligence & Risk Assessment

We are AB members of the Supplier Ethical Data Exchange (SEDEX), a not for profit membership organisation dedicated to driving continuous improvements in responsible and ethical business practices in global supply chains. We use SEDEX to help us assess risk and manage compliance across our Tier 1 supply base who are all required to be members, complete a self-assessment questionnaire (SAQ) which includes indicators of forced labour, and share visibility of this information with us as part of our basic due diligence requirements. As a minimum requirement and a pre-requisite to supply, all suppliers to Global Pacific must register each site of employment and fully complete a SAQ and each site must then be linked to Global Pacific as a direct customer to provide us with transparency of employment sites, their SAQ and any Independent Ethical Audits undertaken. Global Pacific Technical department track the progress of suppliers in maintaining their membership status, completing & updating SAQ's, and closing out of audit non-conformances within the agreed timescales.

Training & Raising Awareness

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through Stronger Together training programmes, commercial & technical managers are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

The Modern Slavery Act Fact Sheet we have produced and shared with all staff and suppliers gives them a simple guide and useful links to SEDEX briefing Notes, and guidance from the Ethical Trade Initiative (ETI). New employees to our Commercial and Technical Team are briefed on Modern Slavery as part of their development program. This briefing includes reading of the literature already mentioned, an introduction to our risk assessment and due diligence processes, so they understand from the start of their career with Global Pacific that Modern Slavery and Human Trafficking is an issue we take seriously and will not tolerate in our supply chains. This is extremely important in driving a culture of intolerance through all departments associated with the procurement and assurances of our supply chains from the moment new colleagues join.

Victim Support

If a case of exploitation is suspected or exposed within our supply chain, we will work closely with our suppliers and third parties to help them manage the situation so as not to endanger the victim or any



future criminal case. We will take guidance from the UK Government and organisations such as Stronger Together on appropriate remediation practices.

Performance Measurement

In 2018 there were no reported incidents of Modern Slavery or Human Trafficking in the Global Pacific supply chain. We have also completed the Stronger Together Progress Reporting Tool (PRT) which gives further transparency to Global Pacific’s commitment to tackling modern slavery.

Next Steps

In 2019 we plan to continue to promote the awareness and diligence of our staff and suppliers whilst monitoring compliance in our supply chains. We also commit to updating the Stronger Together PRT to demonstrate continuous improvement in our systems.

This Statement has been approved by the Board on 31 May 2019 and signed on its behalf by:

Chief Executive: Jonathan Tremayne

Signature:

Date: 31st May/2019