



ARGENT FOODS

MODERN SLAVERY STATEMENT 2022

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 2022.

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 2022

- We continued to track and improve on established KPIs
- We continued to support our growers, specifically by running UK ethical forums
- PrepWorld achieved Advanced Business Partner status with Stronger Together (ST) based on implementation of ST's good practices for employers in the UK
- PrepWorld developed a Response and Mitigation policy for instances if a modern slavery case is identified onsite
- BerryWorld developed their own worker surveys in multiple languages using QR code technology
- A consultant was employed at BerryWorld to test their Remediation policy, BerryWorld have since updated this policy for the feedback provided
- BerryWorld conducted a Human Rights Impact assessment on gender in South Africa and the UK

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 (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, 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

- *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
- *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
- *SMETA audit:* suppliers from High-Risk countries have SMETA (Sedex Members Ethical Trade Audit) audits conducted annually
- *Responsible Recruitment Toolkit (RRT):* during 2022 growers have been supported to join RRT
- *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

2022 Collaborations

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

- 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
- BerryWorld and PrepWorld registered for Responsible Recruitment Tool Kit (part of ST) and joined 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 2023

- Start including modern slavery prevention as an agenda point for Employee Forum meetings at PrepWorld
- PrepWorld to become a RRT Business Partner
- Looking into re-establishing monthly/quarterly modern slavery Argent Group meetings
- Investigating options to link Mexican growers with ST
- BerryWorld to have individual ethical meetings with each grower pre-season
- Domestic abuse webinar and mental health first aider refresher training scheduled for UK growers
- BerryWorld to incorporate wider supply chain into Diversity and Inclusion policy and risk assessments

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:** 23 May 2023

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