

HUMAN RIGHTS & MODERN SLAVERY: ETHICAL STATEMENT 2019

This statement is being published in accordance with the universal rights covering UNGP responsibilities and Modern Slavery Act 2015 and outlines the R&G Fresh approach to tackling and preventing modern slavery within both our business and supply chains.

Introduction

R&G recognises the upmost importance of ensuring that we adhere to our values of delivering the finest quality fresh cut herbs to our customers, in an ethical manner. We value the contribution of every individual who makes this possible and we believe in treating everybody associated with R&G well, contributing positively to society, building positive relationships with our customers and suppliers and delivering sustainable growth for our workforce and partners.

R&G Fresh has a zero-tolerance attitude to forced labour, slavery, servitude and human trafficking, we are committed to conducting our business with integrity and treating others with dignity and respect.

We abide by the four core labour standards as enshrined within the International Labour Organisations (ILO) Conventions:

- Freedom from forced labour (enshrined in Convention 29 on Forced Labour (1930) and Convention 105 on the Abolition of Forced Labour (1957)).
- Freedom from child labour (enshrined in Convention 138 on Minimum Age for Entry into Employment (1973) and Convention 182 on the Worst Forms of Child Labour (1999)).
- Freedom from discrimination at work (enshrined in Convention 100 on Equal Remuneration (1951) and Convention 111 on Discrimination in Employment and Occupation (1958)).
- Freedom to form and join a union, and to bargain collectively (enshrined in Convention 87 on Freedom of Association and Protection of the Right to Organise (1948) and Convention 98 on the Right to Organise and Collective Bargaining (1949)).

We have policies in place which support our stance on forced labour and modern slavery, which are regularly reviewed and updated and which include: -

- Positive Work Environment Policy
- Equal Opportunities
- Anti-Bribery
- Grievance
- Whistleblowing

Our Business Structure

R&G Fresh is a low-risk Partnership-owned business which focuses on providing the highest quality, safely produced fresh cut herbs for our diverse retail, wholesale and food service customers. We are a single-site business based in Farnborough, Hampshire where we employ approximately 90 people.

Our Policies and Controls

Our policies reflect our strong, ethically based stance on forced labour and modern slavery and our commitment to ethical business practices. Our policies apply to all employees of R&G Fresh and are communicated, implemented and embedded within the business, through the actions and behaviours of our management team.

Following a review of our practices relating to forced labour, we have also introduced an Employee Assistance Scheme (EAP) via Bupa, for our employees and their families, providing direct, completely confidential access to external assistance, for anybody with any questions or concerns related to any aspect of their employment, wellbeing or R&G's business practices. This will enable any concerns to be reported so that we may take the correct remedial action immediately.

Recruitment Practices and Trade Unions

We directly assess the eligibility of every employee as to their ability to legally work within the UK. We review and update our processes regularly and advise and train colleagues as appropriate.

We prohibit the use of forced labour, bonded labour, prison labour or child labour within our Company or those that supply us. This includes slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, child labour and internal or international trafficking.

We ensure that all our employees work voluntarily for us and are not intimidated or threatened to enforce employment. Also, that they retain their rights and privileges.

We do not employ any person under the age of 18 years. Concise records are held for employees and our regular performance appraisal process, (known as 1:1's) ensures that the employee is fairly treated and has 'a voice' to represent themselves and to notify of any contravention with the directives of this policy. Receipt and review of official documented evidence of date of birth (i.e. Passport, National Identity Card) is a pre-requisite for all workers.

Managers who are responsible for employee recruitment and monitoring procedures associated with forced labour, bonded labour, prison labour and child labour or supplier chain implementation and evaluation are given training, guidance and instruction to ensure that they understand the law, the processes and can effectively administer its directives. We have procedures in place to ensure that we maintain this policy and ensure that our suppliers do the same.

We encourage staff to raise any concerns at any time about an incident that has happened in the past, is happening now, or believe will happen in the near future that could count as whistleblowing, a flyer is on display and that they're protected by law if they report any of the following:

- a criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, e.g. doesn't have the right insurance
- you believe someone is covering up wrongdoing

Following a past review of business practices, we implemented an employee assistance programme (EAP) via Bupa, so that our team can access confidential, external support or advice from trained counsellors, should they have any concerns at all, relating to their employment. The EAP provides 24/7 access to trained help and advice throughout the year.

We also implement a Staff Forum, in conjunction with our team members, who will self-nominate and elect representatives of their choice to ensure that the wider teams collective views can and are heard by senior management. We are committed to working with our colleague forum to promote communication, information and consultation within all areas of the business and to fostering a supportive, progressive relationship with our forum.

We also respect and recognise the right of our employees to freely join associations (such as workers' councils, trade unions and workers' associations) who can collectively represent their interests.

We are committed to ensuring awareness of the potential for forced labour to occur within our business and supply chain and we adopt a cross-team approach, utilising the skills of our Human Resources, Technical and Procurement teams to ensure that we prevent this from occurring and to challenge any unethical behaviour or practices.

Our Supply Chain

We source goods and services from both UK based and internationally based partners to support the delivery of our services. From outside of the UK, we purchase herbs primarily from the following countries:

- Europe (UK/Spain/Cyprus)
- Africa (Morocco/Kenya/South Africa/Ethiopia)
- Middle East (Jordan)

Our providers range in size from SME businesses up to larger organisations employing up to 1000 people. However, we do not have a dedicated 100% source for R&G, in most cases we are 2-7% of large farms and up-to 20% for smaller farms.

Due Diligence

Our due diligence process, considers the steps suppliers take to ensure modern slavery does not exist within their business and supply chain. Spots checks take place during farm and pack-house audits (Inc. legal right to work check, worker welfare, hours & wages as well as H&S assessments)

All suppliers are required to sign up-to Waitrose ethical policy and sign up to SEDEX (including annual self-assessment questionnaire). The Waitrose Ethical policy is a Code of Conduct stating our minimum expectations of human rights standards and labour conditions with which providers are expected to treat employees. The Code of Conduct was revised during 2016 to strengthen the principles on modern slavery and human trafficking. Adherence to all relevant laws relating to human rights, human trafficking and modern slavery is essential and new contracts now require suppliers

to inform us as soon as practicable should they identify a breach of the Modern Slavery Act in their business or supply chain.

Supply Chain Risk Assessment, we have conducted a risk assessment of our supply chain per the nature of the goods or services, their origins, and the extent of subcontracting. This risk assessment has led to us seeking further information from a small number of suppliers to deepen our understanding of their supply chain, and will form action we take in 2017/18 to more fully understand our risks.

Evolving approach, we are committed to continuing to develop our understanding of the issues and mitigating the risks involved in modern slavery. We will continually review our policies, processes and controls, and improve the mapping of our supply chain to identify areas of high risk. During our 2017 visits to suppliers we have decided because of continuous risk assessments the best way to provide assurance that high risk sectors of our supply chain are free from modern slavery, is for all our farmers to have a third party SMETA or equivalent audit by end of 2018. We are well on our way with this goal as 5 out of 11 sites are already SMETA or equivalent audited.

We will also continue to engage and collaborate with companies as we strive to further improve standards and transparency across our supply chain.

This statement has been reviewed in 2019, pursuant to section 54(1) of the Modern Slavery Act 2015 as well as UNGP and constitutes the R&G Fresh approach to ensuring that Modern Slavery does not occur within our business or within our Supply Chain. It has been approved by R&G's Senior Management Team and will be reviewed annually.

Mathew Prestwich

Managing Director