

MODERN SLAVERY STATEMENT

2019-2020

OUR COMMITMENT

OUR BUSINESS

RESPECTING HUMAN RIGHTS

TACKLING MODERN SLAVERY

OUR TARGETS FOR 2020-21

GOMEZ[®]
Delivering the difference

MODERN SLAVERY STATEMENT

OUR COMMITMENT

Nobody should work under conditions of slavery or forced labour - and this basic right is enshrined in international law, regional instruments and national legislation.¹ Modern slavery is unacceptable in all parts of Gomez's 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.

Modern slavery is a term that describes acts of slavery, servitude, forced or compulsory labour and human trafficking. Full definitions of these terms can be found in the UK Government's 'Transparency in Supply Chains - A Practical Guide'.²

We recognise that given the prevalence of modern slavery globally, the complexity of supply chains and the sector in which we and our suppliers work, we face particular challenges.³ We are committed, therefore, to working within our own operations and with our suppliers to ensure we are undertaking appropriate risk assessment and due diligence, are equipping our colleagues and suppliers to be able to detect possible incidences of modern slavery and ensure that, where it is found that we or our suppliers have caused or contributed to situations of modern slavery, we provide or contribute to appropriate remedy.

We are committed to reporting transparently on our progress and identifying steps for continuous improvement in collaboration with our supply chain. This statement is in accordance with section 54 of the Modern Slavery Act (2015) and outlines: the way in which our business is structured; our approach to human rights; the ways in which we are tackling modern slavery in the UK and within our supply chain, including the steps we have taken over the past year; and our targets going forward for 2020-21.

No public statement in 2020 can ignore the impact of the ongoing global pandemic. It is clear that Covid-19 has exacerbated existing risks within global supply chains and created new vulnerabilities for workers, including a changing risk of modern slavery and exploitation within the food and agricultural sector. We outline the actions we have taken in this regard below.

1 ETI Base Code Guidance: Modern Slavery
https://www.ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_guidance_modern_slavery_web.pdf

2 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf

3 The ILO identifies agriculture as one of several high risk sectors
https://www.ilo.org/wcmsp5/groups/public/@ed_norm/@declaration/documents/publication/wcms_181953.pdf

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OUR BUSINESS

From our origins in Covent Garden Market in the 1950s, 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.

Our group farms over 3250 hectares of owned production in Spain, 11 hectares in the Netherlands and 8 hectares in the UK. Alongside our own group production, we supply product from longstanding grower partners across Spain, Morocco, Israel and northern/ southern Europe (UK, Netherlands, Belgium, Portugal, Italy). Our wide range of produce includes: ambient salad (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 over 60 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.



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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.

In practice, for Gomez, this means trading ethically: ensuring that our products, no matter where they are grown or packed, are produced under conditions that demonstrate respect for the people who grow, pack and deliver them. It means ensuring that work is that in which workers' rights are protected and which generates an adequate income, with proper social protection, working in conditions of freedom, equity, security and human dignity. It also means respecting the rights of people living in the communities around our and our suppliers' operations and ensuring that access to remedy is available.

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For the purposes of transparency, we have separated out our modern slavery focussed work (a) within our own operations here in the UK and (b) with our Group grower partners and other suppliers across around the world.

Last year, we committed to the following:

- 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.

Sections (a) and (b) review in detail the activity we have undertaken against these commitments:

(a) UK own operations

Our site in the UK is based in Bridge, Canterbury. Here, we pack and dispatch fresh produce for our supermarket customers from our 42,000m² packhouse which employs around 800 people. We had our most recent SMETA audit in September 2020, when no indications of forced labour or modern slavery were identified (no non-conformances or observations were identified at all).

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However, an audit is only ever a snapshot in time, so we are working on an ongoing basis to embed a five step cycle to protect our workforce from the risk of modern slavery: risk assessment; detection; remediation; capacity building and awareness-raising; and prevention, through the following mechanisms:

- **Our Ethical Trading Policy, UK:** founded on the Fundamental Conventions of the ILO and the ETI Base Code, this policy underlines our commitment that employment must be freely chosen, among other commitments. It is specifically for our own UK site and was refreshed this year.
- **No Forced Labour Policy:** we introduced this policy this year specific to our own site in order to reinforce our commitment to finding practical, meaningful and appropriate solutions in support of eliminating forced labour.
- **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.
- **Agency Labour Policy:** we refreshed this policy this year to ensure we were defining all agency relationships according to current good practice. We minimise the use of agency labour and currently have one agency relationship. This agency produces its own annual modern slavery statement also. We conduct an active check (GLAA licence) and audit them at their own site twice a year. We also have a system of conducting confidential randomised interviews with agency staff to identify any signs of modern slavery or forced labour.
- **Whistleblowing Policy:** this policy sets out our commitment that all employees know that they can raise concerns in confidence.
- **Induction Procedure:** as part of our rolling induction programme for all new starters across the business, we include a component on Modern Slavery and show the Stronger Together 'Tackling Hidden Labour Exploitation' video.
- **Employee Awareness-raising:** Stronger Together posters in 8 languages are displayed in all communal areas and toilet facilities. These detail hotline numbers for the GLAA, the Modern Slavery Helpline and the police.
- **Worker Management Committee:** committee meetings take place every month with worker representatives raising collective concerns with management.

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

- Attending refresher Stronger Together training 'Tackling modern slavery in businesses: a toolkit for UK employers and labour providers'.
- Attending customer-run GLAA training to continue to embed our ability to spot the signs of labour exploitation.
- Attending Responsible Recruitment Toolkit (RRT) training, both the 'Introduction to Responsible Recruitment' course and the 'Eliminating Worker Paid Recruitment Fees'.
- Participating in the inaugural Responsible Recruitment Forum and subsequent online forums.
- Designing our own modern slavery training programme tailored to our packhouse in the UK, to strengthen the team training delivered on site by Stronger Together in 2018. This training has been developed to build capacity

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across the site to spot indicators of vulnerability and what to do if modern slavery is suspected. We were hoping to launch this training mid-year, however, due to the ongoing Covid-19 situation, we are committed to delivering this during 2021.

- Working with a pool of trusted translators all of whom receive training on the importance of confidentiality.
- Promoting the Just Good Work app (justgood.work): this month we have actively encouraged the use of this newly launched interactive app across our workforce, as part of our commitment to reduce the risk of worker exploitation. The app is free and designed to help workers understand their UK employment rights and responsibilities, avoid exploitation on the journey to employment and access remedy in their own language.
- Continuously monitoring our progress, by regular self-appraisal through the Implementation Checklist and commencing use of the Progress Reporting Tool.
- Participating in capacity building webinars sponsored by our supermarket customers on best practice in responsible recruitment during Covid-19 and sharing these with our UK growers.

(b) our grower partners and supply chain

In accordance with the UNGPs, we recognise that our responsibility to respect human rights extends far beyond our own site 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: Supply Chain is founded on the conventions of the International Labour Organisation (ILO) and the ETI Base Code as an internationally recognised code of good labour practice. We refreshed the policy this year to outline in greater detail our expectations of suppliers in terms of their continuous improvement against these principles and the support available to them.

This year, having established a dedicated human rights function within our team, we have worked to embed a cycle of active human rights due diligence. The first step in this was to map our product supply chains with a human rights lens and to gather high level risk data. This data was from a number of sources:

	MA	GB	ES	BE	IL	PT	NL	IT
ITUC ⁴	3	3	2	2	2	2	1	1
FNET	67	50	50	50	50	50	50	34
amfori BSCI ⁵	41.7	85.2	75.1	83	69.6	84.8	93.9	67.5
RADAR ⁶	6.7	5.2	5.6	5.3	5.7	5.5	4.9	5.7

4 ITUC Global Rights Index 2020 https://www.ituc-csi.org/IMG/pdf/ituc_globalrightsindex_2020_en.pdf
Ratings definitions: 5 – no guarantee of rights; 4 – systematic violations of rights; 3 – regular violations of rights; 2 – repeated violations of rights; 1 – sporadic violations of rights

5 <https://www.amfori.org/sites/default/files/amfori-2020-02-06-country-risk-classification-2020.pdf>
A score less than 60 indicates a 'risk country'

6 Sedex RADAR score – inherent country/sector risk score, accessed 12/09/2020

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	MA	GB	ES	BE	IL	PT	NL	IT
Global Slavery Index ⁷	121st	132st	124th	135th	90th	120th	143rd	122nd
RADAR forced labour rating	5.3	5.2	5.7	3.9	5.7	5.2	3.9	6.1
Maplecroft modern slavery index	4.81	7.29	7.4	6.99	6.15	6.4	7.48	5.54
Maplecroft forced labour index	4.59	7.05	7.33	6.98	5.34	5.9	7.54	5.45

From this data, we were then able to prioritise by country our process for identifying disaggregated potential human rights risks, including of modern slavery and forced labour. Based on the available high level country information overlaid with data on our own sourcing volumes from each geography, we prioritised Spain, Morocco, Israel and the UK for particularly focussed human rights due diligence.

It is recognised that labour exploitation and human rights abuses in supply chains are a continuum, with decent work at one end and a situation of forced labour at the other.⁸ In between are an array of labour rights violations, such as non-payment of wages, excessive working hours, lack of freedom of association and discrimination, and while not all of these found along the continuum will constitute modern slavery or forced labour, when combined could escalate to such a situation. In order to properly understand the continuum that exists in each of our prioritised sourcing locations, and based on information from a range of public sources the following high level risks are known to exist:

Country level risk assessment (public sources)

Spain – known risks in the sector include excessive working hours, underpayment of wages, excessive and/ or involuntary overtime, substandard living conditions, retention of identity documents, proliferation of labour providers.

Morocco – known risks in the sector include wages, excessive working hours, access to social security entitlements, worker transport, representation, harassment, particular vulnerability of women, including to modern slavery with 48.34% of population estimated to be at risk⁹.

Israel – known risks in the sector include recruitment fees, excessive working hours, underpayment of wages, limitations on movement, isolation, substandard living conditions, representation.

UK – known risks in the sector include unlicensed labour providers/ gangmasters, working hours, ability of migrant seasonal workers to fully understand their rights and to organise.

⁷ <https://www.globalslaveryindex.org/resources/downloads/>

⁸ https://www.ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_guidance_modern_slavery_web.pdf p.6

⁹ Global Slavery Index 2018 <https://www.globalslaveryindex.org/resources/downloads/>

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Further analysis also shows that groups particularly vulnerable to modern slavery, forced labour and human trafficking risks are:

- **Migrant:** vulnerable to human trafficking because they move within and across borders to seek work and are dependent on third parties who facilitate travel and jobs. Migrant workers are also vulnerable to exploitation because they are isolated from support networks, less likely to form or join a union, face language barriers and typically trapped in low-paid work. Undocumented migrant workers are most exposed given their lack of legal status.
- **Low-skilled Temporary/ Agency Workers:** vulnerable due to the precarious and low paid nature of their work. Like seasonal workers, they are also likely to move to seek work. This means they may be isolated from support networks and could face language barriers. Both types of workers may be targeted by unscrupulous gangmasters and trafficking networks. Young workers and apprentices are vulnerable to exploitation because of their low pay, dependence on the employer, and lack of life experience.
- **Female:** low-skilled women who are migrants, young workers, or temporary/agency workers often receive very low wages, have limited bargaining power and union representation and are exposed to sexual harassment and violence, exacerbating vulnerability to human trafficking and exploitation in forced labour¹⁰.

Our own supply chain actions

With this risk information as a guide, we have focussed on assessing the actual risks in our own supply chain, beginning with our key suppliers in each prioritised country. We used data from audits and self-assessments as a starting point, and triangulated this with information from our own visits, supplier engagements to assess capacity to manage labour rights risks and from other stakeholders.

In order to mitigate any risks and to begin work to embed appropriate mechanisms, this year we have:

Global

Designed a comprehensive policy and guidance for suppliers specifically on modern slavery, forced labour and responsible recruitment, to complement our ethical trading undertaking, which we also refreshed this year. This policy endorses our commitments in line with the Priority Industry Principles on Forced Labour¹¹ that:

- Every worker should have freedom of movement.
- No worker should pay for a job.
- No worker should be indebted or coerced to work.

10 All information from Sedex/ Ergon Associates <https://cdn.sedex.com/wp-content/uploads/2020/01/VW-Report.pdf>

11 <https://www.theconsumergoodsforum.com/wp-content/uploads/2018/05/Guidance-on-the-Priority-Industry-Principles.pdf>

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Spain

- Deepened our involvement in the Spanish Ethical Trade Forums (Foros Comercio Etico). We became a sponsor of the Forums in September 2019 and have worked to strengthen our engagement by:
 - Joining the Governance Group (the Forums' strategic oversight group).
 - Co-chairing the Huleva Accommodation Working Group, which recently published guidance for all growers on employer-provided worker accommodation.
 - Joining the Forums' Communications Hub, supporting in the Forums' aim to strengthen impact communication reviewing the newly published guide to the responsible use of labour providers with a view to undertaking a comprehensive mapping exercise within our own Spanish supply chain.
 - Encouraging suppliers to increase their own active participation in the Forums.
- Assessed how our group might best engage with the newly established Stronger Together España programme
- Engaged with suppliers on issues such as excessive working hours, overtime and the prohibition of retention of workers' identity documents.
- In response to Covid-19, and given the rapid proliferation of statutory regulations and sectoral recommendations, we developed a support tool for suppliers to provide clear information on how best to manage increased risks to workers. Suppliers also joined online capacity building seminars hosted by the Forums.

Morocco

- Risk mapped gender composition and representation mechanisms at packhouse and grower level.
- Worked closely with suppliers on SMETA best practice at field level.
- Began to map each segment of the labour supply chain to fields and packhouses.

Israel

- Assessed the level of access workers have to a specialist non-governmental support organisation which provides information and legal advice on labour rights in the Thai language.
- Designed a programme of work with stakeholder input to model responsible recruitment principles. This is to be piloted over the coming year.

UK

- Supported one of our growers to implement a strengthened recruitment process, including targeted questions designed specifically to identify potential modern slavery indicators at interview.
- Encouraged UK growers to attend Stronger Together UK training.
- Mapped and risk assessed UK grower labour provider use.
- In response to Covid-19 and the challenges faced by the UK agricultural labour market, we encouraged suppliers to use the Essential Workers Portal, for example, which connected them with GLAA licensed, ALP labour provider members, at a time when recruitment was an increased modern slavery risk. We also encouraged them to join customer-sponsored capacity building webinars on how best to manage labour responsibly during Covid-19, including worker accommodation, transport and health and safety.

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OUR TARGETS FOR 2020-21

Last year we committed to developing a suite of key performance indicators, against which to report on progress.

Going forward these will be:

UK own site

% of new starters who have been inducted on modern slavery

% of managers/ supervisors who have had tailored training on modern slavery

% of packhouse/ warehouse operatives who have had tailored training on modern slavery

% improvement on Stronger Together organisational Implementation Checklist

Supply chain

% of suppliers who have attended/ received training on modern slavery

% of suppliers with mapped labour provider use/ labour supply chain mapped

% of suppliers with reporting mechanism in place

We will continue to strengthen and extend our approach to modern slavery, collaborating with key stakeholders and reporting transparently.

This statement was approved by the Board and Managing Director on 30 September 2020.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the bottom.

Jim Parmenter, Managing Director