



# Modern Slavery & Human Trafficking Statement 2024

## Global Growers Limited

(Reference Period 1.1.24 to 31.12.24)

### Introduction

This statement has been published in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Global Growers modern slavery and human trafficking statement for the financial year commencing **1<sup>st</sup> January 2024** and ending **31<sup>st</sup> December 2024**. The Act makes provisions about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims. In accordance with the Act, this statement articulates our policies and practices around recognising and preventing human trafficking and slavery in our supply chain.

### Our Business Structure & Governance

Global Growers is a subsidiary of the non-UK registered Global Pacific Food Group Limited. Global Growers directly employs staff in the UK. The company specialises in the procurement of fresh produce from around the world for sale in the UK, Europe and Ireland. Our Chairman and the Board of Directors are ultimately responsible for delivering our commitments on tackling modern slavery in our business and our supply chain. In 2023 we hired a Sustainability Manager to support the Technical department in compliance and better address human rights risks in our supply chain and in 2024 we expanded the department to a dedicated Sustainability team who work to prevent human trafficking and slavery in our supply chain through the assessment, monitoring and remediation of supplier risk.

### Our Supply Chains

As a group we source fresh produce from approximately 100 Tier 1 suppliers in more than 20 countries. Our supply chain includes contracted packers who are responsible for their workforce. Within the total Global Pacific supply chain there are considerably more workers who are not directly employed by us or our suppliers yet work within our supply chain that we are obliged to protect. This is a complex task and therefore one that all tiers within our supply chain must agree to target when entering a supply agreement with Global Growers Ltd.

### Our Policies

The cornerstone of our approach towards tackling modern slavery & human trafficking in our supply chain is our Responsible Sourcing Policy. To keep up with ever evolving legislation and to ensure continuous improvement of our Responsible Sourcing Policy as well as our Supplier Agreements & Modern Slavery Act Fact Sheets for our staff and our suppliers, are regularly reviewed and updated where necessary. To conduct business with Global, all suppliers must sign up for and comply with its stipulations.

### Collaborative Action

Modern Slavery is a complex issue and as a result it is vital that we work closely with external stakeholders including NGO's, charities, trade union organisations and our customers wherever possible. We are members of Stronger Together, a UK multi-stakeholder collaboration between supermarkets, industry trade associations, NGO's, individual employers, labour providers and trade union representatives. This initiative seeks to reduce the occurrence of forced labour, labour trafficking and other forms of hidden third-party labour exploitation. In 2024 our Sustainability team attended Stronger Together training sessions to better understand the proactive measures we can



take to reduce the risk of modern slavery in our business and supply chains and keep up with developments in legislation in the UK and abroad. They share learnings with the supply base, and provide our staff with helpful guidance to support them in their roles. We encourage them to contact Stronger Together through the helpline numbers if they have concerns that they or colleagues are victims of Modern Slavery or Human Trafficking.

We continued to participate in The Food Network for Ethical Trade (FNET) working groups and meetings, attend webinars, and access their guidance documents through their web site [www.FoodFarmHelp.com](http://www.FoodFarmHelp.com), the content of which we share with our suppliers. In 2024 we began participating in the Climate Change & Human Rights working group to increase our understanding and build capacity to tackle their joint impact. Our UK service providers maintained their standards in 2024, with protecting their workforce being considered more important than ever before to ensure continued service of customers.

In 2023, we engaged and began collaborating with Partner Africa, who specialise in improving the lives of vulnerable workers and producers engaged in international supply chains. This collaboration resulted in the creation of our Responsible Sourcing Policy, which outlines our minimum requirements to ensure fair and safe working conditions throughout our supply chain; a mandatory Human Rights SAQ which assesses supplier risk in relation to human rights, and alignment with our Responsible Sourcing Policy; and our Ethical Risk Assessment Matrix which assigns risk ratings to suppliers. These tools allow us to consistently monitor ethical risk within our supply chain.

Once again Global Growers staff attended and participated in produce industry working groups such as the Spanish Ethical Trade Forum, who meet specifically to discuss issues and share best practice across the produce sector. We continue to commit to attending seminars, conferences and working closely with our customers on this matter.

### **Due Diligence & Risk Assessment**

We continue to be AB members of the Supplier Ethical Data Exchange (SEDEX), a not for profit membership organisation dedicated to driving continuous improvements in responsible and ethical business practices in global supply chains. We use SEDEX to help us assess risk and manage compliance across our Tier 1 supply base who are all required to be members, complete a self-assessment questionnaire (SAQ) which includes indicators of forced labour, and share visibility of this information with us as part of our basic due diligence requirements. As a minimum requirement and a prerequisite to supply, all suppliers to Global must register each site of employment and fully complete a SAQ and each site must then be linked to Global Growers as a direct customer to provide us with transparency of employment sites, their SAQ and any Independent Ethical Audits undertaken. Global's Technical department track the progress of suppliers in maintaining their membership status, completing & updating SAQ's, and closing out of audit non-conformances within the agreed timescales. The Sustainability team are responsible for assessing the severity of non-conformances and assigning growers a risk score on the ethical risk matrix.

We are also members of the Sustainability Initiative of South Africa (SIZA) which provides a platform for agricultural stakeholders to ensure ethical and environmentally sustainable trade. This platform monitors care for the environment and compliance with labour legislation. Their aim is to encourage continuous improvement in practices over time in excess of the minimum legal requirements. They engage directly with their stakeholders throughout the value chain in order to manage risks and identify needs and issues. Interventions and support tools are created by measuring member compliance over time.



Our Supplier Visit Report is completed on staff mobile devices whilst on farms and in packhouses overseas and reports shared with the senior management team. The tool includes mandatory questions about the suppliers / site management / subcontractors understanding of Modern Slavery & Human Rights and requires the user to record and escalate to a Director any concerns they have. We have updated our supplier evaluation methods through restructured Score Cards. Score Cards guide our future relations with suppliers based on their performance over multiple factors. Throughout these updates, we have focussed on evaluating ethical risk within our supply chains and using this as a key driving metric within our Score Cards. Our Ethical Risk Assessment Matrix continues to be regularly updated to more accurately monitor and score ethical risk within our supply chain. Previously, risk scores were largely based on our Human Rights Self-Assessment Questionnaire (SAQ), however, expanding the Technical department to include a dedicated Sustainability team allowed us to increase our presence in sourcing countries and engage more deeply with the supply base through our new Sustainability Visits. Thus, we updated the weightings of how we score factors which contribute towards a supplier's risk on the matrix to take account of this. Other trusted sources which feed into the final risk score are Sedex/Siza SAQ's and Amfori BSCI/Global Gap Country Risk Classifications. If suppliers are considered high or medium risk, Sustainability Managers conduct an On-Site Assessment to more closely evaluate potential risks and create mitigation strategies with the suppliers.

Sustainability Visits are conducted by Sustainability Managers to support continuous improvement in our supply base. They monitor supplier compliance regarding our human rights and environmental requirements, ensuring they are doing their part to prevent modern slavery and human trafficking. In addition, they work closely with suppliers to ensure they are prepared for audits and assessments.

### **Training & Raising Awareness**

We continue to invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through Stronger Together training programmes, commercial, technical & sustainability managers are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

The Modern Slavery Act Fact Sheet we previously produced and shared with all staff and suppliers continues to give them a simple guide and also useful links to SEDEX briefing notes, and guidance from the Ethical Trade Initiative (ETI). One of our new Source Sustainability Managers maintains their status as a qualified auditor, using their knowledge and training to support the team and their work, and keeping us abreast of developing standards. New employees to our Commercial and Technical Team are briefed on Modern Slavery as part of their induction. This briefing includes reading of the literature already mentioned, and an introduction to our risk assessment and due diligence processes, so they understand from the start of their career with Global that Modern Slavery and Human Trafficking is an issue we take seriously and will not tolerate in our supply chains. This is extremely important in driving a culture of intolerance through all departments associated with the procurement and assurances of our supply chains from the moment new colleagues join.

### **Victim Support**

If a case of exploitation is suspected or exposed within our supply chain, we will work closely with our suppliers and third parties to help them manage the situation so as not to endanger the victim or any future criminal case. We will take guidance from the UK Government and organisations such as



Stronger Together & FNET on appropriate remediation practices whilst keeping our customers informed. Through consultation with Partner Africa and by hiring new Sustainability Managers in sourcing countries, we have further increased our on-site presence within our supply base and aim to identify and remediate any risks efficiently.

### **Performance Measurement**

We aim to continually assess our performance and effectiveness in tackling modern slavery. In 2024 our Sustainability Managers carried out 28 Sustainability Visits and we performed eight On-Site Assessments with the support of Partner Africa. As with 2023, there were no reported incidents of Modern Slavery or Human Trafficking in the Global Growers supply chain this year.

### **Next Steps**

In 2025 we will continue raising awareness of Modern Slavery to our staff and suppliers whilst monitoring compliance in our supply chains through increased site presence by our Sustainability Managers. Greater scrutiny of ethical and 'collaborative action required' audit non-conformances, preventative and corrective actions will continue to happen, this will contribute to our risk assessment and subsequent action plan.

Chief Executive: Jonathan Tremayne

Signature:

A handwritten signature in black ink, appearing to read "Jonathan Tremayne".

Date: 3<sup>rd</sup> February 2025