



MODERN SLAVERY ACT – The Summer Berry Company (UK)

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2022/2023

Introduction

This statement sets out The Summer Berry Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 01 April 2022 to 31 March 2023.

As part of the soft berry sector & within the wider agriculture industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate and operational activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of TSBC:

- The Summer Berry Company (UK) is based in West Sussex and is a leading UK grower and supplier of strawberries, raspberries, blackberries and blueberries. Over 1000 people are employed and accommodated on our farms near Chichester. We also operate a state-of-the-art cool chain, controlled atmosphere storage and logistics operation. We pack all of our own soft fruit, together with some from other UK growers.
- We also operate in Portugal; where we grow and supply raspberries and blueberries. Around 800 people are employed and accommodated at our farm in the Alentejo region.

Our organisation understands that the agriculture industry is a high-risk sector for modern slavery and human trafficking and we take those risks seriously.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Employing and accommodating seasonal migrant workers
- Reliance on Labour Providers and their supply chain
- Employing and accommodating a large number of workers

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

Policies: The Director of People & Culture is responsible for the development of the following initiatives:

- **Risk assessments:** pre-employment checks and audits of our labour supply chain
- **Investigations/due diligence:** The People & Culture Director responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking
- **Training:** Regular training is provided to our People & Culture team as well as leaders & managers with teams of people where the risk of modern slavery is higher, ie. our seasonal workers teams

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** We are committed to ensuring that our labour suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions.

However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

- **Agency workers policy** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Training

We require all leaders working in our teams with general workers and our people professionals within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by sharing information to staff and putting up posters across our premises.

The information explains to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Executive Team approval

This statement was approved on 01 August 2023 by our People & Culture Director, who reviews and updates it annually.

A handwritten signature in black ink, appearing to read 'H Wilson', with a long, sweeping underline.

Helen Wilson
Director of People & Culture