**G’s Modern Slavery Statement 2015/16**

The statement covers the activities of The Shropshire Group of companies in the UK up to 7th May 2016.

**Introduction**

We are aware of the modern slavery risks and acknowledge responsibility to the Modern Slavery Act 2015.

G’s is committed to establishing action plans to eradicate acts of slavery and human trafficking from our own businesses and from within our supply chain.

We also endeavour to achieve transparency within G’s and with its suppliers. Moreover, G’s commits to respecting human rights and will avoid infringing on the human rights of others and will address any issues that are identified. This will include taking adequate measures for prevention, mitigation and, where appropriate, remediation of incidences of modern slavery found in our business and in our supply chain.

**About us**

G’s is an international market led farming business established in 1952.

From onions to celery, radish to mushrooms and a vast array of other crops, we supply all the majority of UK and many European retailers with fresh, tasty and healthy produce. We believe our success is due to our employees and our focus. Working in partnership to meet our customers’ needs, staying ahead of consumer trends, continually investing and innovating means we are always striving to be better. We believe our attitude and commitment help us to be a leader in our field of expertise.

We remain a family business with very strong values for its people, its customers, the environment, nature and its suppliers. Our values are well established and driven by the business.

Our farms and production facilities are located in UK, Spain, Czech Republic, Poland, Senegal and the USA. These farms provide the majority of our products.

G’s has a network of suppliers who, when needed, supply G’s with fresh products and some ingredients for our ready to eat products. All suppliers are ethically vetted and approved before use.

We employ a large number of Seasonal workers (approximately 2500 annually in the UK). We directly recruit the majority of our seasonal workers who predominately come from EU countries. G’s provides accommodation, pastoral care and social activities on many of its sites. We embrace the fact that we have a diverse workforce.

**Policies and Mechanisms relating to Slavery and Human Trafficking**

G’s has a comprehensive range of policies, procedures and training to guard against slavery, forced labour or human trafficking activity taking place in our business. We have developed and implemented policies that support & promote positive behaviour towards our workers. All our policies are available to employees via the internet and also communicated during induction, workshops and toolbox presentations.

Our ‘Ethical Trading Policy’ clearly describes our expectation that all workers should be treated fairly, whether they are employed directly, supplied via a gangmaster or working for one of our suppliers.
As a responsible business, we are committed to the principles and compliance of the ETI Base Code. We also strive for continuous improvement, therefore our direct businesses will always look to exceed the ETI base code standards and deliver market leading ethical strategies in our direct businesses.

The company supports workers to come forward and share their concerns about any aspect of the company’s work. We encourage workers to voice those concerns via the following channels:

- Our ‘Whistleblowing Policy’ that includes information about law, the process and ways to raise a concern
- Our ‘Speak Up Procedure’ states how to raise a concern and what the options are, including the use of internal and external hot lines. These avenues are communicated at induction and posters are placed on notice boards through our sites
- A staff survey is completed annually, by all Business Units. The aim of the survey is to measure workers’ overall satisfaction with their employment and to identify areas where we can improve. The survey is confidential, and once the results are analysed business units are expected to develop “next steps” action plans
- Focus groups are another channel we use to encourage our workers to speak up. Small groups of workers get together and ask questions about specific topics or issues

We have a structured Recruitment Policy and procedure that is instrumental in preventing instances of trafficking and modern slavery within our business.

We occasionally use high street recruitment agencies to fill some of our more challenging vacancies. We will also use labour providers (gangmasters) at peak times or on occasions when we are short staffed. All agencies used are approved prior to engagement and will be audited on a regular basis.

All workers are asked to supply documentation to prove their eligibility to work in the UK. The staff who carryout ID verification checks are all trained in how to perform visual checks and also in electronic scanning of ID documents.

We have piloted the “Stronger Together” initiative at one of our UK sites. We developed posters, leaflets, improved our induction process and provided workers with information on modern day slavery and trafficking. Following on from this successful pilot we will now roll this initiative out to our other businesses

**Due Diligence and Risk Mitigation: Within G’s**

We believe that as a result of the policies and the processes we have in place, we can demonstrate that our directly employed permanent staff would be considered as low risk in terms of slavery and human trafficking. However we will not be complacent, we will continue to provide workers with information on Modern Slavery to ensure they remain vigilant

Areas identified as higher risk are:

- seasonal workers
- external labour providers

We mitigate these risks by:

- Recruiting directly
- Induction & training processes
- Identity checks
- Qualified HR teams at each site
- Detailed tender process for the selection of external agencies
- Audit and approval of all external agencies
- Service level agreements are in place with all agencies
- “Active check” in place with GLA
- Regular focus groups
- Staff surveys that all workers take part in
- Internal Ethical audit team
- Provision of numerous complaints (hot lines) mechanisms
In addition, we actively engage with several government organisations, i.e. Gangmaster Licencing Authority, UK visas and immigration, Home Office, National Crime Agency. We will work with agencies such as “Stop the Traffik” to support people who, through the National Referral Mechanism, have been identified as at risk.

Due Diligence and Risk Mitigation: Supply Chain

We are primarily a fully integrated business; we grow, harvest and market the majority of our products direct. For our own products we are confident we have the control in place to deal with issues on modern slavery, however we do use 3rd Party suppliers and this is where we believe our greatest risk of exposure comes from. These operations are outside of our direct control and we have to rely on information provided to us by our suppliers.

Our dedicated ethical team is focused on improving working conditions for all workers within the Shropshire Group and its supply chain. We develop and implement leading ethical practices that are recognised by our customers, colleagues and industry peers. We participate in numerous industry networking events and work collaboratively on ethical projects with our customers and suppliers.

We complete a thorough due diligence process when considering new suppliers and once approved we regularly review and update their information. We gather facts from our suppliers, customer databases and information on the inherent country risk. We process this information using our internal risk analysis tool and once this is completed it enables us to make informed decisions on where we need to deploy our ethical resources. Further information gathered for the risk analysis includes:

- Reports from previous internal and second or third party audits that have been completed. This includes analysis of any previous unresolved non-conformances
- What type of labour is used. If in the UK we place GLA active checks on the labour providers
- A country risk assessment is completed using ILO NORMLEX and NATLEX information
- SEDEX registration checks and risk score
- Technical and ethical information submitted via the supplier approval system ‘Muddy boots’. Verification of the information provided; further evidence could be requested if required

Our supply chain is continually changing and new challenges occur on a daily basis. Frequent and consistent communication with our suppliers is vital and we are always encouraging them to improve. We provide support and information on ethical best practices to ensure there is continuous improvement.

G’s is also developing a ‘Supplier Ethical Protocol’ which will form the foundation for cooperation between G’s and its suppliers. Once it is completed it will clearly outline our ethical and sustainability objectives.
Other impacts

Logistics: To help stop illegal immigration during the transportation of our products, keyless locks have been fitted to a number of trucks (£100k in 2015/16). Additional locks (c. 100) will be fitted this year. All trucks leaving our pack houses in Spain are secured with strong one-use seals. This is checked by security at the pack house prior to the lorry leaving site. En route to the UK, only secure parking is used in France and we also have provision to park in the safety of the Euro Tunnel compound. G’s insist that hauliers check all seals daily before moving their trailers and after all rest breaks. Drivers are issued with a Driver Check list which must be signed when checks are made throughout the journey. We co-operate with the UK Border Agency and the police if there is any suspicion of illegal migrants on the transport.

Packaging suppliers are required to complete a supplier questionnaire which includes Ethical information. The Group Ethics Team uses this information to assess the ethical risk. In future specific ethical requirements will be developed for our packaging suppliers.

Training and capacity building

Members of G’s Ethical Department have attended external training on the Modern Slavery Act and Stronger Together initiative. Training sessions with the GLA, ETI and other relevant organisations are hosted by the company and attended by staff from across all departments. Many members of the Ethics Team have undertaken Social Systems Lead Auditor training. ‘Stronger Together’ in-house training has been provided to key staff at one of our sites where high numbers of seasonal staff are employed. All seasonal staff based at our Barway site have been introduced to the ‘Stronger Together’ initiative as part of their induction process.

To ensure a high level of understanding of the risk of modern slavery within business units, G’s are developing training and awareness activities for staff which will be rolled out in due course.

This statement has been approved by John Shropshire, Chairman of G’s Fresh on the 15th September 2016. It will be reviewed and updated annually.