

Abbey View Produce, Galley Hill, Waltham Abbey, EN9 2AG

Modern Slavery and Human Trafficking Statement

Year Ending December 2022

Head of Technical
8/30/2023

This statement meets our legal reporting obligations within the Modern Slavery Act 2015 Section 54 Transparency in supply chains etc provisions and The Modern Slavery Act 2015 (Transparency in Supply chains) Regulations 2015.

The aim of this statement is to illustrate how we are developing an appropriate and effective response to Modern Slavery, be transparent about what we are doing and drive-up standards in labour markets and supply chains both in the UK and our international supply chains.

Agriculture and farming have long been identified as a high-risk industry for modern slavery and at Abbey View Produce, we take our duty very seriously to ensure that both our business and Supply Chains are free of Modern Slavery and any hidden labour exploitation.

At Abbey View, we have both shaped and implemented a very clear set of policies and actions which outline our Commitment to being proactive when tackling hidden labour exploitation and Modern Slavery.

Background Information

- Abbey View Produce Limited has its roots in the old Covent Garden Market. Formerly known as George Coleman (Lea Valley) Limited, it was an offshoot of George Coleman (London) Limited, a company with more than 200 years history.
- In 1985, the company purchased the Abbey View Nursery, growing tomatoes and took its first steps to become a grower in its own right.
- In 1998, Abbey View Produce Limited took the decision to further strengthen the supplier base, forming the first Producer organisation in Lea Valley. A subsidiary company called Abbey View Producer Organisation Limited has been created and all 22 growers agreed to participate in this.
- In parallel, a new state of the art pack-house was built to cover the packing needs for major multiples and other Abbey View Produce customers. The pack-house was extended in 2013 to 3 times its original size, to align with the growth of the business.
- After a 3-year detailed development process, the construction of a Low Carbon Green House was commissioned and in 2021, Abbey View Produce (KB100 Greenview Nursery) was planted for the first time with 12.5 Ha of Peppers.

Our Products and supply chains

- We supply salad products such as cucumbers, peppers , aubergines and tomatoes to retail customers, food service customers and wholesale markets.
- We have a strong UK supplier base and also own our own nurseries (currently growing peppers) . We top up volumes in the summer season from Netherlands and Belgium.
- AVP also import product in the winter from countries such as Spain , Canary Islands, Israel, Morocco, Turkey and Greece.

Our Existing Process

Abbey View Produce is a member of SEDEX (the Supplier Ethical data Exchange) which is dedicated to driving improvements in responsible and ethical business practices in global supply chains. All our UK growers and imported supply is registered with SEDEX and have an up-to-date SAQ completed at 100%. Abbey View Produce works to the base standards of the Ethical Trade Initiative and are also members of the Spanish Ethical Trade Association, being one of its founding members and sponsors.

Abbey View operates with both a skilled and experienced HR and Technical team, both of which function within a series of policies encompassing recruitment, selection, inductions, training and management of our employees. All Managers are supported by the HR team when dealing with any ethical or personnel situations.

Our company handbook details how Abbey View Produce values differences and aims to treat people with respect and conduct all activities in a non-discriminatory manner.

Modern Slavery Compliance Group -

Abbey View Produce has a Modern Slavery Compliance Group which comprises of the Commercial and Operational Directors as well as members from both the HR and Technical teams.

The group assesses risk, identify actions and implements decisions in relation to modern slavery. The Commercial Director has express accountability for ensuring AVP has an appropriate and effective response to mitigate and address modern slavery and human rights risks including the impacts on our business and supply chains.

In addition, we have appointed a Modern Slavery Champion – our Head of Technical.

Speak Up /Whistle blowing policy.

Abbey View Produce commits to a confidential reporting system enabling staff including agency, contractor, or visitor to report concerns relating to product safety, integrity, quality, legality and any ethical questions colleagues may have.

Our senior team encourages all employees including agency staff to write down their concerns and post them anonymously in the 'Speak Up' suggestion box. The suggestion box is in an easily accessible place, away from CCTV cameras. All concerns are captured by the HR Manager and are allocated to relevant department head. Any ethical questions or concerns are dealt with in the strictest of confidence by the HR Manager and the Company Directors. Any suggestions which can be collectively addressed are discussed during staff meeting.

Preventing Hidden Labour Exploitation and Modern Slavery

The Abbey View Produce Policy Commitment is based on the following background information.

"Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour

exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, who can be reluctant to come forward”.

The Abbey View Produce Policy on Preventing Hidden Labour Exploitation and Modern Slavery is signed by both the Operational Director and the HR Manager and is displayed in the main colleague walkway.

The Policy Commitments are.

- Designate appropriate managers (*as per Ethical Leader decision*) to attend training and to have responsibility for developing and operating company procedures relevant to this issue.
- Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for.
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
- Provide information on tackling “Hidden Labour Exploitation” to our workforce through a variety of formats such as workplace posters, worker leaflets, other communications, other training – following AVP Ethical Leader decisions.
- Encourage workers to report cases of hidden third-party labour exploitation or modern slavery and when required, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.
- Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

We use resources such as those provided by ‘Stronger Together’ to inform our staff about Modern Slavery, its signs and where to access help outside AVP. The information is provided in multi languages , covering our workforce origins and languages spoken and is displayed in easily accessible common areas .

We include slides in our induction training alerting staff to the main signs of colleagues living under Modern Slavery and highlight where they can get help for themselves or colleagues . Stronger Together posters are also displayed in the training room, and we highlight where these can be additionally found on site.

Supplier Ethical and Modern Slavery Audits

Throughout the course of the year, the Abbey View Produce Technical team completes a series of Grower Ethical Audits which incorporate potential Modern Slavery and hidden labour exploitation.

British Growers – All growers are required to have third party accreditation to Red Tractor or Global Gap. These standards have elements of worker welfare and ethical checks in the standards.

For example

- Living conditions on site are adequate (in line with what is required in that specific countries legislation),
- Health and Safety legislation adherence,
- Adequate washroom and toilet facilities,
- Gangmaster (GLA) certification,
- Adequate PPE
- Adherence to Pesticide regulations,

Any non-conformance will be captured, and corrective action issued with accountability and timeframe.
Note. If the non-conformance directly compromises the individuals' safety and presents a risk, the non-conformance issued will require an immediate resolution.

In addition, all growers have to be registered on SEDEX have a SAQ at 100% and this is reviewed by Abbey View Produce Ltd.

Imported Supplies – all suppliers, in addition, need to have an independent third-party ethical audit to GRASP and/or SMETA methodology. The level of ethical accreditation depends on the risk level of country and origin and also to customer (retail) requirement. We use the RADAR tool on SEDEX to investigate risks in current supply chains and potential , in development, supply chains and new countries.

We continue to be involved in the Spanish Ethical Trade Association and encourage our Spanish suppliers to partake in the working groups, forums and training opportunities that come from the association tools that focus on themes such as worker representation and effective grievance mechanisms .

Labour Provider Ethical Audits

Our HR and Technical team carry out checks on our Labour providers on a regular and unannounced basis . These checks are timed (typically asking for the information within 24 hours) , staff are selected by AVP to test a range of characteristics and pay conditions . The checks include identification , right to work and pay slip details and rates .

Labour Providers need to provide evidence for the following.

- Right to Work documentation,
- Suitable working age,
- Was employment freely chosen (deposit held by labour provider?),
- Signed contractual agreement,
- Training records,
- Rate of pay equal or above the minimum wage,
- Are working hours monitored and or excessive,
- Is overtime on a voluntary basis,
- Are there unlawful wage deductions,

- Are there threats, abuse or forms of intimidation,

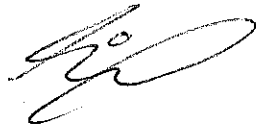
**Under our Modern Slavery policy, Abbey View Produce has committed to supporting those most affected by the policy, ensuring they understand and comply with Modern Slavery Act.
We at Abbey View Produce will continue to diligently adhere to our Modern Slavery and Labour Exploitation Policy.**

Statement completed by;

Mr Scott Wilkinson
Operational Director



Mr Luke Hibberd
Commercial Director



Gill Wardell
Head of Technical



