



Slavery and Human Trafficking Statement - 2017

Vitacress is one of Europe's leading growers and packers of watercress, leafy salads, spinach, and fresh herbs. We have operations in the United Kingdom, Portugal, Spain and Benelux.

Our suppliers operate in Benelux, China, Denmark, Estonia, Ethiopia, France, Germany, Holland, Ireland, Israel, Italy, Japan, Jordan, Kenya, Morocco, Portugal, South Africa, Spain, Sweden, Thailand, United Kingdom, and United States.

Vitacress UK is committed to:-

- Eradicating child labour, forced labour, slavery or human trafficking if it is present in any of our businesses and/or their respective supply chains
- Ensuring that any issues/concerns about child labour, forced labour, slavery or human trafficking can be raised through our grievance and/or whistleblowing policies and procedures
- Carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage or National Living Wage and have the right to work in the United Kingdom
- Ensuring our suppliers operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- Ensuring that all suppliers understand that they must operate in accordance with the principles contained in the Vitacress Supplier Code of Conduct, which endorses the requirements of the Modern Slavery Act 2015, as this is a condition of supply
- Making certain that suppliers have transparency, remedy any shortcomings and drive continuous improvement
- Appointing a named individual to oversee the compliance with the Modern Slavery Act 2015. This person is Vitacress Chief Executive Officer. There are a number of Directors also responsible as follows:-
 - Farms and Procurement Director responsible for leaf, veg and herb raw material supply chain risk assessment
 - Group Finance Director responsible for procurement of non-raw material supply chain risk assessment
 - Managing Directors of UK Herbs, UK Salads and Portugal Business Units responsible for ensuring their Senior Management team drive compliance to ensure their business and supply chains are slavery free
- Identifying and addressing any areas of high risk in our supply chain
- Providing training for all employees who are involved in the supply chain on issues relating to child labour, forced labour, slavery or human trafficking
- Confirming that all new employees receive an induction during which, the Stronger Together stance we have adopted on being free from involvement with any form of child labour, forced labour, slavery or human trafficking is ardently promulgated
- Labour providers attending a training session conducted by Vitacress on the Stronger Together initiative and our expectations of them in compliance
- Recruiter compliance training which ensures that both Vitacress employees and labour provider employees involved in the recruitment process have been trained to the required standard

- Ensuring that the topic of modern slavery is an agenda item which is discussed at the Vitacress BIG forum meetings. The BIG forum is a communication platform which comprises representatives from the wider workforce. It meets on a regular basis to discuss any issues affecting the wider workforce
- Senior HR professionals attending external workshops on the Stronger Together initiative
- Responsible employees attending external workshops on the topic of risk assessment of the supply chain, conducted under the Stronger Together initiative

We have a number of policies and codes relating to and supporting our vehement opposition to and determination to drive out child labour, forced labour, slavery or human trafficking.

Verification

Vitacress has performed assessments of many of its potential suppliers to identify any issues with its suppliers' ability to achieve compliance with the Supplier Code of Conduct and Supplier Technical Warranty. Vitacress performs this assessment internally as part of its authorisation process, using the Sedex platform and Verisoft Maplecroft application for supply chain risk assessment. Becoming a supplier in the Vitacress supply chain is conditional upon the Vitacress Supplier Code of Conduct and Supplier Technical Warranty being fulfilled and renewed annually.

Vitacress has Service Level Agreements (SLAs) which define the code of conduct to be adopted by potential labour providers and becoming a labour provider is conditional in fulfilling these terms. Labour providers must also achieve compliance with the Supplier Code of Conduct.

Auditing

In addition to the verification process, Vitacress reserves the right to conduct both announced and unannounced audits of the internal operations of our own business (including factories, farms and accommodation inspections and audits), our suppliers and our labour providers to ensure the continuing compliance with the requirements of all laws, standards, regulations and codes of practice, including the prohibition against child labour, forced labour, slavery or human trafficking. Our accommodations are audited.

Vitacress is registered on Supplier Ethical Data Exchange (SEDEX) as are all of our suppliers. Vitacress (Vitacress Salads, Vitacress Herbs, Vitacress Portugal, Vitacress Espana, and Vitacress Real) is also Sedex Members Ethical Trade Audited (SMETA) by an external agency to ensure that Vitacress achieves the standards as laid down in the ETI Base Code. Farm suppliers complete and continually review a self-assessment questionnaire. All of our labour providers in the UK are registered on the Gangmasters Licensing Authority (GLA) and Vitacress is subscribed to the Active Check and the information updates services which the GLA provides.

Vitacress has implemented the Stronger Together programme and trains all employees in this comprehensive initiative about slavery and human trafficking.

Toby Brinsmead
Chief Executive Officer – Vitacress March 2017