

MODERN SLAVERY STATEMENT 2018-19

OUR COMMITMENT

Gomez is fully committed to playing our part in tackling modern slavery. Modern slavery is unacceptable in all parts of our business and supply chain and fulfilling our responsibility to ensure modern slavery has no place is an important component of our overall approach to respecting human rights.

This statement is in accordance with section 54 of the Modern Slavery Act (2015) and outlines: the way in which our business is structured and our approach to human rights; the ways in which we are tackling modern slavery in the UK and with our grower partners and supply chain, including the steps we have taken over the past year; and our targets going forward for 2019-20.

OUR BUSINESS

From our origins in Covent Garden Market in the 1950s to the 11 acre site we operate from today, Gomez has always been passionate about fresh produce. We are now one of the UK's largest fresh produce companies supplying an extensive range of salad, fruit and vegetables to the UK market.

The Gomez Group (Gomez, Paloma, Frutas Esther, Gomez Fresh and Jolly Tom) farms over 3250 hectares of owned production in Spain, 11 hectares in the Netherlands and 5 hectares in the UK. Alongside our own group production, we supply product from longstanding grower partners across Spain, Morocco, Israel, Greece and Europe. Our wide range of produce includes: tomatoes, peppers and cucumbers; stonefruit, berries, grapes, pomegranates and persimmons; aubergines, courgettes and samphire. Most of our grower partners have supplied through Gomez for over 10 years, and some for as long as 62 years. Three-quarters of our supply sits with 6 growers who are all single ownership farms and 90% with 10 suppliers. Our model delivers economies of scale, security of supply, traceability and visibility.

RESPECTING HUMAN RIGHTS

From the beginning, Gomez has been committed to supplying the best fresh produce which is also ethically and sustainably grown, sourced and delivered. We are committed to upholding the ILO Declaration on Fundamental Principles and Rights at Work (1998) and to fulfilling our responsibility to respect human rights (UN Guiding Principles on Business and Human Rights, 2011) within our own business and our supply chain.

Over the past year, Gomez has reaffirmed this commitment in a number of ways:

- establishing a dedicated ethical function within our team
- continuing to deliver a programme of training on modern slavery in our UK business
- undertaking bespoke, immersive Ethical Trading Initiative (ETI) training for our technical team (UK, Spain and Morocco) and selected grower partners
- sponsorship of the Spanish Ethical Trade Forum
- working to reframe our overall human rights strategy and programme of active human rights due diligence

TACKLING MODERN SLAVERY

For the purposes of our work to ensure modern slavery has no place within our business, we describe below our activities (a) within our operations here in the UK and (b) with our grower partners across the globe.

(a) UK

Our UK site has a number of accreditations (BRC score AA, Tesco TPPS/TFMS Blue, Food Organic Federation) and is approved as primary site for Aldi and Sainsburys. As a Sedex member, we are also SMETA audited.

Our approach to addressing modern slavery in our UK operations is based on a five step cycle: risk assessment; detection; remediation; capacity building and awareness raising; and prevention.

We have a number of policies, procedures and mechanisms of particular relevance to modern slavery in place:

- Recruitment policy: we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all Gomez employees to safeguard against human trafficking and labour exploitation
- Induction procedure: as part of our comprehensive induction programme for all new starters across the business, we include a key component on Modern Slavery and show the Stronger Together 'Tackling Hidden Labour Exploitation' video
- Employee awareness raising: we continue to deliver training on modern slavery for all packhouse management. Stronger Together posters in 8 languages are displayed in all communal areas and toilet facilities. These detail hotline numbers for: a confidential internal line, the GLA, the Modern Slavery Helpline, Migrant Help and the Salvation Army.
- Whistleblowing policy: we operate a whistleblowing policy so that all employees know that they can raise concerns in confidence
- Labour provider policy: we conduct bi-annual audits on any labour providing company that supplies workforce to our UK operations
- Worker-management committee: committee meetings take place every month with worker representatives raising collective concerns with management. Meetings are documented, actions agreed and the outcomes of meetings are publicised in communal areas on dedicated noticeboards

This year we have progressed our activity in the UK by:

- delivering Stronger Together training 'Tackling modern slavery in businesses: a toolkit for UK employers and labour providers' on site. This training was attended by our production, warehouse, site management, technical and HR teams and built teams' capacity to spot indicators of vulnerability, better understand flag raising mechanisms and how to drive good practice within our own business
- attending BRC/GLAA/ Stronger Together Responsible Recruitment training to continue to embed our HR team's ability to spot the signs of labour exploitation
- working with a pool of trusted translators and scoping the possibility of using an impartial translation helpline
- working to increase the frequency of randomized worker interviews which use the Stronger Together interview questionnaire as a base

(b) our grower partners and supply chain

We recognise that our responsibility to respect human rights extends far beyond our UK operations and to our grower partnerships and wider supply chain. We also recognise that we work with growers in countries that are classified as higher risk in terms of human rights and modern slavery.

Our Ethical Trading Policy sets out our commitment to the ETI Base Code which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of good labour practice. The provisions of the Base Code constitute minimum and not maximum standards.

As part of our commitment to fulfilling our responsibility to respect human rights, therefore, we are committed to developing an active programme of human rights due diligence - our efforts to identify and mitigate actual and potential human rights issues in our supply chain. A critical component of this is modern slavery. Understanding where the risks lie in our supply chain is an important step in putting our commitment to eradicate modern slavery into action. In the first instance, we are developing a comprehensive human rights risk mapping framework to ensure we are identifying key actual and potential risks. Our customers' country level risk ratings form the basis of this framework and we are also building data from sources such as the ITUC Global Rights Index, Maplecroft and BSCI. Specifically on modern slavery, we are developing our knowledge base through information resources such as ETI Base Code Guidance on Modern Slavery, CORE guidance, the Global Slavery Index 2018 and Respect resources.

As a base, we require all grower partners to be registered on Sedex and to have completed the Self-Assessment Questionnaire (SAQ) which includes information relating to modern slavery indicators. Our growers are also GLOBAL G.A.P and Red Tractor certified. SMETA audits are conducted at sites on a risk basis as determined by customer policy.

We recognise the limitations of audits, however, and that modern slavery is often under-reported as part of the audit process. We have a continuous presence on site with grower partners which our technical team based in Spain and Morocco visit on a weekly basis.

This year we have progressed our activity on human rights and modern slavery in our supply chain by:

- delivering a bespoke ETI training course for our technical team (UK, Spain, Morocco) and several grower partners. A significant component of the course focussed on Modern Slavery, increasing our team's ability to identify indicators of modern slavery, to understand the challenges and to explore mechanisms for remedy
- increasing our commitment to collaboration by becoming a sponsor of the Spanish Ethical Trade Forum. The aim of the Forums is to improve Spanish growers' understanding of labour and human rights issues and raise standards within the horticulture industry by building on best practice within the sector

OUR TARGETS FOR 2019-20

This coming year, we will continue to reflect on, develop and extend our approach to modern slavery. Specifically we will:

- continue to embed our understanding of the challenge of modern slavery in our UK operations and build our teams' capacity to identify signs and channels for remediation by rolling out our programme of training
- review and react to new ways of continuously improving the way in which we embed governance, prevention and detection mechanisms and response processes
- continue to develop our supply chain human rights due diligence, including modern slavery risk assessment, better understanding any gaps in our analysis
- build capacity within our supply chain around modern slavery through engagement and training
- develop our collaborative activity across our sector, through the Spanish Ethical Trade Forum in the first instance and explore further opportunities for engagement in the medium to longer term

We will continue to assess our effectiveness by developing our suite of key performance indicators, including the number of identified and/ or reported instances of modern slavery in our UK operations; number of identified and/ or reported instances of modern slavery in our supply chain; and the number of instances of modern slavery remediated and verified. We will report against such indicators in future statements.

This statement was approved by the Managing Director on 30 September 2019.

A handwritten signature in black ink, appearing to be 'Jim Parmenter', written over a horizontal line.

Jim Parmenter, Managing Director