



MODERN SLAVERY ACT – The Summer Berry Company (UK)

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2023/2024

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 2023 to 31 March 2024.

As part of the agricultural sector, 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 The Summer Berry Company:

- TSBC is a berry producer with farms near Chichester in the UK and in the Alentejo region of Portugal. We grow, harvest, pack and transport berries to our customers across the UK, Europe and Middle East.

Countries of operation and supply

We currently operate in the UK and Portugal.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- We partner with employment agencies who have a proven track record of high welfare and ethical standard
- We are regularly audited and have successfully passed Smeta audits in the UK and in Portugal
- In the UK we are a Stronger Together partner
- In the UK we use a third party accredited auditor to audit our labour provider suppliers
- In Portugal we use an employment lawyer to audit the recruitment agencies we work with

High-risk activities

We consider the recruitment of seasonal labour to be an activity considered to be at high risk of slavery or human trafficking:

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The People & Culture teams in each country (UK and Portugal) annually review policies and ensure they are updated and any amendments are rolled-out into active processes
- **Investigations/due diligence:** The People & Culture teams in each country (UK and Portugal) are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** In the UK we hold regular training delivered by 'Stronger Together' organisation

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 use our confidential helpline/complete our confidential disclosure form via a QR code.
- **Employee code of conduct** Our code makes clear to employees & workers 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 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.

- **Recruitment/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.

Due diligence

TSBC undertakes due diligence when considering taking on new suppliers, specifically with regard to labour suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- auditing of any new labour supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting labour supplier audits or assessments through a third-party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard labour suppliers' practices, including providing advice to suppliers through third party auditor and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular such as participation in "Stronger together";
- using Smeta, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Training

We require staff working in the UK with people management roles within our organisation to complete training on modern slavery and the People & Culture team in Portugal to have training on human rights & ethics.

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 putting up posters across our premises and circulating a series of emails & communications within company-wide meetings and newsletters.

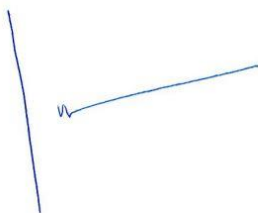
Executive Team approval

This statement was approved on 01 August 2024 by our People & Culture Director, who reviews and updates it annually.

People & Culture Director's signature:

A handwritten signature in black ink, appearing to read 'H. Wilson', written in a cursive style.

CEO's signature:

A handwritten signature in blue ink, consisting of a vertical line on the left and a horizontal line extending to the right, with a small mark at the junction.