



ARGENT FOODS

MODERN SLAVERY STATEMENT 2020

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 2020.

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 2020

- Focused modern slavery refresher training for Directors, Senior Management and Procurement, specific to their roles
- We continued to track and improve on established KPIs
- We continued to support our growers, specifically by running a UK ethical grower day which focused on labour for 2021 giving growers the opportunity to share key challenges and raise any concerns

OUR POLICIES FOR MODERN SLAVERY & HUMAN TRAFFICKING

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 (ST), GLAA, ALP, Food Network for Ethical Trade, Coop and Bright Futures, the Produce Ethical Network, &Wider, Navex Global and Emerging Leaders
- 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
- Reviewing labour providers regularly

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 2020 a new virtual SMETA audit was carried out at one of the UK sites in collaboration with our customers
- *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 a UK Ethical Grower Forum in December 2020 which focused on labour for 2021, such as new immigration system and risks associated with recruitment

- *ST training sessions*: we encourage our growers in South Africa to attend these sessions and the subsequent Taking Next Steps sessions

2020 Collaborations

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

- Collaboration with &Wider to conduct a work place feedback system in Egypt
- Continued to be a member of Strong Together Global Steering Committee and from 2020 became a member of the local Steering Committee in South Africa
- Continue to work with Emerging Leaders to give growers in South Africa the opportunity to develop skills and progress in their careers
- Partnered with Navex Global to provide a whistle blowing communication mechanism to growers
- Organised and provided training for all our UK growers on Mental Health through MIND. This enabled the attendees to become qualified mental health first aiders
- End of year seasonal reviews of our customers and suppliers are carried out against contract conditions and agreements currently in place

COVID-19

COVID-19 has affected many businesses over 2020 and has altered the ways in which the Group has tackled the risk of modern slavery. During the year the following actions have been taken to reduce these impacts as a result of COVID-19:

- Partnered with the wider food industry and sponsored the FoodFarmHelp website, which provides up to date information on all COVID-19 related things
- Collaboration between BerryWorld with Coop, ETI and Partner Africa to conduct a COVID-19 impact assessment in Zimbabwe, which as a developing country could face more severe impacts from COVID-19
- A new virtual SMETA audit was carried out at one of the UK sites in collaboration with our customers
- Introduced social distancing, temperature checking and use of appropriate PPE, and working from home where possible

EFFECTIVENESS

Argent Foods developed key performance indicators (KPI) that were used to monitor the effectiveness of subsidiaries and highlight any areas that need greater focus in 2021. These KPIs include:

- Score achieved on ST 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 SEDES assessment

NEXT STEPS FOR 2021

- Aim to develop an accommodation framework for seasonal workers for growers
- Hold BerryWorld Group ethical forums to align the global business in our ethical strategy
- Continue to develop Senior Management and Line Managements knowledge of the effects of modern slavery
- Continue to be a member of the Stronger Together Global Steering committee and move to support in Spain
- Develop more workplace communication project with &Wider once COVID-19 restrictions are eased
- Implement our sustainability strategy, which puts emphasis on our people, at the non-berry fruit companies

Supporting the Principles and Standards of:

- Ethical Trade Initiative
- Internal Labour Law
- UK Gangmaster & Labour Abuse Authority
- Supplier Ethical Data Exchange (SEDEX)
www.sedexglobal.com
- Stronger Together
www.stronger2gether.org



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

CEO's signature:  **Name: David Gray** **Date: 24 June 2021**

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