

Abbey View Produce, Galley Hill, Waltham Abbey, EN9 2AG

Modern Slavery and Human Trafficking Statement

Year Ending December 2021

**HR Manager
3/19/2021**

Modern Slavery

Agriculture and farming have long been identified as a high-risk industry for modern slavery and at Abbey View Produce, we take our duty very seriously to ensure that both our business and Supply Chains are free of Modern Slavery and any hidden labour exploitation.

At Abbey View, we have both shaped and implemented a very clear set of policies and actions which outline our Commitment to being proactive when tackling hidden labour exploitation and Modern Slavery.

Background Information

1. About Us

- Abbey View Produce Limited has its roots in the old Covent Garden Market. Formerly known as George Coleman (Lea Valley) Limited, it was an offshoot of George Coleman (London) Limited, a company with more than 200 years history.
- In 1985, the company purchased the Abbey View Nursery, growing tomatoes and took its first steps to become a grower in its own right.
- In 1998, Abbey View Produce Limited took the decision to further strengthen the supplier base, forming the first Producer organisation in Lea Valley. A subsidiary company called Abbey View Producer Organisation Limited has been created and all 22 growers agreed to participate in this.
- In parallel, a new state of the art pack-house was built to cover the packing needs for major multiples and other Abbey View Produce customers. The pack-house was extended in 2013 to 3 times its original size, to align with the growth of the business.
- After a 3-year detailed development process, the construction of a Low Carbon Green House was commissioned and in 2021, Abbey View Produce (KB100) will become the sole tenant.

2. Sustainability

- Green Energy - We operate a 3 MW CHP scheme (Combined heat & power) where we buy gas to generate electricity, which is sold to the grid, whilst simultaneously using the by-products of this operation, heat and CO₂, in our nursery to the benefit of our crops.
- Solar Power - We are using solar power to cover part of our energy requirements. The entire south facing aspect of our recent extension is covered with the latest technology solar panels, contributing significantly to our energy needs, with clean and sustainable energy.
- Transport - Since 2016, we have added to our transport tenders the requirement for the offset of all the CO₂ emissions produced while carrying our products. 90% of our imported products are currently under neutral emissions transport, with a view to increase this to 100% in the forthcoming years.
- Recycling - We are recycling plastic, wood and paper separately, whilst at the same time we are minimising the use of non-recyclable plastic in our products, working closely with our customers and actively supporting all relevant initiatives. We are also handling organic waste in an environmentally friendly way.
- Low Carbon Farming – Our Glasshouse located in Bury St Edmunds is a world first in capturing waste heat from the nearby Fornham water treatment works, and by way of ground source heat pumps, injecting the previously wasted heat into the greenhouse.

3. Our Growers

- We were the first to establish a Producer Organisation of growers in the Lea Valley. We have been working together for more than 25 years, delivering produce of the finest quality and working under the highest standards, with respect to the environment.
- We also have long-term collaborations with growers from abroad to cover the winter season. Spain, Canary Islands and Israel are the main sources, with suppliers that are audited annually and are certified against the most demanding standards (Global-Gap, BRC, and SMETA).

4. Our Products

- **Cucumbers** - 21 growers from the Abbey View Producer Organisation are working together to deliver cucumbers from February until November. Supply from Spain and the Canary Islands is covering the winter gap.
- **Peppers** - Working with growers from the Lea Valley and utilising our own nursery, we are producing bell, baby sweet and sweet pointed peppers of all colours, starting from March through to October. For the winter, we have well established long-term collaborations with growers from Spain and Israel.
- **Tomatoes** - Exclusive supply from one of the biggest growers in the Canary Islands to deliver high quality salad tomatoes, starting from October until May/June.
- **Aubergines** - We work closely with experienced, dedicated growers to deliver aubergines from March until October, with Spanish product covering the winter months. Graffiti (stripped) aubergines are the new entry to the aubergine mix.

Our Existing Process

Abbey View Produce is a member of SEDEX (the Supplier Ethical data Exchange) which is dedicated to driving improvements in responsible and ethical business practices in global supply chains. All our UK growers are also registered with SEDEX. Abbey View Produce works to the Ethical Trade Initiative and are also proud sponsors of the Spanish Ethical Trade Forum (SETF).

Abbey View operates with both a skilled and experienced HR and Technical team, both of which function within a series of policies encompassing recruitment, selection, inductions, training and management of our employee's. All Managers are supported by the HR team when dealing with any ethical or personal situations.

Our company handbook details how Abbey View Produce values differences and aims to treat people with respect and conduct all activities in a non-discriminatory manner.

Modern Slavery Compliance Group

Abbey View Produce has a Modern Slavery Compliance Group which comprises of the Commercial and Operational Directors as well as members from both the HR and Technical teams.

The group meets regularly to assess risk, identify actions and implement decisions in relation to modern slavery.

Speak Up Policy

Abbey View Produce commits to a confidential reporting system enabling staff including agency, contractor, or visitor to report concerns relating to product safety, integrity, quality, legality and any ethical questions colleagues may have.

Our senior team encourages all employees including agency staff to write down their concerns and post them anonymously in the 'Speak Up' suggestion box. All concerns are captured by the HR Manager and are allocated to relevant department head. Any ethical questions or concerns are dealt with in the strictest of confidence by the HR Manager and the Company Directors. Any suggestions which can be collectively addressed are discussed during monthly staff meeting.

Preventing Hidden Labour Exploitation and Modern Slavery

The Abbey View Produce Policy Commitment is based on the following background information.

"Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, who can be reluctant to come forward".

The Abbey View Produce Policy on Preventing Hidden Labour Exploitation and Modern Slavery is signed by both the Operational Director and the HR Manager and is displayed in the main colleague walkway.

The Policy Commitments are.

- Designate appropriate managers (*as per Ethical Leader decision*) to attend training and to have responsibility for developing and operating company procedures relevant to this issue.
- Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for.
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
- Provide information on tackling "Hidden Labour Exploitation" to our workforce through a variety of formats such as workplace posters, worker leaflets, other communications, other training – following AVP Ethical Leader decisions.
- Encourage workers to report cases of hidden third-party labour exploitation or modern slavery and when required, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.

- Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Grower Ethical and Modern Slavery Audits

Throughout the course of the year, the Abbey View Produce Technical team completes a series of Grower Ethical Audits which incorporate potential Modern Slavery and hidden labour exploitation.

- British Growers – Audits are completed throughout the UK Growing season April - October.
- International Growers – Audits are completed for International Growers throughout the year at regular intervals.

Growers will need to provide evidence for the following.

- Right to Work documentation,
- Was employment freely chosen (deposit held by labour provider?),
- Documentation (in line with what is required in that specific countries legislation),
- Minimum wage (in line with what is required in that specific countries legislation),
- Living conditions on site are adequate (in line with what is required in that specific countries legislation),
- Health and Safety legislation adherence,
- Adequate washroom and toilet facilities,
- Rate of pay equal or above the minimum wage,
- Is overtime on a voluntary basis,
- Gangmaster (GLA) certification,
- Adequate PPE and rehydration facilities,
- Adherence to Pesticide, Heat and UV exposure,
- Ethical Trade Initiative adherence.

Any non-conformance will be captured, and corrective action issued with accountability and timeframe.

Note. If the non-conformance directly compromises the individuals' safety and presents a risk, the non-conformance issued will require an immediate resolution.

Grower response to COVID-19

In rapid response to the Covid-19 pandemic, several tools were developed for use by our international suppliers, aligning capacity to help protect workers. Training workshops have been delivered to 98 suppliers in April, with 100% of suppliers reporting that they would be putting the tools into practice. Workshops will be updated in response to COVID-19 and are planned to be on-going throughout the year.

As all of these tools are rolled out across the sector, impact will continue to be monitored. Spanish Ethical Trade Forums have played a key part in building suppliers' capacity to improve working conditions since their inception. With momentum and participation continuing to build, the Forums have a planned programme of work for the next year that includes increased training, successful implementation of the designed Working Groups' tools, a focus on themes such as worker representation and effective grievance mechanisms and COVID-related protections.

Labour Provider Ethical Audit

Twice a year, the HR and technical team will carry out several Individual Internal audits for our Labour providers.

Labour Providers will need to provide evidence for the following.

- Right to Work documentation,
- Suitable working age,
- Was employment freely chosen (deposit held by labour provider?),
- Signed contractual agreement,
- Training records,
- Rate of pay equal or above the minimum wage,
- Are working hours monitored and or excessive,
- Is overtime on a voluntary basis,
- Are there unlawful wage deductions,
- Are there threats, abuse or forms of intimidation,

Response to COVID-19

Abbey View Produce has continued to function throughout the COVID-19 pandemic. Working with National Health England and UK Government advice, AVP has implemented several initiatives to help our essential colleagues work safely and control the relevant hazards associated with COVID-19. A supporting risk assessment can be found on the company website.

During the COVID-19 pandemic, Abbey View Produce continues to work closely with both our Labour Providers and Growers (both UK and International), ensuring all facets of the Modern Slavery and Human Trafficking statements are adhered to and are completed to the highest standards.

Under our Modern Slavery policy, Abbey View Produce has committed to supporting those most affected by the policy, ensuring they understand and comply with Modern Slavery Act.

We at Abbey View Produce will continue to diligently adhere to our Modern Slavery and Labour Exploitation Policy.

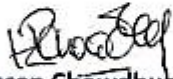
Statement completed by;



Mr Scott Wilkinson
Operational Director



Mr Luke Hibberd
Commercial Director



Mr Hasan Chowdhury
Customer Technical Manager



Mr Alex Beatas
Supplier Technical Manager



Mr Lee Beckwith
HR and Training Manager