



Vitacress Slavery and Human Trafficking Statement – 2020

Introduction

Vitacress is one of Europe's leading growers and packers of watercress, leafy salads, spinach and fresh herbs. Our goal is to provide the freshest, tastiest, healthiest and most exciting produce throughout the year. To do this, we have our own farms, and work with suppliers both in the UK and globally to source produce, packaging and other materials. We have operations in the United Kingdom, Portugal, Spain and Benelux, and employ 1,500 people.

Everything we do at Vitacress is underpinned by our values:

- One team, one goal:** Everyone understands their role, is listened to, supported and can challenge constructively.
- Pioneering:** Constantly innovating in all our activities and we celebrate getting there first.
- Be trusted:** We are accountable for our actions and deliver on our promises.
- We care:** We make decisions for sustainable growth and are determined to leave things better than we found them.

We pride ourselves on being a trusted and ethically responsible business for all who work with us and for us.

Vitacress is fully committed to tackling modern slavery and hidden exploitation. With over 40 million people trapped in forced labour and human trafficking globally, it is critical that we identify and address any risks within our business to protect people, wherever they are in our operations or supply chains.

Vitacress will ensure compliance to the Modern Slavery Act 2015 to make sure the business and supply chains are slavery free.

We do not tolerate any form of human rights abuse within our company or within our supply chains, therefore Vitacress has adopted a governance approach to Modern Slavery. The CEO, Toby Brinsmead, has been appointed as the named individual tasked with overseeing compliance with the Modern Slavery Act 2015 and will be supported by the Vitacress Operating Board members, each of whom has a specific responsibility as follows: -

- Group Technical Director, responsible for leading the modern slavery agenda.
- Growing and Procurement Director, responsible for leaf, vegetable and herb raw material supply chain risk assessment.
- Group Finance Director, responsible for non-raw material supply chain risk assessment.
- Group Human Resources Director, responsible for human resource policy compliance and the on-going people training plans.
- Managing Directors of each Business Unit with their respective Head of Human Resources are responsible for ensuring their senior leadership team drive compliance to ensure their business unit and supply chains are slavery free.

This is Vitacress' fourth Modern Slavery Statement. The links below refer to the previous annual statements.

- [Vitacress Slavery and Human Trafficking Statement - 2019](#)
- [Vitacress Slavery and Human Trafficking Statement - 2018](#)
- [Vitacress Slavery and Human Trafficking Statement - 2017](#)

Progress in 2020

Whilst much of the focus throughout 2020 has been dealing with challenges presented by the Coronavirus pandemic, Vitacress has worked to progress many of the areas identified in the 2019 Modern Slavery Statement. However, restrictions in travel have stalled the plans to roll out some of the initiatives planned in 2019 to Vitacress operations in Europe. Changing ways of working in response to the restrictions has enabled many of the actions (detailed below) to be completed. Conditions allowing, the work to develop Modern Slavery risk management and due diligence systems will push forward in 2021.

- During 2019 Vitacress worked with Ardea International to analyse gaps in business policies and procedures, details of which can be found in the 2019 statement. Ardea International are a specialist consultancy with expertise in human rights and Modern Slavery risk. Two workshops were developed from this analysis and undertaken in 2020, addressing gaps and aligning the approach taken by Vitacress across the UK and Europe. The workshops involved those with responsibilities for senior leadership, procurement, recruitment and training.
- Vitacress' Supplier Code of Conduct was updated to accommodate requirements for the business' operations in Europe and rolled out across the supply base.
- Implementation of a controlled programme to ensure the Supplier Code of Conduct is agreed and in place across all legacy suppliers commenced with results registered within the ERP system to allow tracking and traceability within the UK and Portuguese manufacturing sites.
- Identification of the resources for Stronger Together partnership in Spain. Preparation and support were in place for Vitacress Espana for their first SEDEX Members Ethical Trading Audit (conducted in January 2021).
- Modern Slavery and Human Trafficking was added as a separately considered risk in the Vitacress Risk Register.
- Adaptation of audits for high-risk suppliers (particularly labour providers) with new methodology was developed during travel restrictions because of the Coronavirus pandemic (UK).
- Risk assessment reporting tools and techniques to monitor results from the new SEDEX self-assessment questionnaires were developed. (UK)

1. Organisational Structure

Vitacress is a European wide business that has a variety of farming and manufacturing sites across several countries.

In the UK, Vitacress has two manufacturing sites, supported by two leaf farms and four watercress production areas.

Outside the UK, Vitacress has manufacturing sites in Portugal and the Netherlands, two farming areas in Portugal and one farm in Spain.

Business Supply Chains

Vitacress is committed to the highest standards of ethical conduct and social and environmental responsibility. Vitacress requires suppliers to operate in accordance with the principles of its Supplier Code of Conduct and in full compliance with all applicable laws, regulations and codes within their countries of operation and internationally. Our Supplier Code of Conduct highlights the minimum requirements expected of a supplier to Vitacress and as such may be augmented by the law and by higher standards of expectations as set out in any contract between a supplier and Vitacress. As noted above, the Supplier Code of Conduct was reviewed and updated in 2020.

UK

Vitacress' Purchasing Policy also provides clear guidelines, committing every individual involved in purchasing and supply management processes to use their best endeavours to ensure that our purchasing and contracting activities are aligned with our Modern Slavery and Human Trafficking Statement.

Europe

The Vitacress Supplier Code of Conduct is used across all Vitacress manufacturing companies in Europe together with procurement/purchasing policies that cover local requirements.

Geographic Sources (All Vitacress locations)

Vitacress sources both raw material and non-raw materials from around the world. The supply base currently covers the following countries:

Australia, Belgium, Brazil, China, Cyprus, Czech Republic, Denmark, Estonia, Ethiopia, France, Germany, Greece, Hungary, India, Ireland, Israel, Italy, Japan, Jordan, Kenya, Lithuania, Morocco, Netherlands, Poland, Portugal, Senegal, Slovakia, South Africa, Spain, Sweden, Thailand, United Arab Emirates, United Kingdom and United States of America.

2. Policies in relation to Modern Slavery

UK

Our policies and codes of practice support our vehement opposition and determination to drive out child labour, forced labour, slavery and human trafficking. Some of these are reviewed every year by our legal advisors to ensure they are up to date and compliant. We also monitor them on an ongoing basis to make sure they remain relevant and take into consideration best practice.

Policies

- Modern Slavery
- Preventing Hidden Labour Exploitation
- Agency Labour Provider
- Human Rights - Equal Opportunities and Dignity at Work
- Young Person and Child Worker
- Grievance
- Whistleblowing
- Recruitment
- Stronger Together
- Anti-Bribery
- Group Purchasing Policy

Codes of Practice

- Employee Code of Conduct
- Supplier Code of Conduct

Europe

Vitacress Portugal and Vitacress Real both have employee handbooks that cover the following:

- Employee Code of Conduct
- Whistleblowing
- Recruitment
- Grievance
- Anti-Bribery
- Equal Opportunities

Vitacress Espana has translated and adopted the policies and procedures from the UK and uses a local independent labour law expert for handling any issues that arise.

3. Due Diligence

Vitacress Operations (All locations)

Vitacress SMETA Audit Status

All Vitacress sites are registered on SEDEX, and the manufacturing sites are SMETA audited. The UK sites are due their re-audit, and Vitacress Espana is due a first audit in 2021.

UK

We have continued to work with a live ethical risk assessment tool in collaboration with the Supplier Ethical Data Exchange (SEDEX), which is reviewed monthly across the manufacturing sites. This tool uses a Red/Amber/Green (RAG) rating for the programmed supply base of grown raw materials sourced from around the world. Other suppliers of ingredients, packaging and services are also registered on SEDEX where appropriate. Any supplier with red status will be investigated and the resulting outcome will determine any actions necessary to resolve the issue. Completion of the new self-assessment has helped identification of suppliers requiring further investigation.

Verification

Raw material, ingredient and packaging suppliers are subject to annual assessments for compliance to the Supplier Code of Conduct (SCC) and the Technical warranty pack. All suppliers in these categories are registered on the SEDEX platform for UK supply and the ongoing use of the RADAR tool helps assess the supply chain risk. Becoming a programmed raw material or ingredient supplier is conditional on fulfilling the requirements of the SCC, Technical Warranty and SEDEX registration.

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 on fulfilling these terms. Labour providers must also achieve compliance with the Supplier Code of Conduct. All labour providers are registered on SEDEX and have completed the self-assessment questionnaire (SAQ).

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 continuing compliance.

During 2020, travel restrictions affected the auditing schedule, and different methods have been developed to continue auditing high risk suppliers (for example labour providers). All labour providers were audited to schedule in 2020.

Europe

Vitacress Portugal uses the SEDEX platform and GLOBALG.A.P Risk Assessment on Social Practice (GRASP) to assess raw material, ingredients and packaging supply, together with the Supplier Code of Conduct and technical requirements. Raw material and ingredient suppliers are subject to annual audits. The Supplier Code of Conduct is being rolled out to all suppliers.

Vitacress Real have adopted the Supplier Code of Conduct across all raw material supply and require GRASP certification where applicable to assess suppliers. In the Netherlands, labour agencies are affiliated to the ABU (General Federation Temporary Employment Agencies). Vitacress Real's requirement for labour providers is membership of the ABU, which ensures compliance with appropriate laws and regulations, and is subject to an annual audit.

Vitacress Espana have a very small number of suppliers and use both the Supplier Code of Conduct and GRASP where appropriate.

4. Risk Assessment and Management

UK

Working within the frameworks of our policies and codes of practice enables the business to carry out due diligence and manage risk through communications and supplier relationships.

Raw material sourcing can include countries that are classified as high risk in terms of human rights abuse. When sourcing from these geographies, programmed suppliers will have a SEDEX Members Ethical Trade Audit (SMETA), undertaken by an approved independent audit body. Non-conformances identified in any audit must be closed off in the agreed time. Throughout 2020, Vitacress has continued this approach to risk management.

Adopting a risk-based approach to the supply base Vitacress uses a framework of controls to provide assurance on the suitability of programmed suppliers and prioritises critical areas. Vitacress places emphasis on SEDEX with an objective of 100% compliance to this standard across our supply chain partners, complemented by our Supplier Code of Conduct, which is mandatory for all new suppliers. Finally, there is the Technical Warranty pack which must be fully completed for specified goods such as raw material, ingredients and packaging.

For other areas of procurement, the Transparency in Supply Chain (TISC) report is used to identify at risk suppliers. All Vitacress' suppliers are expected to adhere to the values and commitments within the Supplier Code of Conduct. All new suppliers are expected to sign up to the code as part of the new business agreement.

Industry intelligence is widely used across the business to understand inherent risks within our supply chain such as Stronger Together communications and the ALP monthly newsletter.

Europe

The intention at the start of 2020 was to improve the approach to risk management within European operations. However, the onset of the pandemic restricted movement between countries, and hampered activities that required audit and understanding of the risks at source. Conditions allowing, focus for 2021 will be on the approach to risk management and mitigation using best practice learned in the UK for application in European operations.

5. Key Performance Indicators

The following KPIs are discussed and updated monthly by each Vitacress business unit:

- Number of suppliers registered on SEDEX and status (red, amber, green), or GRASP registration details.
- Number of suppliers signing the Supplier Code of Conduct.
- Any whistleblowing incidents or activity such as clandestine entry.
- Audit results.

On an annual basis from 2021, the results of the Stronger Together progressing tool will be utilised to measure Vitacress' progress (within the UK only).

6. Training and Raising Awareness (UK)

Travel restrictions challenged face to face training during 2020. The rise in use of webinar training sessions has enabled Vitacress to continue the focus on the importance of identifying Modern Slavery in supply chains and operations. Courses and webinars are detailed below:

Course	Internal/External Provider	No. Employees
Purchasing Practices	External Stronger Together	3 x Procurement
Tackling Modern Day Slavery	External Stronger Together	6 x Human Resources
Tackling Modern Day Slavery - Guidance and Worker Induction for Farm Managers	Internal	13 x Production Team
Advanced Modern-Day Slavery	External Stronger Together	1 x Human Resources
Employee Inductions	Internal	276 x Employees
Employee Refresher Induction	Internal	83 x Employees
Tackling Modern Day Slavery for Managers	Internal	30 Managers
Modern Slavery Risk workshop	External Ardea International	17 Senior managers across all businesses and functions

Webinars	Internal/External Provider	No. Employees
Managing Labour Responsibility	External ALP/Stronger Together	2 x Human Resources
Everyone can play a role in raising Awareness of Modern Slavery around your Business	External Stronger Together	2 x Human Resources
Effectively Sourcing and Retaining Workers	External ALP	2 x Human Resources
Mitigating Modern Slavery in Risks Inn Labour Providers.	External ALP	2 x Human Resources 1 x Manager
Get Ready for Brexit - Immigration from 2021 and Beyond	External ALP	2 x Human Resources

Company Communications

To ensure that modern slavery is foremost in everyone's mind there are various forums through which we constantly review any issues, the risks and due diligence measures around the subject.

The Vitacress Operating Board meets monthly and discusses Modern Slavery KPIs as part of the Company governance agenda (all business areas).

Each business unit reviews Modern Slavery measures and KPIs with the senior management team monthly (UK and Portugal manufacturing sites).

Modern Slavery is an agenda item on the monthly Group HR meeting (UK and Portugal).

Modern Slavery is an agenda item on the bi-monthly Business Involvement Groups (BIG), which have cross business worker representation (UK).

Vitacress UK also makes available an employee assistance programme (through Aviva), whereby anyone can email or phone the free 24-hour confidential help line for support and advice. The phone numbers are displayed on all company notice boards and the company intranet (UK).

Areas of focus for 2021

- Continue the focus on the Supplier Code of Conduct, extending this to include more legacy suppliers.
- Utilisation of the new SEDEX Forced Labour Indicator tool. Launched in May 2021, this tool will help identify not only countries with inherent risk, but businesses whose audit scores show them to have potential forced labour indicators.
- Widen the use of SEDEX throughout the business as a management tool for supplier assessment.
- Inclusion of the Stronger Together Advanced Business Partner progressing tool as part of the Vitacress Modern Slavery KPIs (UK only).
- Devise and roll out a standard list of questions regarding Modern Slavery risks for supplier visits and audits for use by Procurement, Technical and other relevant teams.
- Assessment of the use of Stronger Together principles in our businesses in Spain and Portugal, with the initial focus on training and awareness.
- Greater focus and in-depth scrutiny for higher risk areas of supply. These will include labour provision, third party raw material supply and providers of personal protective equipment (UK).
- Scheduled company-wide employee survey.

Training Focus for 2021 (UK)

- Tackling Modern Slavery in UK Businesses – Bespoke course for Directors, Senior management.
- Tackling Modern Slavery Through Purchasing Practices - External course for the Procurement team.
- Tackling Modern Slavery in Global Supply Chain – External course for Technical Managers and Auditors.
- Introduction to Modern Slavery - Induction -for all employees and refresher training for existing employees.
- Tackling Modern Slavery E-Learning to include Compliance Recruiter Principles – Internal for Managers and Supervisors throughout the business.

New Training Initiatives:

- Modern Slavery Champion Training – Internal for the UK businesses.
- Best Practice for Handling of Suspected or Reported Cases of Forced Labour in Handling – External for the HR Teams.

Training Focus for 2021 (Europe)

The plans for both Vitacress Portugal and Vitacress Real will be use of Stronger Together initiatives and available training courses to strengthen the understanding of Modern Slavery in operations and supply chains.

Commitment

Across all our businesses we will continue to add new initiatives, processes and partnerships to reduce the risks of slavery and human trafficking. We will keep this subject a talking point in all parts of our business – supply chain, employees, shareholders, internal and external stakeholders and the external communities in which we operate.

This statement has been approved by the Board for the Financial Year Ending 31 December 2020.


Toby Brinsmead
Chief Executive Officer


John McManus
Group Human Resources Director


Helen Brierley
Group Technical Director


Ashley Cooper
Group Finance
Director


Kees van Poortvliet
Growing and
Procurement Director


Simon Conway
Managing Director
UK Herbs


Mike Sheldon
Managing Director
UK Salads


Carlos Vicente
Managing Director
Vitacress Portugal

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