



ARGENT FOODS

MODERN SLAVERY STATEMENT 2023

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 2023.

OVERVIEW & STRUCTURE

Argent Foods is a diversified international Group with operations in Europe, Australasia, North America and Africa. We focus on the processing, procurement, supply and marketing of fresh fruit and produce and poultry.

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 2023

- PrepWorld now has Modern Slavery as an agenda item for Employee Forum meetings
- PrepWorld ran Quarterly Strong Together workshops for Team Leaders and above
- BerryWorld UK became part of the Seasonal Worker Scheme Taskforce which includes a workstream that is developing an industry leading audit on labour providers
- All TOFCo temporary labour was sourced through ProForce – the first business to undertake the Seasonal Worker Scheme audit programme
- BerryWorld UK participated in a project conducted by De Montfort University entitled 'Recruitment challenges in the agricultural sector following implementation of the post-Brexit immigration system'
- BerryWorld UK conducted a gender based human rights impact assessment in South Africa and the UK, trying to understand the barriers that women may face when going to work. With the results of the assessment some female health workshops were conducted in South Africa.

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. 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

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 (in multiple languages), 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, 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 following procedures have been implemented 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:* training is provided to employees who work directly with the suppliers
- *Supplier training:* all suppliers are encouraged to attend Stronger Together training
- *Agency workers:* agency staff at PrepWorld are all shown ST video as part of induction and all labour providers are ST Business Partners

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
- *Ethical Trade forum*: suppliers in Egypt and Spain are encouraged to attend their annual Ethical Trade Forum
- *ST training sessions*: where relevant we encourage our growers 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
- *SMETA audit*: suppliers from High-Risk countries have SMETA (Sedex Members Ethical Trade Audit) audits conducted annually
- *Responsible Recruitment Toolkit (RRT)*: growers are supported to join RRT, work through the framework and attend training sessions. During 2023 BerryWorld UK paid for the Supply Chain membership which allows more visibility of growers' progress against the framework and training
- *Progress Reporting Tool (PRT)*: working and supporting UK growers with their PRT which is a scoring system that BerryWorld are able to monitor progress of
- *Modern Slavery Champions*: all UK sites have a Modern Slavery Champion and a calendar is communicated to all of these every 3 months which highlights important upcoming events
- *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
- *Refresher*: informal refreshers take place ahead of each TOFCo packing season at British Cherry Growers

2023 Collaborations

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

- Continue to work with Stronger Together and sponsor them in Spain and South Africa
- BerryWorld UK are members of and continue to support the Spanish Ethical Forum and encourage Egyptian suppliers to attend the Egyptian Ethical Forum
- BerryWorld UK and PrepWorld are Responsible Recruitment Tool Business Partners (part of ST) and are part of Food Network for Ethical Trade's Responsible Recruitment Working Group and Risk Assessment & Mitigation Working Group

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 2023. 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 SEDEX assessment

NEXT STEPS FOR 2024

- TOFCo to host Stronger Together courses/training within Sittingbourne facility
- Suggestion for group companies to have quarterly Teams meetings to promote collaboration and exchange of knowledge
- Continue involvement in Seasonal Worker Scheme Taskforce
- BerryWorld UK to develop a modern slavery risk assessment for suppliers
- BerryWorld UK to set up a programme to visit supplier sites to review and support ethical systems
- Investigate options with Stronger Together to support growers in Mexico
- Look at rolling out more female health workshops to other South African growers
- Look at opportunities for involvement in a heat stress project in Spain and BerryWorld UK to develop their Ethical Strategy and Human Rights Due Diligence to incorporate climate change
- Conduct a pilot of a Speak Up survey in Portugal – focusing on recruitment and worker welfare

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:



Name: David Gray

Date: 30 May 2024

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

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