



ARGENT FOODS

MODERN SLAVERY STATEMENT 2018

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 2018.

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 FOCUS AREAS FOR 2018

- Development of key performance indicators to monitor progress across the Group
- Further improvement of employee awareness through training and poster displays
- Inclusion of modern slavery information within all employee inductions
- Confidence building at subsidiary level to deal with modern slavery
- Formation of the UK BerryWorld Grower Ethical forum
- Engagement with external organisations

OUR POLICIES FOR MODERN SLAVERY & HUMAN TRAFFICKING

As reported in our previous statements, 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.

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 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, GLAA, ALP, Food Network for Ethical Trade and the Produce Ethical Network
- 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

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 2018 a selection of our growers undertook SEDEX Members Ethical Trade Audits, these will continue to be performed in 2019. We have also worked with suppliers to develop an audit process that they can use to review their labour providers
- *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

- *Supplier training:* we encourage all of our UK fruit growers to attend training provided by our partner Stronger Together. By the end of 2018 90% of our fruit growers had attended this training
- *Support to overseas growers:* we work with our overseas fruit growers either through training, ethical forums or working groups to mitigate any modern slavery risk

EFFECTIVENESS

In 2018 Argent Foods developed key performance indicators (KPI) that will be used to monitor the effectiveness of subsidiaries and highlight any areas that need greater focus. These KPIs included:

- Score achieved on Stronger Together 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 SEDEX assessment

NEXT STEPS FOR 2019

- Develop a Group human rights policy
- Continue to track and improve on established KPIs
- Fruit suppliers to continue to undertake SEDEX Members Ethical Trade Audits
- Support growers by identifying their key risk and mitigations in an ethical manual
- Establish links with a charity which can help the Group better understand how to support potential modern slavery victims

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

Director's signature:



Name: David Gray

Date: June 2019

This statement also applies to all of our subsidiary companies, the main trading entities are listed below.

BerryWorld Group Limited – please find BerryWorld Group's specific statement on their website <https://berryworld.com/en-gb/modern-slavery-statement>

BerryWorld Limited

Fairfax Meadow Europe Limited

OrchardWorld Limited

Norton Folgate Limited

Poupart Limited

Tendercut Meats Limited

Belwood Foods Limited