



**AGROBERRIES MODERN SLAVERY STATEMENT**  
**FY 2024**



**BERRYWORLD LTD / POUPART IMPORTS LTD**

## Introduction from the Board

This statement is issued in accordance with the Modern Slavery Act 2015, and it details the actions we take as a group of businesses to mitigate the risks of forced labour within our own operations and our supply chains. We are proud to be able to share our hard work against modern slavery, recognising that transparency, collaboration and openness are key in tackling this widespread challenge.

In September 2024, Agroberries Limited -a global fresh berry business- acquired the BerryWorld Group, including Poupart Imports Ltd. Following this acquisition, Agroberries Limited established a group-wide policy on modern slavery, extending its scope to include all relevant UK entities within the group. Prior to this, responsibility for this modern slavery statement rested with Argent Foods Limited, the former parent company of BerryWorld and Poupart Imports.

- While Agroberries Limited itself does not meet the reporting threshold under the UK Modern Slavery Act, it is now the parent company of the BerryWorld Group in the UK. Accordingly, this statement is being made pursuant to the Act on behalf of the following UK-based business units within the Agroberries group that do meet the reporting requirements: **Poupart Imports Ltd**
- **BerryWorld Ltd** which includes:
  - BerryWorld UK (soft fruit marketing)
  - BerryWorld Varieties (plant supply)
  - BerryWorld Ltd T/A PrepWorld (ready-to-eat processing)

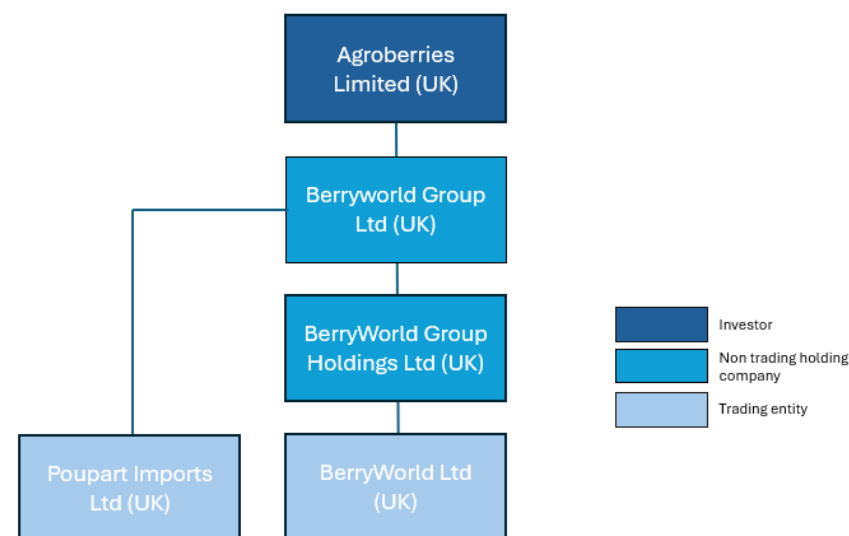


Figure 1. Corporate company structure.

This group-wide approach reflects Agroberries' commitment to upholding ethical standards across its global operations and throughout its supply chain.

At Agroberries, we are committed to operating in a transparent and responsible manner, striving to attain the highest ethical standards and respect for human rights. This includes reducing the risks of modern slavery throughout our business and our supply chain. We want everyone who works for us or within our supply chain to be treated well and be free from the risks of modern slavery. We pride ourselves on being a fair employer consistently operating in a manner which is respectful of all our employees and compliant with legislation.

Agroberries are on a mission to shift our world towards fair food systems that respect people and our planet, and we aim to treat everyone fairly and with respect. We understand our responsibility under the UNGPs to prevent, mitigate and remediate any violations of human rights both within our own operations and within our supply chains, and we take this responsibility incredibly seriously.

Modern slavery is a growing issue, that unfortunately remains a salient risk within fresh produce. The seasonal nature of our products and transitory nature of the workforce creates unique vulnerabilities, all of which make it easier for exploitation to occur, such as excessive working hours, withheld wages, poor living accommodation and forced labour. With operations and growers both in the UK and overseas, the contextual challenges and risks we face are diverse, and having a risk-based approach, rooted in collaboration, capacity building and empowerment is a core part of our strategy.

We are a brand dedicated and focused on the production of fresh and prepared produce, and we acknowledge that this is often recognised as a higher-risk product category by our UK customers. Alongside the risks inherent in fresh produce as mentioned previously, there are additional known risks specific to berries, with the use of seasonal labour, often migrant,

creating a vulnerable workforce. We are keenly aware of our responsibility as a supplier of these products and aim to ensure that our strategies and actions take into account the unique salient challenges for our business.

As a part of our mission, we aim to ensure that all workers within our supply chains, right down to the passionate pickers on our farms, are treated with respect and dignity. Fundamentally, we want to ensure proper working

conditions at every stage of our supply, to enable a workspace that treats

workers fairly and equally. The risk of modern slavery, forced labour, and labour exploitation is ever present within agricultural supply chains, and so we collaborate closely with our global colleagues, growers and collaborative networks and initiatives to help mitigate and prevent these risks. Prevention of Modern Slavery is a core part of our Responsible Sourcing and Ethical commitments.

## Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31st December 2024. This statement has been approved by the board of directors, who will review and update it annually.

Signed by: Jorge Varela

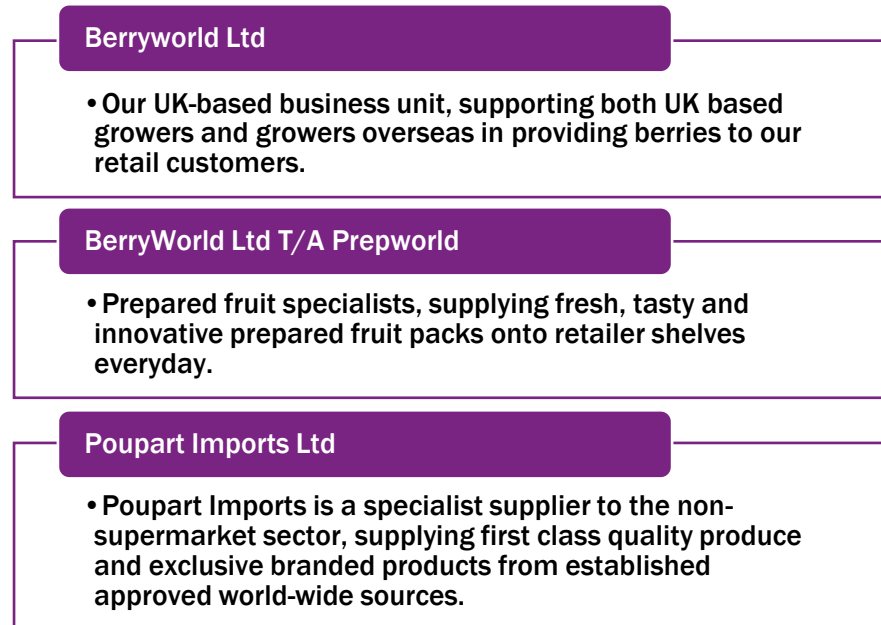
Dated: June 23<sup>rd</sup>, 2025

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## The Berryworld Ltd Business

### Our Organisational Structure



We recognise that a common feature within our shared supply chain across our business is the employment of temporary and agency labour due to our seasonal crop profiles. With this poses many challenges including language, legislation, cultural and economic considerations. Wherever possible we work

together to collaborate on and address these challenges, collectively supporting suppliers and workers. This communication across our global operations enables us to get closer to growers and workers at source, whilst also facilitating knowledge and resource sharing.

### Governance

We have dedicated resources and staff members who address the risks of labour exploitation and modern slavery within their roles, who report into the Managing Directors for each respective business unit. This is conducted through a combination of risk assessments, policy implementation, human rights due diligence, training and collaboration.

Responsibility for identifying, assessing and remediating modern slavery sits within each business unit, overseen by the respective Managing Directors/divisional CEOs. Overall accountability for our Modern Slavery Statement is held by the Agroberries CEO.

The information for our Modern Slavery Statement has been gathered from a variety of sources, including: our internal supply chain mapping and monitoring process, collaboration with our global business units, collaboration with our growers, SEDEX data and reporting and Stronger Together.

### Our Supply Chain

Agroberries holds as one of its core values, that people within its supply chains are treated fairly and equally, without fear of harassment or exploitation. Promoting decent working conditions is a key part of our strategy to act in a socially responsible manner. Agroberries recognises the responsibility that it shares with its suppliers to operate ethically. We also recognise the importance of transparency on our supply chains, policies and practices in relation to our work on preventing forced labour and labour. At Agroberries, we procure and grow a range of fresh produce all year round from various countries. We either purchase directly from the growers, or work with intermediaries along the supply chain.

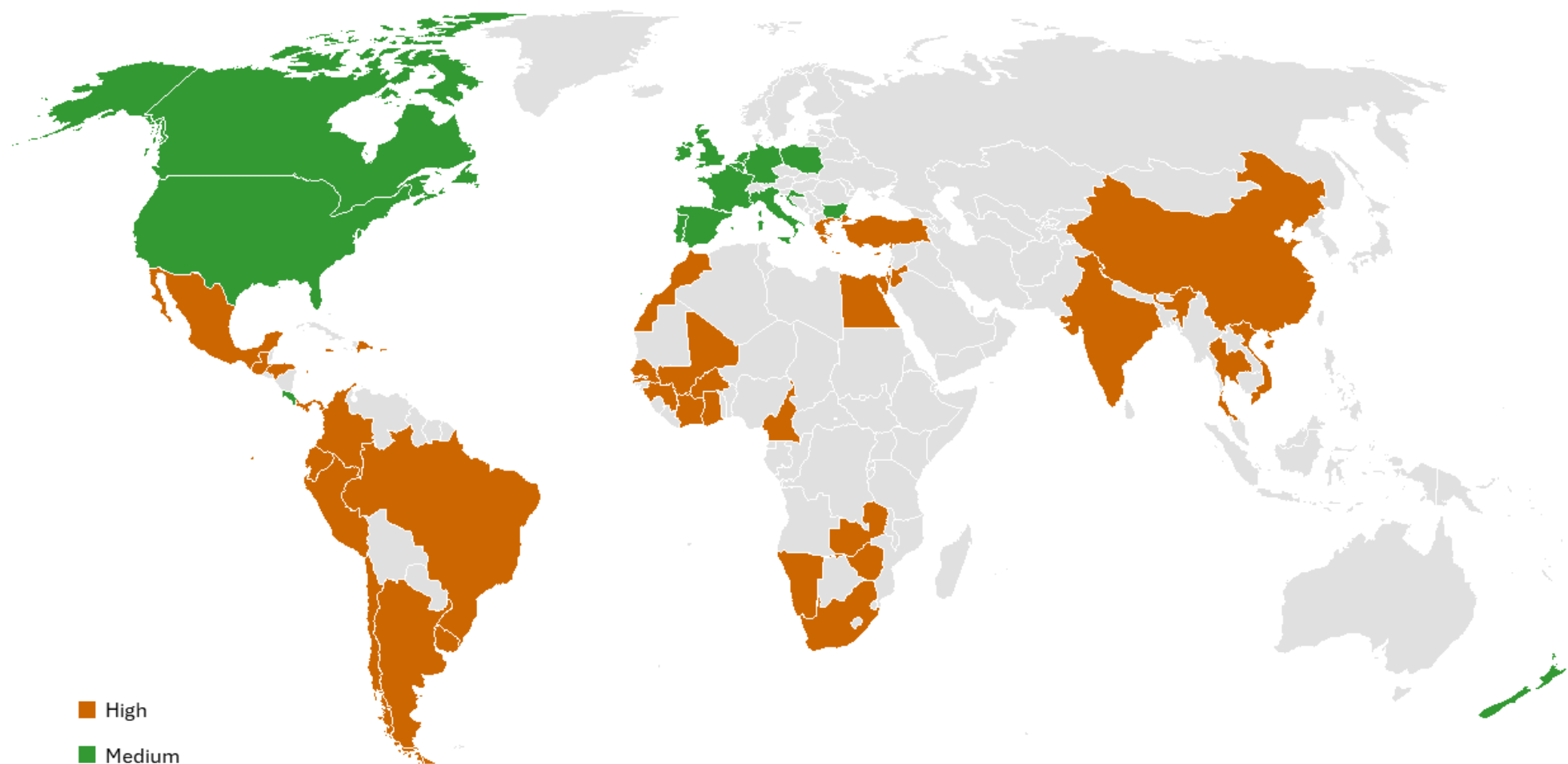


Figure 2. The combined supply chain of Agroberries Limited, including the human rights risk per country, as according to the SEDEX risk assessment tool.

In this reporting period, we collectively sourced from 56 different countries, of which 71% were rated as high-risk according to SEDEX. Some of our key sourcing countries include South Africa, Spain, the United Kingdom and Peru, where we operate our own offices and manage long-term relationships with our suppliers.



## Policies and Procedures

Our approach to responsible sourcing is rooted in our policies and principles of promoting decent working conditions and ensuring workers within our supply chains are treated fairly and equally, without fear of harassment or exploitation. This encompasses international labour rights and standards, including the ETI Base Code, International Labour Organisation Standards and the Universal Declaration of Human Rights. We are informed by the UN Guiding Principles on Business and Human rights in how we implement our ethical strategy and policies.

Our strategy in all areas of our business is based on three key pillars:



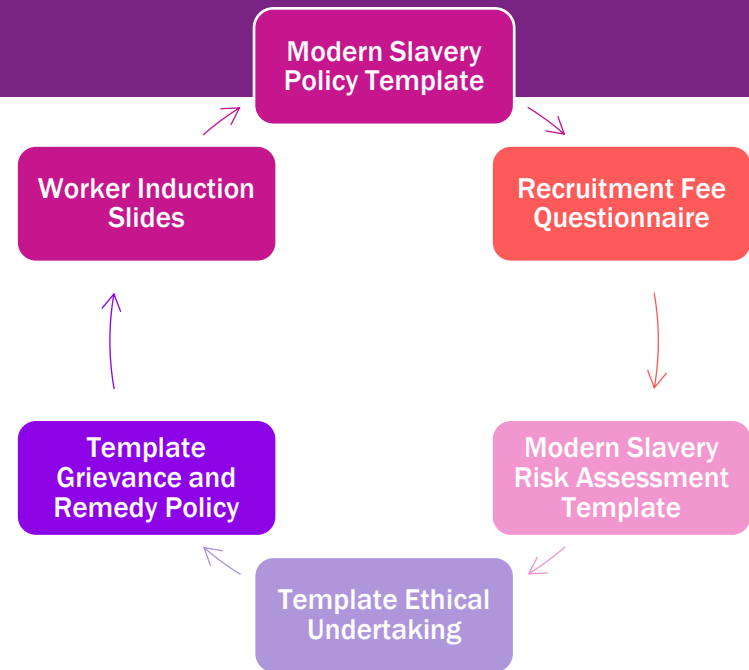
We review our policies on an annual basis to ensure that they are up-to-date and contain all of the latest information and developments within our business and the wider industry. Policies are communicated to suppliers through a variety of methods, however for our programmed suppliers all policies, procedures and resources are shared on an online due-diligence platforms or via email communication.

Each business has staff responsible for policy implementation within the supply chain, and they also review and assesses supplier policies through SEDEX SAQs, risk assessments and third-party ethical audits.

## GROWER SUPPORT

Our dedicated growers follow our policies and procedures, however we also support them in creating their own! Grower capacity building and support is a crucial part of our human rights strategy, as our growers are the ones tackling the risks and challenges head on!

All of our policies are available as templates for growers to use in crafting their own, and we also support them in the use of various procedures, assessments and tools. This allows them to develop a greater level of maturity in their management systems, better preparing them to manage human rights risks.



Suppliers also have access to a range of resources and guidance materials to support on their policy implementation and development.

## Our Colleagues

As a business, we have implemented several policies to support our colleagues in multiple areas, including protection of their human rights. Some of these policies include:

Policy	Description
Policy on Preventing Modern Slavery	Our policy commitment to preventing and recognising modern slavery within our supply chains. This policy draws on from ILO Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, 1 and the UN Guiding Principles on Business and Human Rights.
Whistleblowing Policy & Speak Up Hotline	Policy containing details on our independent 'Speak Up' whistleblowing line, managed by Navex Global. Individuals can use the hotline to alert us of anything illegal or unethical, including potential forced labour or labour exploitation. The hotline has been recently rolled out to our suppliers in Jordan and Egypt.
Sexual Harassment Policy	Our policy detailing our approach in line with the Worker Protection (Amendment of Equality Act 2010) Act 2023. This policy details people's rights in the workplace and how incidents of harassment can be reported and managed, along with sharing how we can cultivate a supportive environment.
Equality and Dignity at Work Policy	Our commitment to ensuring equal opportunities for all employees, avoiding unlawful discrimination in employment and encouraging diversity amongst our workforce.





## Our Supply Chain

We have implemented several policies which are relevant to modern slavery, which support us in our continuous work within our supply chains. These policies are updated on an annual basis to ensure that any new developments in the industry are captured and replicated within our business and supply chains. Our policies include:

Policy	Description
Responsible Sourcing Ethical Trade Policy	Policy statement on our commitments to human rights and ethical trading. This includes commitment to ILO Standards, the ETI Base Code and GLAA standards. This document also outlines guidance on our due-diligence expectations.
Ethical Undertaking	Signed agreement issued to suppliers to gain their commitment to the ILO standards, ETI and BSCI Codes. This also details our minimum requirements and expectations for suppliers.
Ethical Procurement Policy	Policy detailing our minimum requirements to trade with a site, our customer requirements and the risk ratings of our supply countries, to be used by our procurement teams.
Remedy and Grievance Policy	Our recognition of the need for us to assist in remediation where there have been human rights violations within our supply chain, per business unit. This policy highlights our internal responsibilities and procedures for delivering remediation, along with the principles we commit to in relation to remediation and grievance mechanisms.
Policy on Preventing Modern Slavery	Our policy commitment to preventing and recognising modern slavery within our supply chains. This policy draws on from ILO Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, 1 and the UN Guiding Principles on Business and Human Rights.
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## Identifying and Managing Risks

Our risk assessment process prioritises our raw material production, with the growing and harvesting stages identified as the highest risk process. Through our work in this area, we aim to gain a better insight into the inherent vulnerabilities to modern slavery and labour exploitation within our supply chains. The risk assessment process is overseen by each responsible team, who utilise a variety of sources and processes to complete these assessments, including:

- Mapping and assessment of our raw material supply chains to site level.
- Data from site self-assessment questionnaires.
- Using the SEDEX Risk Assessment Scores.
- Data from third party ethical audits.
- Desk-based research on our sourcing countries.
- Utilisation of industry accessible resources.
- Collaborations with multi-stakeholder initiatives.
- Consultations with growers and workers.
- Consultations with our international business units to review their supply chain risk and mitigations.

In order to identify our salient risks, we use the information from our site risk assessment, in combination with the sources above. Some of our salient risks identified include:

- Modern slavery
- Labour exploitation via labour agencies and third parties
- Unethical Recruitment Practices
- UK Agricultural Seasonal Worker Scheme
- Labour Exploitation in Spain
- Grievance Mechanisms and Remedy
- Worker Voice
- Gender and Menstrual Health

- Water Access & Heat Stress
- Accommodation
- Transportation and Logistics
- Health and Safety

<b>UK</b> Modern slavery, Vulnerable workers, Worker voice	<b>Spain</b> Modern slavery, Vulnerable workers, Accommodation, Worker voice, Gender	<b>Peru</b> H&S, Vulnerable workers, Worker voice Modern slavery,
<b>Zimbabwe</b> Vulnerable individuals, Modern slavery, Gender	<b>Jordan</b> Vulnerable workers Worker voice, Modern slavery, Gender	<b>Italy</b> Vulnerable workers, Worker voice Modern slavery,
<b>Egypt</b> Vulnerable workers, Worker voice, Gender, Modern Slavery	<b>Chile</b> Vulnerable workers, Worker voice, Modern slavery	<b>Poland</b> Modern slavery, Vulnerable workers, Worker voice,
<b>Morocco</b> Vulnerable workers, Gender, Worker voice, Modern Slavery	<b>Portugal</b> Vulnerable workers, Worker voice Modern slavery,	<b>Mexico</b> Modern slavery, Vulnerable workers, Worker voice, H&S
	<b>South Africa</b> Vulnerable individuals, Gender, Worker voice, Modern Slavery	

*Figure 3. Examples of salient risks in a selection of our source countries.*

BerryWorld Ltd have also mapped their human rights risks against the environmental risks, taking the average risk scores for each country and plotting them. This in turn has allowed them to identify the countries most at risk from the overlapping of human rights and environmental challenges, so we can assess where our targeted actions are most needed, and where they will have the most impact.

Our highest-risk source countries by this measure are **Egypt, Turkey, Greece, Peru, Mexico and Morocco**.

As well as focusing on raw material suppliers, BerryWorld Ltd have also begun to map and risk assess their goods-not-for-resale (GNFR). In 2024, providers and other key stakeholders such as our growers, labour providers and office material providers were mapped. The higher-risk suppliers complete an ethical questionnaire to gain access and learn about their human rights due-diligence, worker profiles, recruitment methods and HR systems. This can then be followed up with additional due-diligence where risks are identified within these supply chains.

### Site Risk Assessment Process

We have a process for conducting an internal risk assessment on our raw material suppliers at site level, which assesses a range of factors including:

- SEDEX Site Risk Assessment
- Length of relationship to Berryworld
- Known Ethical Issues
- FNET Country Risk Score
- Ethical Accreditations
- Methods of Recruitment
- Female Representation
- Site Management Systems.

The risk assessment is completed for growers prior to the season starting, so that we know where to prioritise our supplier engagement and risk mitigation efforts. These updates are completed in collaboration with our international business units, as their intimate knowledge of the suppliers and source countries is invaluable to this process. Following on from completion of the risk assessment, we will

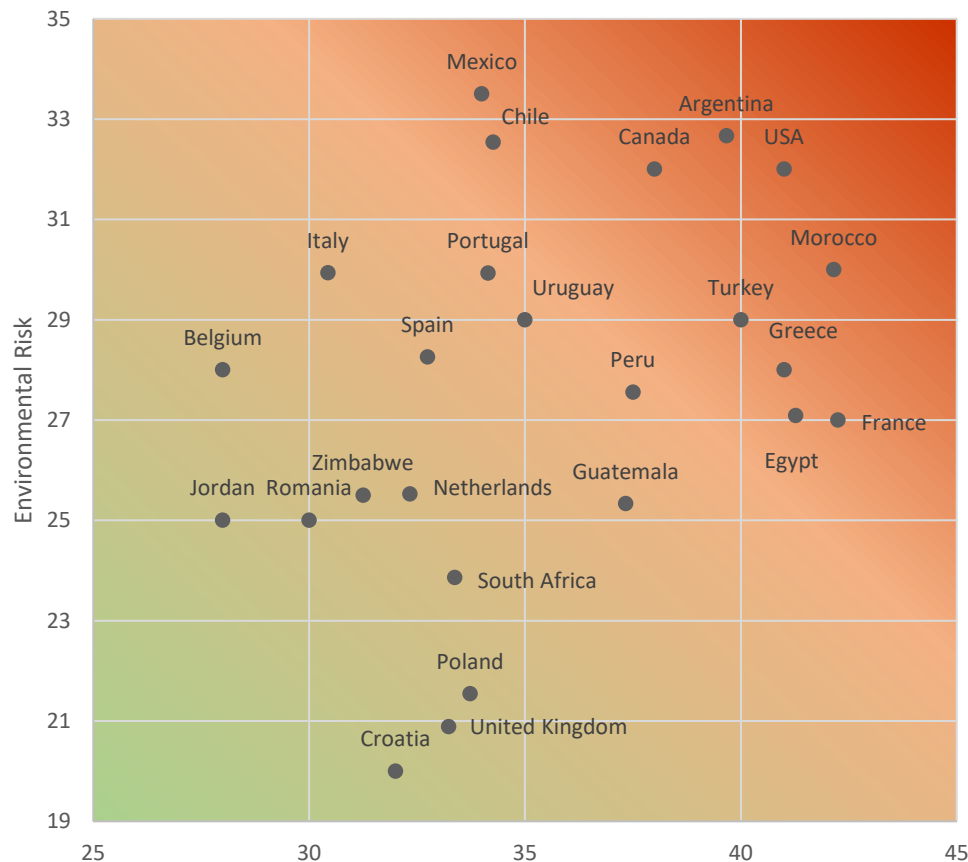


Figure 4. An extract of our risk assessment for soft fruit growers.

engage with suppliers to understand their challenges and management systems, offering support and guidance to help mitigate the risks of modern slavery within their businesses.

### Whistle blowing

At BerryWorld, we have established our own independent whistleblowing line for our growers called Speak Up! The whistleblowing line was established in 2016, originally with the UK growers before being extended to the global supply chain in a phased approach. More recently this included the introduction of the hotline in Egypt and Jordan. This whistleblowing line offers a confidential way for employees to ask questions and report concerns in relation to ethics and compliance (including food quality, safety and legality). It is translated into various languages so it reaches the whole workforce. We provide growers with posters and resource materials so that workers know how to use the line and make reports.



In 2024, there were no substantiated reports linked to modern slavery or labour exploitation from our Speak Up helpline. We will continue to ensure that workers have access to this mechanism, which remains an important tool within our strategy. Our hotline not only works as an important part of our risk assessment, raising issues and concerns directly from workers, but also enables us to remedy labour exploitation, if it was raised.

### Case Study: UK Farm Worker Committee

A worker representative committee at one of our UK farms has successfully been operating since 2011. It is currently made up of 3 worker representatives and 2 members of management. The forum is an opportunity for management to hear the workers voice regarding issues, ideas, and general comments. Worker committees are an important method our growers can use to both identify and mitigate risks on site.

The farm ensures that regular meetings take place every quarter and that the election process is as fair and consistent as possible. The committee is made up of a variety of non-managerial and managerial members with different nationalities and from different teams to ensure the scope covers the whole business.

The worker representatives believe that the committee is hugely beneficial as it provides a different communication path avoiding the standard direct employee to supervisor to management role. Especially when there is a lack of English speakers amongst the workforce it is a good method to support employees in expressing themselves. The farm has found that the committee allows cross-department discussions that communicate horizontally rather than vertically and so allows for better flow of information and ideas.

### Human Rights Due Diligence (HRDD)

Human rights due diligence (HRDD) is a key pillar of our ethical strategy. Taking a holistic approach, we engage across the Group with

relevant stakeholders to continually review our due diligence process and ways of working. Our HRDD incorporates our policies, our customer policies and our risk assessment results, and we aim to support our growers to deliver best practice whilst ensuring the welfare of their employees.

We conduct due diligence on all growers within our supply chain, to make sure the highest standards are maintained and that all growers are following the ETI Base Code and taking actions to prevent modern slavery. This due diligence could include a mixture of:

SEDEX SAQs and visibility	SMETA, SIZA & GRASP Programmes	Internal Audits incl. labour providers.
Worker Surveys	Accommodation Reviews	Promotion of the Just Good Work App
Support sites through the Stronger Together programme.	Grower Exchanges	Thematic Webinars
Grower Engagement Visits	Compliance Tracking & Trend Analysis	Social Projects

Each sourcing country will also have its own risks, and so we conduct specific HRDD per country to support all sites we work with as much as we possibly can. We acknowledge that there is no perfect approach to due diligence that will work for all countries, businesses or people,

so we work hard to tailor our approach whenever needed. Some of the due diligence that we conduct in each source country is shown below:

<b>UK</b>	BW Hotline, BW Ethical forums, RRT, Stronger Together PRT, Modern Slavery training / Champions, Speak up program, SMETA program, SWS taskforce, 50 Club
<b>Spain</b>	Spanish Ethical Forum members, SMETA program, BW Hotline, Speak Up program, Internal audits, Stronger Together sponsors, Internal audits
<b>South Africa</b>	SIZA Program, Stronger Together Group sponsor, female health impact assessment, Recruitment mapping, Internal audits, Emerging Leaders, BW Hotline
<b>Portugal</b>	BW hotline, SMETA program, internal audits, supplier exchanges
<b>Morocco</b>	SMETA program, BW Hotline, Speak up Program, internal audits, Better Strawberry Group
<b>Egypt</b>	Direct Worker reporting & Wider, SMETA program, Egyptian Ethical Forum, recruitment mapping, BW hotline, internal audits
<b>Zimbabwe</b>	Stronger Together training, financial assessments, Prison labour audits, SMETA program, internal audits, social projects
<b>Peru</b>	SMETA program, Internal audits, Speak up surveys
<b>Jordan</b>	SMETA Program, HRIA, Internal audits, BW hotline
<b>Mexico</b>	SMETA Program, SIPAS Ethical training, Collaborative stakeholder engagement, Stronger Together Program

BerryWorld are members of FNET (Food Network for Ethical Trade) and use the FNET risk assessment tool to further support our own due



diligence process when onboarding or reviewing suppliers. Desk based research is also conducted on new countries and new suppliers which identifies and supports us develop approaches to addressing and mitigate key risks.

In 2022 BerryWorld Ltd took part in the Stronger Together Organisational Performance Assessment. The assessment used progressive, consultative techniques to provide BerryWorld with an independent verification of progress in tackling modern slavery both within the business and in the wider supply chain. They have since conducted internal reviews against the same framework, the results of which informed the 2024 strategy, and are looking at options to conduct this assessment again at a later date.

We have recognised the use of labour agencies and potential recruitment fees/irresponsible recruitment as a key risk within our supply chain. Therefore, we have begun to map the labour providers for our growers, prioritising the United Kingdom and South Africa. In the UK, BerryWorld have provided growers with resources on conducting labour provider due diligence, created by Stronger Together and the Responsible Recruitment Toolkit, whilst in South Africa are mapping the labour providers used and their SIZA certification status.

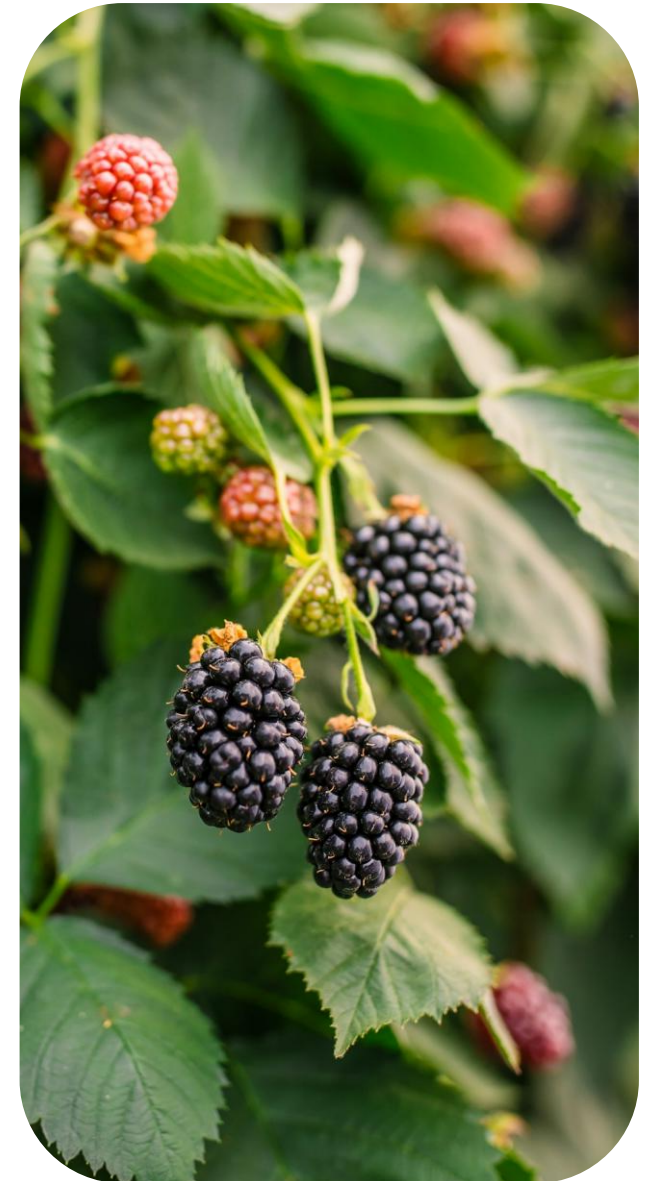
In September 2024 BerryWorld were awarded the **FPC Sustainability Excellence Ethical Award** for the project of supporting the female workforce in South Africa, helping them overcome taboos and gain access to sanitary aid during their menstrual cycle.

Through our ongoing human rights due diligence, found that there are barriers that prevent women in South Africa from being able to attend work due to female health. 25% of women had to take time off work during their period and 81% wanted to understand more about menstruation and the different products available. This led us to consider what support was required to improve worker attendance and productivity. We conducted a needs assessment to understand the challenges and barriers that females may face, which identified a clear need for more awareness and education on female health topics.



As a result, we partnered with a customer to organise and provide female reproductive health workshops. The focus was on increasing awareness of mental health and wellbeing practices around reproductive health and affordable and re-usable menstrual products. These topics were approached through arts therapy, with psycho-educational techniques used to discuss the four phases of the menstrual cycle and their impact on women's wellbeing. Dance and art were used to help women open-up and discuss topics of concern and to introduce practical self-care tools.

*"The experience increased my confidence and self-esteem and taught me how to handle my family and children"*



## Ethical Audits

We use third party ethical audits to support our due diligence process and identify through our own risk assessment which growers may require or feel necessary to have an independent ethical audit. These audits will help to verify any risks on site and highlight both good practices and improvement areas. They can also act as an important tool in finding modern slavery and labour exploitation, with auditors potentially uncovering these concerns through worker interviews and documentation reviews.

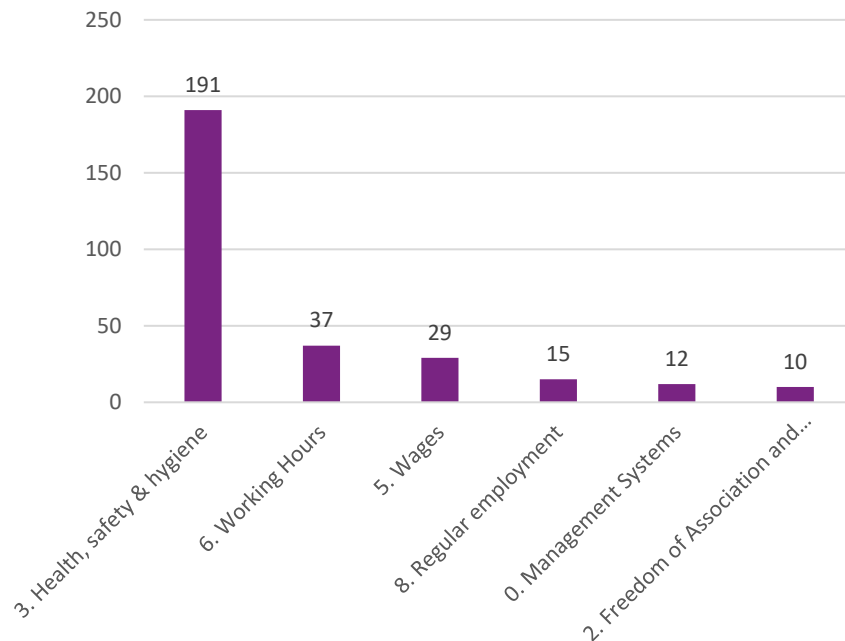


Figure 5. The top six finding categories of non-conformances for one of the company divisions.

Within our wider ethical audit programme, most of the non-conformances found are in relation to health, safety and hygiene, with working hours, wages and regular employment being the next highest areas. When non-conformances relating to 'Employment is freely chosen', the area of the ETI Base code indicating modern slavery, were found, these were not related to any cases of modern slavery. They were instead about the management systems and training required to prevent/remediate forced labour. Building grower capability and ensuring that they have access to training, resources and knowledge remains an important part of our strategy to avoid these NCs going forwards.

However, there will be indicators of modern slavery or vulnerabilities to forced labour within other categories of non-conformance, particularly the areas of working hours, wages and regular employment. Of these, the most common NC was related to payment of wages followed by rest breaks and rest days.

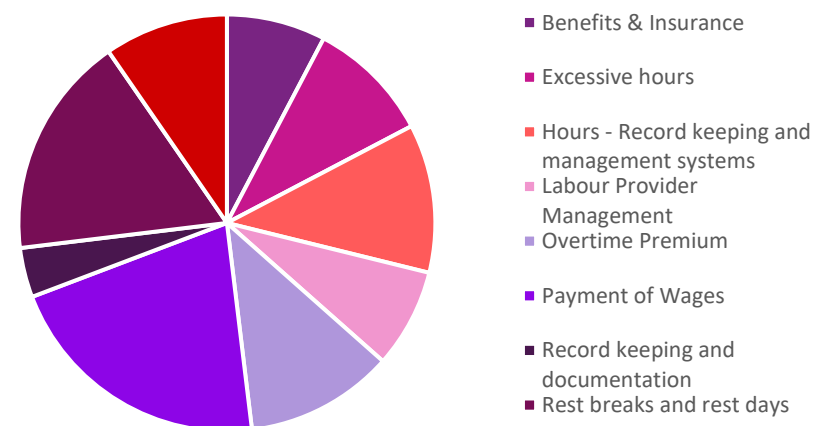


Figure 6. The finding sub-categories of NCs found which were potential indicators for forced labour for one of the company divisions.

None of these non-conformances were linked to or actual indicators of forced labour, however we will continue to monitor non-conformances closely for confirmation of labour exploitation, so we can ensure that cases are remediated. We follow up on any non-conformances raised across our supply chains, in all areas of the ETI Base Code, to ensure appropriate corrective actions are taken.

We also conduct our own internal ethical audits which focuses on the management systems within the business and on areas such as accommodation using the FPC accommodation guidelines. These are used to supplement third party audits, build relationships with sites and workers and to verify the findings of our risk assessments. Visiting our partners ourselves is a critical part of our due diligence as it enables a closer understanding of the risks and of workers needs and concerns.

## Collaboration

### External Partnerships



We collaborate and develop relationships with external industry, national and global bodies with a strong focus around ethical related concerns including modern slavery. The risks of modern slavery occur

## CASE STUDY: UK FARM EXIT QUESTIONNAIRE RESULTS

One way farms can find out about their strengths and weaknesses is to conduct surveys with the seasonal workers on site. This allows workers to anonymously provide their opinion on their workplace, raise concerns, highlight benefits and provide advice for the next season. Whilst worker surveys can be beneficial throughout the recruitment and employment processes, exit surveys can be particularly helpful for seasonal growers.

As part of our Speak Up programme at BerryWorld, we conduct exit surveys with our UK farms support them in gaining this crucial feedback. The survey is short, consisting of ten questions based around fair working practices, onsite facilities and worker wellbeing. Workers can access the questionnaire at the end of the season via a QR code. We share the results with our growers and discuss any key feedback points.

Through this survey we can also highlight growers' good performance, as was the case with one grower in our 2024 exit survey. They received excellent results from workers, including:

- 100% of respondents saying that they would definitely like to return to the farm next year.
- 94% of respondents said they would recommend this farm to family or friends.
- 94% of respondents were happy with their accommodation.
- 94% of respondents felt safe at work.
- 88% of respondents felt very respected at work.



on a global scale, so we believe developing close collaborative partnerships are important in achieving our goals of reducing the risks of modern slavery throughout our supply chain. Our key external partners are the following organisations:

- **Stronger Together:** BerryWorld are a Global Steering Committee member and also a local Steering Committee member in South Africa.
  - We also participated in the Spanish Stronger Together Programme until its conclusion in 2024.
  - BerryWorld support the Stronger Together Initiative which was launched in South Africa at the end of 2017 and since then we have been engaging with all our growers to attend the training with Stronger Together, raising awareness of Modern Slavery and equipping businesses with the knowledge, skills and tools to address any forced labour risks. By the end of 2018, 90% of our growers had attended the training.
  - Since 2022 we have supported Stronger Together on introducing their training on Detecting, Deterring and Dealing with Forced Labour in Agri-Businesses in Zimbabwe for the first time.
  - Our production site focused on prepared produce has attained Stronger Together Advanced Business Partner status.
- **SEDEX (Supplier Ethical Data Exchange)**
- **Food Network for Ethical Trade (FNET)**
- **Spanish Ethical Trade Forums (SETF)**
  - Jointly sponsor the Spanish Ethical Forums which are managed by Conexion Social. These regional events are designed to allow growers and producers to come together to educate, collaborate and discuss issues around worker welfare concerns or challenges they

may have and jointly look at how standards can be improved. BerryWorld are part of the Retailer, Importer Working Group that help support the work that comes through the forums.

- **Fruit Industry Health and Safety Collaborative** (initial meeting took place in February 2024)
- **The Ethical Trade Initiative (ETI)**
- **The Association of Labour Providers (ALP)**
- **The Gangmasters and Labour Abuse Authority (GLAA)** and their local representatives.
- **Sustainable Agricultural Initiative (SAI)**
- **SWS Taskforce**
  - We are funding members of the Seasonal Worker Scheme Taskforce and participate in the various workstreams to represent our grower base in this vital group.



Collaboration and communication is at the heart of our relationships with growers, and this extends to our work on human rights and modern slavery.



- The BerryWorld UK Grower Ethical Forum: This offers all our UK growers the opportunity to meet and discuss concerns, challenges and share ideas developing best practice in a safe, confidential space.
- We also work closely with our retail customers, joining their ethical forums and discussions with other suppliers, along with supporting on projects within the supply chain.
- We have preseason meetings with our growers where needed, to review progress from the last season on worker welfare, plan our actions and mitigations for the next season and share any recent industry developments.
- We have a group of Modern Slavery Champions across our UK sites, and we regularly communicate with them. This includes sharing a calendar of interesting and relevant dates and activities, such as training sessions.

## Training and Raising Awareness

One of our aims was to raise awareness of modern slavery within the different teams at BerryWorld but also in our overseas supply base. We do this through supporting training initiatives and raising awareness within our business.

- We support our South Africa and Zimbabwe to access free places on Stronger Together training courses through our sponsorship of this programme.
- Our UK growers undergo training through both Stronger Together and the Responsible Recruitment Toolkit.
- Our UK growers have access to induction materials on topics such as the BerryWorld Hotline, the Just Good Work app and Menstrual Health that they can use when onboarding and training workers.

- In 2024 we carried out training on tackling modern slavery with our BerryWorld directors, sales, procurement and technical colleagues
- All new starters at BerryWorld have to complete a training course on modern slavery and how to identify this in workplaces.
- We arrange thematic webinars for our growers, carried out by expert speakers, on topics requested by the growers.

## Monitoring and Evaluation

We monitor a variety of KPIs and reports in order to evaluate our performance against our strategy.

- Capturing KPIs on human rights:
  - o Gender e.g. women in management.
  - o Stronger Together Progress Reporting Tool and the Organisational Progress Assessment.
  - o Responsible Recruitment Tool Self-Assessment
  - o SMETA NCs
  - o Speak Up survey results
  - o Speak Up hotline reports
  - o Modern slavery training undertaken
- Supply Chain Risk Assessment Scores
  - o Our ethical risk assessment has been externally verified by The Human Rights Lab at Nottingham University in order to evaluate its performance and maturity.
- Consideration is being made into additional external ethical accreditation for 2025 in order to further identify areas for improvement and evaluate our current performance.
- In 2025/2026 we will review our current suite of ESG and human rights KPIs to ensure they are fit for purpose and aligned with the Sustainable Development Goals.

## Our Plan Going Forwards

We are constantly striving to improve and strengthen our management systems and driving continuous improvement. We will be reiterating our commitment to understanding modern slavery risks across the business and ensure that staff understand what modern slavery is and the risks associated.

If we see an issue, we are committed to working with that particular individual or business to resolve it, we won't walk away. We will continue to operate in a transparent way and believe it is important to visit suppliers both existing and new, to build relationships and show our continued support and commitment.

### Goals for 2025/2026

**Alignment across the Agroberries Group:** Following on from the recent acquisition, a priority for 2025 is to ensure alignment across all businesses under the Agroberries umbrella in relation to modern slavery prevention and responsible sourcing policies. We will undergo a policy review to ensure consistency in goals and objectives, with the aim of bringing all business units to the same level of maturity where possible.

**Internal Human Rights Governance Committee:** We are aiming to establish internal committees across our different business units, with the aim of information sharing on human rights and modern slavery. This could include a committee between the teams responsible for implementation of human rights due-diligence in each business, with the inclusion of directors and heads of department where relevant. This will enable us to share resources, emergent risks and plan mitigation actions, along with ensuring that human rights is included in all areas of our business.

**Child Labour & Remediation Policy:** We are aiming to create a dedicated Child Labour and Remediation policy in the next financial

year. This will be in addition to our existing human rights and remediation policies, to ensure this important topic is addressed in the required depth. We will also roll this out to our grower base and support them in its implementation.

**Mapping of and Risk Assessment on Coir Production:** Coir is a growing substrate, often used as an alternative to peat, which is produced from the fibres on the outer husk of coconuts. This is a key product for our growers both in the UK and worldwide, and this is sourced from ethically high-risk countries such as India and Sri Lanka. Going forwards, we will map and identify the key risks for this product.

**Explore risks within Transportation and Logistics:** There are a variety of potential human rights risks within logistics, from modern slavery and long working hours to illegal movement of people. We are aiming to map these suppliers and prioritise further engagement based on importance and the level of human rights risk.

**Egyptian Ethical Trade Forums:** In the 2025 financial year we are planning to increase our engagement with the forums and become funding members.