



# Modern Slavery Statement

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**2022**



# Modern Slavery Statement

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This statement contains information relating to the measures Vitacress has put in place to understand potential Modern Slavery risks to our business.

As we set ourselves goals on an annual basis, we include an update on progress made throughout the year.

With Advanced Business Partner status, we work with Stronger Together who provide in-depth, specialist advice.

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# Foreword

Vitacress is a leading grower and packer of 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 the Netherlands, and employ 1,652 people.

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.

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 do not tolerate any form of human rights abuse within our Group of companies or supply chains, therefore Vitacress has adopted a governance approach to Modern Slavery.

The CEO, Chris Jinks, has been appointed as the named individual tasked with overseeing compliance and will be supported by the Vitacress Senior Leadership Team members:

- 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 drives compliance to ensure their business unit and supply chains are slavery free

This is Vitacress' sixth Modern Slavery and Human Trafficking Statement. The link below refers to the annual statement for 2021, previous statements are available on our website:

[Vitacress Slavery and Human Trafficking Statement - 2021](#)



# Progress in 2022

The business continued its focus on Modern Slavery and Human Rights due diligence through a challenging year for food manufacturing and significant change within the business. The initiatives progressing throughout 2022 were as follows:

- A company-wide colleague engagement survey was conducted, results assessed, and appropriate action plans put in place where necessary.
- Significant engagement with SEDEX continued in 2022 across HR, Technical and Procurement teams to fully utilise the tools and new developments within the risk assessment platform. Several interactive sessions with SEDEX demonstrated new methodology and information available for supply chain management.
- Continuation of our status as a Stronger Together Advanced Business Partner showing an improvement in business achievement scores year on year.
- Focus across UK sites on SEDEX risk assessment with action plans to help suppliers reduce risk status from high to medium or low categories. Both Vitacress UK manufacturing sites completed significant work in identifying key raw material suppliers to work with to improve risk rating and gain better understanding of SEDEX self assessment.
- Improved auditing of labour providers, with a focus on accommodation standards where provided, including increased auditing and worker welfare interviews.
- A network of expert advisors, industry contacts and local support has been formed to support the business in dealing with any issues arising in relation to Modern Slavery.
- Modern Slavery risks or incidents are reported and discussed at regular monthly meetings across the business to create awareness throughout all departments.

# 1. Our 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 and four watercress farms. 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. Our Supplier Code of Conduct (SCC) 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. During 2022, Vitacress reached the goal for the top 500 suppliers signing and agreeing to our SCC (or their own version of the same) and started the process of renewal for those requiring it. All new suppliers contracted through 2022 signed and agreed as appropriate.

Vitacress' Purchasing Policies also provide 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.

Our purchasing policies and code of conduct have been reviewed during 2022 and remain relevant and appropriate to our operations.

## Geographic sources

Vitacress sources both raw material and non-raw materials from suppliers around the world directly and indirectly.

Suppliers we have a trading relationship with (first tier–direct source) are located in the following countries:

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

In addition, our suppliers also source (second tier) from the following countries:

Argentina, Bulgaria, Chile, Finland, Israel, Japan, Malaysia, Moldova, Pakistan, Romania, Taiwan, Tunisia, Turkey, Slovenia and Sri Lanka.

# 2. Our policies in relation to Modern Slavery - UK

Our policies and codes of practice support Vitacress' opposition to all forms of human rights abuse and take account of local, national and international laws and regulation.

## UK

All policies and codes of practice were reviewed by our legal advisors during 2022 and changes made where relevant to maintain compliance and best practice. Vitacress invested in a new Human Resources Information System (HRIS) in 2020 and implementation of this tool has progressed throughout the year. Moving forward to future years, the HRIS will be the centre point for all employees to access information on Company policy.

### Policies

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

### Codes of Practice

- Employee Code of Conduct
- Supplier Code of Conduct



# 2. Our policies in relation to Modern Slavery - Europe

## **Vitacress Portugal/Vitacress Real (The Netherlands)**

As part of induction, each employee receives the following:

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

In addition, Vitacress Real manages labour provision through the ABU (General Federation Temporary Employment Agencies), which ensures affiliates comply with the law and are subject to annual audits. As required by Dutch law, whistleblowing and grievance procedures are supported by independent counsellors. Vitacress Real has appointed two counsellors as described in the colleague handbook.

## **Vitacress Espana (Spain)**

Our policies and codes of practice in Spain have been translated from the UK versions and adjusted to take account of local law. We work with two local independent labour law experts to ensure compliance.

# 3. Due diligence

## Vitacress SMETA Audit Status (Manufacturing)

All Vitacress sites are registered on the Supplier Ethical Data Exchange platform (SEDEX), and the manufacturing sites have SMETA audits.

## Supplier Due Diligence

The main tool used for ethical risk assessment for UK operations supply is SEDEX. All raw material, ingredients and labour providers are registered on the SEDEX platform together with all UK based packaging suppliers. As such, there is a requirement to complete a self-assessment questionnaire and initiate a trading relationship on the platform with the relevant Vitacress business.

The business units hold a monthly review of registered suppliers using the SEDEX risk assessment tool (RADAR) which highlights the risk category for each registered supplier. Where appropriate, a SMETA audit is required for raw material suppliers classed as high risk or those growing raw material in a country with inherent risk factors. Further spot checks and due diligence is carried out monthly to assess suppliers classed as high or medium risk, and support given to help reduce this risk and to identify areas where action needs to be taken.'

Where suppliers have SMETA audits that require non-conformances closing out, further support and help is provided by Vitacress technical teams when necessary.

Our operations in Europe use several tools to aid ethical assessment, subject to customer requirements, local laws and Vitacress practices. These include SEDEX, GLOBALG.A.P Risk Assessment on Social Practice (GRASP) and the Vitacress Supplier Code of Conduct.

Annual assessments for raw material, ingredient or packaging suppliers have continued. The technical warranty packs have been reviewed and updated for raw material and ingredient suppliers and, together with the Supplier Code of Conduct and SEDEX registration, are issued and agreed annually.

Vitacress utilised the UK Government Seasonal Agricultural Workers Scheme for our farms in 2022, sourcing workers via an approved provider.

## Audits

All stages of Vitacress operations, supply chain and labour provision can be subject to programmed or unannounced audit to ensure compliance to Vitacress' expected standards. Audits went ahead as scheduled during 2022.

Vitacress Real labour provider has been audited as required by local law.





# 4. Assessing and managing risk

Vitacress continues to operate within the framework of our policies and codes of practice, enabling the business to carry out risk assessment and due diligence as necessary.

Risk assessment within UK operations is supported by AB (supplier/buyer) membership of SEDEX and, where necessary, SMETA auditing.

Raw material sourcing can include products from countries classed as high risk in terms of potential human rights abuses. To support risk assessment and due diligence, all programmed raw material suppliers must be registered on SEDEX. Where higher risk factors are indicated, a SMETA audit is required, and any non-conformances identified must be closed out in the appropriate timescales. Results of SMETA audits are reviewed by the relevant site team and any further action deemed necessary is taken. This may involve site visits, support with documentation and policies or verification via a follow-up audit.

The raw material supply base risk management within European operations is supported by the Supplier Code of Conduct. Further assessment is accessed via SEDEX or GRASP audits, with the latter requiring an annual audit. Raw material supplier visits are scheduled as necessary.

Use of other information sources such as Stronger Together, Association of Labour Providers (ALP) newsletter and customer communications all support a wider network of industry intelligence to identify risk in business supply chains.

The Group Technical Director has attended two Modern Slavery Intelligence Network working groups, focussing on the risks within the food industry and the sharing of best practice and ideas.

# 5. Measuring performance

## Key Performance Indicators (KPIs)

- Vitacress continued as a Stronger Together Advance Business partner throughout 2022. Year-on year improvement has been evidenced for the third year running.
- Key performance indicators are reviewed at senior leadership team level, both centrally and at site level. Any non-conformances identified as the result of audit, either at Vitacress sites or first tier supplier sites, are dealt with via the appropriate teams. Support is given to suppliers where necessary to resolve any issues raised.
- The UK business units review SEDEX registration and risk assessment results monthly, with a focus on the higher risk rated suppliers. Further focus during 2022 has been on SMETA non-conformance trends both for Vitacress' own sites and raw material supply.
- Whistleblowing incidents and other activities that may indicate Modern Slavery factors are discussed at the appropriate business forum.
- Results from the colleague engagement survey have been reviewed and remedial action taken where necessary. Modern Slavery awareness was covered fully within the survey.
- Learnings have been taken from any incidents local to the sites, helping to build a network for information gathering and support for the future.

# 6. Training and raising awareness in 2022

Vitacress has a training programme to ensure every colleague is made aware of the risks of Modern Slavery from the moment they start working with the company.

Courses focused on Modern Slavery are run in person and via webinars, as detailed below:

Course	Training Provider	No. of colleagues
UK Immigration, Document Verification and Right to Work	Business Forum International	10 x Human Resources
Tackling Modern Day Slavery	Stronger Together	3 x Human Resources 4 x Training Team
Worker Welfare Questionnaire	Internal	3 x Farm staff
Colleague Induction	Internal	410 x Colleagues
Colleague Refresher Induction	Internal	22 x Colleagues
Tackling Modern Day Slavery for Managers	Internal	19 x Managers
Modern Slavery Champion Steering Group	Internal	11 Colleagues

Webinar	Training Provider	No. of colleagues
Assuring Legal and Ethical compliance for Labour Providers	ALP	1 x Human Resources
ALP Member Support Forum	ALP	1 x Human Resources
Responsible Recruitment Update Forum	ALP	1 x Human Resources
Welfare Strategies for Maximum Worker Retention Forum	ALP	1 x Human Resources
Right to Work Update	ALP	1 x Human Resources

# Company communications

Vitacress continues to support regular training with wider communication regarding the risks of Modern Slavery.

## Meetings

The Vitacress Senior Leadership Team meets monthly and discusses Modern Slavery KPIs as part of the Company governance agenda across all business areas. This is supported by a Group monthly meeting specifically discussing Modern Slavery and any associated risks.

Each business unit reviews Modern Slavery measures and KPIs with the senior management team on a monthly basis.

Modern Slavery is an agenda item on the monthly Group HR meeting.

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 – WeCare (through Canada Life), 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). WeCare offers support across a number of different areas for all UK staff. Vitacress Portugal has a similar programme named MultiCare.

## Communications

Stronger Together, ETI Base Code and whistleblowing information is displayed on notice boards across the sites.

External communications are received weekly from the Food Network for Ethical Trade (FNET), giving details of hot spots or activities within the week relating to Modern Slavery.

As members of the Association of Labour Providers (ALP), we receive a monthly update, and also have access to resources to support both communication and training.

# Looking forward

## Areas of Focus for 2023

- Engagement with SEDEX Consultancy to continue our progress in managing Modern Slavery risks in our supply chain.
- Continue the focus on SEDEX risk assessment scores to support suppliers in reduction of their risks.
- Increase the frequency of labour provision audits, focusing particularly on areas of risk such as accommodation.
- Introduce in depth internal audits for HR departments focussing on recruitment and onboarding processes.
- Assessment of colleague engagement survey and preparation for the subsequent survey planned for 2024.
- Establish our HRIS as a foundation for HR teams.
- Re-launch our Employee Value Proposition and communicate to the wider business.
- Create opportunity for wider discussion of matters affecting our colleagues via the Vitacress 'Let's Talk' initiative.
- Review Vitacress current whistleblowing procedures and look for opportunity to improve.

## Training Focus for 2023

- Tackling Modern Slavery through purchasing practices and supplier visits – UK Procurement teams - External.
- Introduction to Responsible Recruitment - UK HR teams.
- Modern Slavery Champion Steering Group annual training – External.
- Responsible Recruitment Toolkit Training –Recruitment Team – External.
- Updated refresher training – Internal.

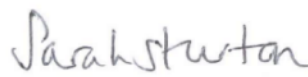
# Our commitment

We will continue to keep the risks of Modern Slavery within our business and supply chains at the forefront of our decision making, and ensure that policies, processes and engagement focus on improving our efforts in this critical area.

This statement has been approved by the Vitacress Senior Leadership Team for the financial year ending 31 December 2022.



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Chris Jinks  
CEO



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Sarah Sturton  
Group HR Director



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Helen Brierley  
Group Technical Director



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Ashley Cooper  
Group Finance Director



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Kees Van Poortvliet  
Growing and Procurement  
Director



.....  
Simon Conway  
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UK Salads



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David Walmsley  
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UK Herbs



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Carlos Vicente  
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