

Modern Slavery Statement

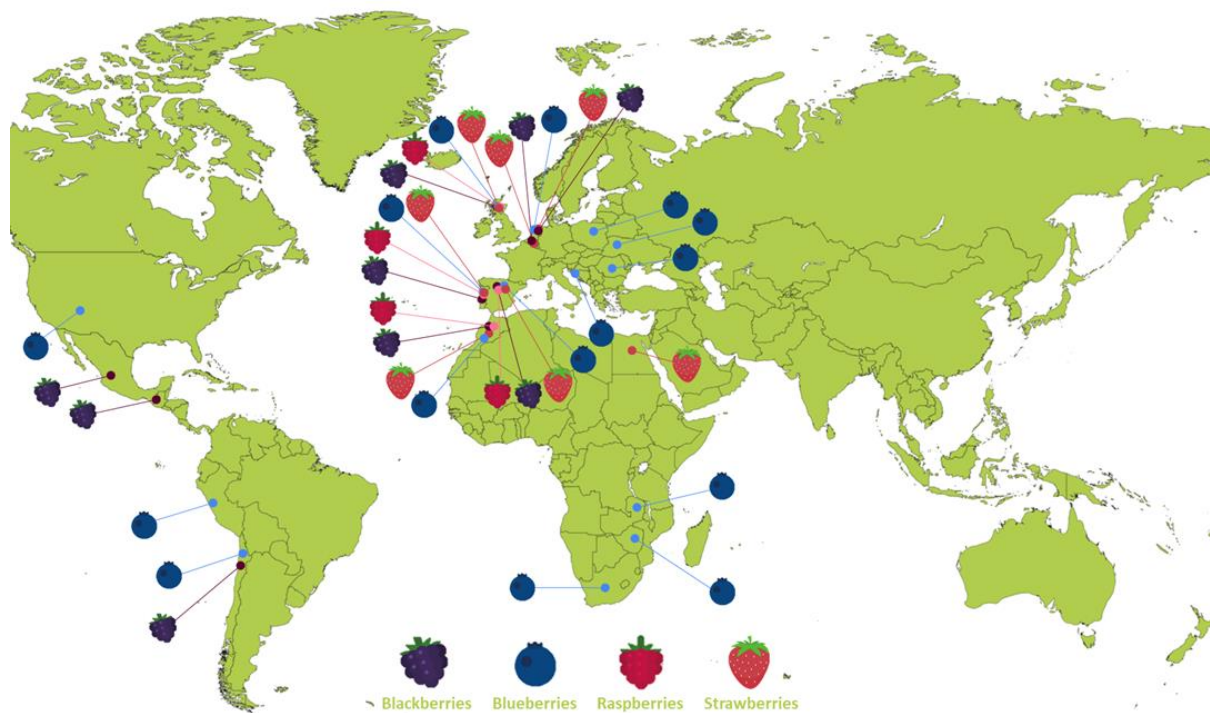
Published in accordance with section 54(1) of the Modern Slavery Act 2015. Our statement outlines the steps that we have taken during 2024/25 towards implementing our zero-tolerance approach to slavery and human trafficking.

Our business and supply chains

Angus Soft Fruits Limited is a leading supplier of berries to UK and European retailers, food services and wholesalers. We breed, grow, source from around the world and pack berries to ensure consistent supply of the best tasting fruit for our customers.

Our group has a turnover of £153 million, employs over 200 people operating in the UK, Netherlands, Spain, Morocco and Chile.

We work with more than 100 suppliers in 21 different countries in Europe, Africa and Central and South America. Our supply chain varies from single tier to more complex multi-tiered suppliers.



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Our Values



Our values underpin everything we do.

Accountability for addressing human rights risks, including modern slavery and human trafficking, within the Angus Soft Fruits group and our supply chain lies with our Managing Director.

Our Head of People and Head of Quality and Compliance are responsible for developing and overseeing the implementation of our ethical trade and human rights strategy supported by our multi-functional Working Group and in country Berry Integrity Team.



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Our policies

We actively promote and respect human rights within our business through several policies, procedures and processes. These include:

- Acceptable Workplace Behaviour
- Anti-bribery and Corruption
- Corrective Action Procedure
- Ethical Trade and Human Rights
- Equality and Diversity
- Grievance
- Labour Provider Service Level Agreement
- Modern Slavery Response Procedure
- No Child Labour Policy
- Preventing and Managing Risks of Hidden Labour Exploitation
- Recruitment and Selection; particularly our eligibility to work process which ensures that every employee has a legal right to work in the UK and mitigates against the risk of human trafficking
- Remediation Policy
- Responsible Recruitment Policy
- UNGP Reporting Framework
- Whistleblowing Policy
- Working Time Policy

Our Ethical Trade and Human Rights policy, reviewed on an annual basis, is based on the principles of the ILO, (International Labour Organisation) and ETI, (Ethical Trade Initiative) Base Code.

Policies and processes reflect our commitment to mitigating human rights risks and remediation of any adverse impacts that our business has caused or contributed to. We regularly update policies and processes to incorporate improvements recommended through monitoring implementation and/or legal/industry-wide amendments.

We conduct our business in an ethical manner that focuses on human rights related to the provision of labour and working conditions throughout our supply chain, ensuring that people are treated fairly and that their human rights are protected and respected. This includes rights to fair pay, safe working conditions and protection from modern slavery. We do this through mapping the provision of labour through our supply chain to identify how workers are recruited, transit countries of migrant workers and labour providers.

We seek to develop long term relationships with those businesses that share our ethical standards and are dedicated to working within the remit of this policy.

Assessing and Managing Risk

Due to the spread and complexity of own operations and supply chain, the risk of modern slavery is segmented into three: low, medium and high based on a number of critical factors including but not limited to known country ethical risks, commercial volume and labour criteria.



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Various research tools such as Food Network for Ethical Trade (FNET) are also used to support a robust process.

Within our own operations we have identified our packhouse to have the highest risk of human exploitation due to the use of agency workers and employment of non-UK employees. To mitigate against these risks we ensure implementation of labour provider audits, welfare chats, improved recruitment and onboarding processes, and modern slavery awareness training.

Within our supply chain, we have identified the following as our salient human rights risks:

- accommodation issues for workers across our supply chain
- illegal recruitment fees
- responsible recruitment

To mitigate against these risks we have:

- developed an accommodation checklist which are auditing against
- raising awareness and delivering training to our suppliers
- mapping supply of labour and raising awareness.

Due Diligence

We require all our fruit growers, and encourage our other suppliers, to be members of SEDEX, (the Supplier Ethical Data Exchange), maintain their SAQ, (Self-Assessment Questionnaire), and to undertake an ethical audit based on risk, ideally a SMETA audit within an agreed timeframe by an approved third-party auditor.

Incorporated into our initiatives to identify and address risks of modern slavery are systems that:

- Develop, implement and train out relevant policies and procedures in our own operations and supply chain
- Embed responsible recruitment practices within our own business and supply chain
- Improve awareness and understanding of modern slavery to enable identification of any modern slavery cases
- Embed worker voice channels in our own business and supply chain for example “Tell ASF”
- Enable an effective response to any suspected cases to protect victims
- Collaboration with the Gangmasters and Labour Abuse Authority, (GLAA) when suspecting potential human exploitation
- Follow up and monitoring of implementation of remedy
- Improve auditing, identification, and mitigation of risk amongst our labour providers, including agency worker interviews
- Regular review of our human rights’ due diligence risk assessment to better identify and manage risks of modern slavery in our supply chain



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- Identify and assess Base Code non-conformances through audit of labour providers and interviewing workers in our own operations and supply chain
- Mitigate the risk of slavery, human trafficking, and other Base Code non-conformances by working with suppliers on CAPs, (Corrective Action Plans)
- Monitor potential risk areas in our supply chain through dialogue with our suppliers to understand the root causes and agree a course of action to resolve them; development and accessibility to bespoke learning interventions, the use of CAPs and follow up visits
- Protect whistleblowers

We are proactive members of relevant forums such as and FNET, (Food Network for Ethical Trade) and continue to sponsor the Spanish Ethical Forum, in which our key Spanish suppliers participate.

Monitoring and Reporting

Our multi-functional Working Group is reviewed to ensure fitness for purpose in driving our progress against ethical trading KPIs and our ethical trade objectives. We are completing the Stronger Together direct reporting tool on an annual basis to also measure our progress against our ethical trading action plan, assess our human rights due diligence approach and benchmark ourselves against our peers.

We continue to maintain external recognition of our commitment to proactively tackle labour exploitation in our supply chain by our Stronger Together Business Partner Advanced status.

Dedicated to building long term supplier relationships, we seek to influence commitment to ethical trading practices and increase transparency in our supply chain.

We also continue to monitor and report our progress against each of the United Nations Guiding Principles Reporting Framework.

Training

To maintain awareness and help us to prevent modern slavery or any human rights abuse, our employees have completed various learning interventions provided through Stronger Together, Responsible Recruitment Toolkit in addition to developing our on bespoke company resources. Training is targeted dependent on the role for example, packhouse management have recently received training provided on site by our local GLAA to ensure awareness and understanding of our modern slavery response procedure.

Training content is regularly reviewed to ensure content is current and fully understood, measured by knowledge checks at the end of the course and a review of implementation.

Further steps

To enhance our approach to tackling modern slavery within our business and our supply chain, we will:

- Continuously improve our policies and practices
- Further develop our training interventions to raise awareness within our business and our supply chain
- Further develop stakeholder relationships



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- Strive to achieve our ethical trading KPIs outlined in our action plan
- Continue to map of our supply chain, incorporating our non-food providers
- Continue to embed worker voice into our due diligence processes
- Strive to remove worker paid recruitment fees from our supply chain

John Gray
Managing Director

