

### **3.24 Winterwood Farms Limited Modern Slavery & Human Trafficking Statement for Financial Year 2023/24**

**Issue 7**

This statement is made according to section 54 of the Modern Slavery Act 2015. It sets out the steps that Winterwood Farms Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking, and forced labour. Winterwood Farms Limited has a zero-tolerance approach to any form of modern slavery which is shared on our website. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery within the business or our supply chain.

#### **Our business and supply chain**

Winterwood Farms Limited produces a wide range of fruit from our farms in the United Kingdom, Poland, and South Africa, with nearly 2,000 hectares of combined cropping area. Our farms allow us to be one of the largest growers of Blueberries in Europe and Southern Africa.

Alongside our farming operations, we also pack fruits from around the world at our packhouse in the UK. These fruits are mostly marketed to various retailers and supermarkets in the UK.

We purchase all our fruit from the farms on which they are grown, from our farms, or through reputable marketing agents. We have very close, successful and long-term relationships with all our major suppliers.

#### **Policies**

The Company operates several internal policies to ensure that business is conducted ethically and transparently. These include:

1. Ethical Trading Policy: The company is committed to ethical trading. In addition, a program of external ethical auditing is in place including publishing the results of third-party audits on [SEDEX](#) (Supplier Ethical Data Exchange) website.
2. Worker Welfare Policy: The company has a duty of care to all its employees. The company conducts an extensive induction programme before employees commence work which covers Health and Safety, job descriptions, pay, and training.
3. Bribery and Corruption Policy: The Company prohibits bribery or corruption in any form whether direct or indirect.
4. Human Rights Policy: The company has a human rights policy covering employment, harassment, discrimination, accommodation, harassment in accommodation, violation of the human rights policy, and consequences.
5. Confidential Whistleblowing Policy: The company has a confidential whistleblowing policy designed to make disclosures without fear of retribution.
6. Equality, Diversity & Inclusion Policy: The company has a policy not to discriminate against people and provides equal opportunities to all.
7. Forced Labour Policy: The company has a policy against all forms of forced labour which covers prison labour, bonded labour, coercion, and child labour.
8. Recruitment Policy: This defines the processes by which the company recruits and selects its employees.
9. Remediation and Grievance Policy: The company has a policy on the reporting and remediation of negative impacts on human rights caused by its operation and supply chain.

#### **Risk Assessment**

Winterwood Farms Limited has risk-assessed our fruit suppliers. This understanding has allowed the company to evaluate specific labour risks by country that embody wherever relevant the chance of forced labour.

To help with maintaining the risk assessment, Winterwood Farms Limited currently monitors its suppliers' packhouses and farms via SEDEX. Using SEDEX and the transparency provided by the platform, we can monitor the c5000 workers within our supply chain.

### **Due diligence**

All employees at Winterwood Farms Limited's farm and packhouse in the United Kingdom are given a written contract of employment at the start of their employment.

Winterwood Farms Limited have continued using the 'Pro-Force' agency to provide staff to help with any labour shortages. [Pro-Force](#) is a registered GLAA labour provider and follows best practice guidance for ILO, ETI, and GLAA licensing standards. [Pro-Force](#) is a [Stronger2gether](#) business partner and is actively involved in modern slavery initiatives. Winterwood Farms Limited conducts modern slavery questionnaires 1 on 1 on all agency workers during induction to look for signs of modern slavery and also conducts an annual audit on [Pro-Force](#).

In 2023 Winterwood Farms Limited used a company called AGRI-HR, a registered GLAA labour provider, to provide workers from the season agricultural worker scheme (SAWS).

In 2023 Pro-Force were the first SAWS scheme operator to complete the Stronger2gether Responsible Recruitment Progress Assessment audit process. The audit confirmed Pro-Force's Responsible Recruitment Toolkit (RRT) self-assessment score of 97%. Elements of operations that were assessed included no forced labour and no child labour. AGRI-HR are also currently undergoing the assessment and audit with results due to be published in June/July 2024.

Winterwood Farms Limited recognises there is scope in our supply chain for slavery and human trafficking to occur. Winterwood Farms Limited operates a supplier approval procedure for our fruit suppliers and maintains a preferred supplier list.

We conduct due diligence on all potential suppliers before allowing them to become a supplier. The company requires all fruit suppliers to register on [SEDEX](#) (or with [SIZA](#) for South Africa) and complete the self-assessment questionnaire (SAQ). The company assesses compliance to national and international standards, through second-party auditing and third-party auditing to [SMETA](#) protocol. Suppliers are required to operate according to the Ethical Trading Initiative (ETI) principles which the company offers support where needed.

### **Training and Awareness**

Key members of staff have attended the [Stronger2gether](#) workshop to understand the signs of modern slavery and what to do if they suspect that it is taking place within our business or supply chain. Staff that conduct inductions and interviews have completed the [Stronger2gether](#) trafficking and modern slavery e-training course. During induction, new staff are made aware of modern slavery using resources provided by [Stronger2gether](#). A modern slavery questionnaire is completed during induction 1 on 1 with the new employee in the employees' language. The modern slavery questionnaire is conducted by our trained inductors who are trained to spot signs of modern slavery. This year we increased the number of staff attending Stronger2gether training, 5 new staff members have completed the [Stronger2gether](#) e-training course. A total of 18 staff have attended [Stronger2gether](#) training as of the end of April 2024.

Awareness will be raised through posters and visual prompts in our employee areas.

### **Our progress**

Winterwood Farms Limited will continue to work on the objective set going forward.

### **Our plans**

Winterwood Farms Limited has defined targets in this statement to complete for the coming financial year.

**Our policies:** Continue to review and develop our current policies in line with emerging modern slavery and human trafficking issues.

**Training and awareness:** Further increase the number of staff who attend [Stronger2gether](#) training.

**Risk Assessment:** Continue to refine and develop our fruit supplier modern slavery risk assessment. The company will also continue to engage with its suppliers of goods for resale on modern slavery and human trafficking risks within the supply chain.

**Board approval for this statement**

This statement is made according to section 54(1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the financial year ending 30/04/24. This statement has been approved by the board of directors.

Name: Stephen Taylor (Managing Director)

Date: 16/07/24