



ARGENT FOODS

MODERN SLAVERY STATEMENT 2021

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 2021.

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 IN 2021

- BerryWorld established modern slavery champions at each of our UK sites and created an email address group
- We continued to track and improve on established KPIs
- We continued to support our growers, specifically by running UK ethical forums
- BerryWorld developed their own worker survey app for growers to use
- PrepWorld promoted a free interactive app, Just Good Work, that helps jobseekers and workers understand their UK employment rights, recognise poor treatment at work and access remedy
- PrepWorld ran an essential skill workshop on modern slavery for team leaders and above
- PrepWorld developed new policies including a Remediation policy with a response plan on what to do if a case of modern slavery is identified
- Ethics is now included as an agenda point on monthly management meetings at TOFCo

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, presentation slides on TVs in canteens 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, & Wider 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
- *Supplier training:* all suppliers are encouraged to attend Stronger Together training

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:

- *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. In 2021 an ethical forum was run by BerryWorld which discussed right to work checks with our UK sites.
- *ST training sessions*: we encourage our growers in South Africa to attend these sessions and the subsequent Taking Next Steps sessions
- *Suppliers modern slavery statements*: we ask all our tier 1 suppliers to send us their modern slavery statements
- *GRASP audit*: suppliers for TOFCo and Imports have been encouraged to undertake GRASP auditing, a GLOBALG.A.P add-on, at grower level as a minimum ethical requirement

2021 Collaborations

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

- Collaboration with &Wider to conduct direct worker reporting on one of our growers in Scotland
- Continued to be a member of Strong Together Global Steering Committee and 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
- Reached out to Human Rights Lab to get a 3rd party to review BerryWorld's risk assessment and ethical strategy
- PrepWorld actively participated in Food Network for Ethical Trade workstream discussions

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 2022. 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 2022

- Start modern slavery training for Zimbabwean suppliers, which will be the first in Zimbabwe to take place
- Start of a project focusing on period poverty and gender specific issues within BerryWorld supply chain; there are currently opportunities to join with a women's rights charity
- Quarterly modern slavery updates in HR newsletters to all PrepWorld staff
- Monthly 1:1 meetings with all our PrepWorld suppliers with an Agenda touching on approach to mitigating risks.
- Aim for 100% of TOFCo UK growers to be at least GRASP accredited prior to 2022 harvest

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:

A handwritten signature in black ink, appearing to read "David Gray", written over a horizontal line.

Name: David Gray

Date: 28 April 2022

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

BerryWorld Group Limited
BerryWorld Limited
OrchardWorld Limited
Norton Folgate Limited
Poupart Limited
Poupart Imports Limited
Belwood Foods Limited