

MODERN SLAVERY STATEMENT

2020-2021

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INTRODUCTION

Modern slavery is a serious crime that violates human rights. It is a term that describes the severe exploitation of other people for personal or commercial gain, including acts of servitude, forced or compulsory labour and human trafficking.¹ Human rights violations, including modern slavery, are completely unacceptable to A Gomez Ltd (hereon referred to as Gomez) in each and any part of our business, be that our own operations or the rest of our global supply chain. Delivering on our commitments to ensure modern slavery has no place in our business is an important part of our overall human rights strategy.

However, we fully understand that the sector in which we work is at particular risk of modern slavery. For this reason, we continue to work across our own operations and supply chain to undertake rigorous risk assessment and due diligence, to equip our colleagues and suppliers to detect possible situations of modern slavery and to ensure that, were it be found that our business has caused or contributed to situations of modern slavery, we work to ensure access to remedy.

We continue to be committed to reporting transparently on our work in human rights and published our first Responsible Sourcing Report in January 2021 ([here](#)). The below statement is specific to our activity on modern slavery during the period 2020-2021, is made in accordance with section 54 of the Modern Slavery Act (2015) and covers: (1) our business's structure and our product supply chains; (2) our policies in relation to slavery; (3) our risk assessment processes; (4) the steps we are taking to mitigate the risk of modern slavery, including training and awareness-raising activities; and (5) our effectiveness in relation to agreed performance indicators.

During this reporting year, Gomez, like all others in the food industry, faced the double challenges of the ongoing global pandemic and the immediate impact of the UK's exit from the EU. Both challenges had, and continue to have, potential to increase our sector and our business's risk of modern slavery, and we outline the steps we took to address this, both within our own operations and our wider supply chain, below.

1. OUR BUSINESS AND SUPPLY CHAINS

A Gomez Ltd is a private limited company based in Kent. As one of the UK's largest independent and best known produce companies, we supply the major UK supermarkets, wholesale, c-store and foodservices sectors. This reporting year, we have had three main shareholders: Jim Parmenter (Managing Director), Juan Hernandez (Grupo Paloma) and Gerardo Gomez (Frutas Esther).

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 site which employs around 800 people. The site has been developed over the years to provide a tailor-made packing and logistics service. It includes whole-head packhouses, temperature controlled storage, modified atmosphere storage, ripening rooms, an automated distribution and consolidation centre, designated quality control areas, product development facilities and main office operations. The site had its 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, but 4 examples of good practice, including the HR processes we have in place, were cited).

Our group consists of A Gomez Ltd in the UK, Grupo Hortifruticola Paloma, a shareholder and supplier based in Spain, Frutas Esther, a shareholder and supplier based in Spain, and Jolly Tom, a joint venture between A Gomez Ltd and Villa Nursery in the UK. Together, we farm over 3,250 hectares of owned production in Spain, 15 hectares in the UK and 5 hectares in the Netherlands.

In addition to our owned production, we also work with long-standing grower partners around the world, which enables us to provide the highest quality products all year round. Most of our grower partners have supplied through Gomez for over 10 years – some for over 60 years. Around 90% of our supply sits with 10 producers, which delivers economies of scale, security of supply, maximum customer focus and optimal visibility and influence down to grower level within our supply chain.

¹ See, for example, Anti-Slavery International for fuller definitions: [What is modern slavery? - Anti-Slavery International \(antislavery.org\)](https://www.antislavery.org/)



For further information on our company, please visit www.gomez.uk.

2. OUR POLICIES IN RELATION TO MODERN SLAVERY

In the previous reporting year, we outlined the way in which we overhauled a number of our policies relevant to modern slavery in line with updated best practice. These are now contained in our most recent Employee Handbook. All policies are reviewed at least annually on a continuous basis. To recap, the policies we have in place applicable to our own business in the UK are:

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 last year (now reviewed annually)

Anti-Bribery Policy: we refreshed this policy last year specific to our site and outlining obligations under the UK Bribery Act

Dignity at Work Policy: we refreshed this policy last year reaffirming our commitment to a work environment free of harassment and bullying, and where everyone is treated with dignity and respect

Equal Opportunities Policy: again, we refreshed this policy last year to support in the implementation of our commitment to ensure zero discrimination at our site

Grievance Policy: this policy was also refreshed last year and outlined our internal grievance procedure in line with good practice

No Child or 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, and have updated our eligibility to work in the UK checking process for all new Gomez employees in line with post-Brexit changes, to safeguard against human trafficking and labour exploitation

Agency Labour Policy: we refreshed this policy last year to ensure we were defining our agency relationship according to current good practice

Whistleblowing and Confidential Complaints Policy: this policy was also refreshed last year as part of our Employee Handbook update, outlining the ways in which our colleagues can raise confidential concerns and how they can expect concerns to be handled, in line with best practice guidance

The policies we have in place applicable to all suppliers in our supply chain are:

Global Responsible Sourcing Policy: this policy was first articulated last year and outlines our commitments to our people and planet in terms of human rights and environmental sustainability

Ethical Trading Policy, Global Suppliers: we have communicated this updated policy to all suppliers who confirm by signing and returning it that they have understood it and committed to implementing it within their own operations

Modern Slavery, Forced Labour and Responsible Recruitment Policy, Global Suppliers: as with the Ethical Trading Policy, we have communicated it to all suppliers and expect them to confirm their commitment to it. All new suppliers are also expected to commit to it.

Accommodation Policy, Global Suppliers: again, our requirements in terms of good accommodation where offered in our supply chain have been communicated to all suppliers and we expect them to be able to demonstrate this when we do in-person spot accommodation assessments on a regular basis

3. RISK ASSESSMENT

In our previous statement, we outlined the tools and processes we use to assess risk in our business and supply chains. These methodologies and the overall risk ratings have broadly-speaking not changed since they were comprehensively refreshed in late 2019. Please see [our 2019-20 report](#) for further detail on this. We continue to assess our suppliers in Morocco as high risk in terms of modern slavery and wider human rights risks, and our Spanish, UK and Israeli suppliers as medium, but still significant, risk.

In addition, we have continued to be alert to new and emerging risks. Aware that the changes brought about by the UK's completion of its exit from the European Union would most likely increase the risk of modern slavery and illegal working², we took a number of steps within our own business and with our UK growers. These are outlined below. Beyond our immediate packing and grower supply chain, this year we assessed our third party logistics and transport partners as particularly high risk of modern slavery and human trafficking. In response to this, we began to take a number of steps, again outlined in section (4) below.

4. STEPS WE'RE TAKING TO ADDRESS THE RISK OF MODERN SLAVERY, INCLUDING TRAINING

The programme of actions we have put in place to mitigate the risk of modern slavery is tailored to the location and the nature of the risk.

Recognising that women are often at much higher risk of modern slavery, and in line with our Equal Opportunities policy, we were pleased to become a signatory to the UN Women's Empowerment Principles during this reporting year. Being a signatory provides a useful framework going forward for all our gender-related work.

On our own site in the UK, we have a number of activities and mechanisms in place. When new starters join our business, they undertake induction training which includes a component on their rights working in the UK and at Gomez, who they can go to with any concerns during their employment with us and also show the Stronger Together 'Tackling Hidden Labour Exploitation' video. Over the course of this reporting year, 38 individuals have been trained on modern slavery as part of induction in this way.

This year, we have also rolled out a training course for all operational managers, team leaders and supervisors on site. The bespoke programme, based on the Stronger Together course for UK businesses, consists of an hour-long module

² [Brexit and modern slavery - News \(unseenuk.org\)](#)

which raises awareness of the risks of modern slavery, key signs to look out for and what to do should a case be suspected. So far, we have trained 42 colleagues in this way.

We have also updated the procedures we have in place should a suspected case of modern slavery be reported. These include a Stronger Together Investigation Checklist, a Stronger Together Worker Questionnaire in a range of languages and a Suspected Case recording template.

We have a Worker Management Committee active on site, representing a cross-section of the those working with us. We also display customer whistleblowing hotline numbers across the site to enable employees to report anything of concern to a third party anonymously, from product safety to modern slavery.

Following the release of the Just Good Work app (www.justgood.work), we have communicated the benefits of all employees downloading it in a number of ways, including displays in communal areas and canteens and through our programme of modern slavery training to operational managers, team leaders and supervisors. Over the next reporting year, we will include information on Just Good Work in induction packs and training sessions.

We display Stronger Together posters in eight languages all around our site, including in all toilet cubicles and locker rooms. These display helpline numbers for the GLAA, the Modern Slavery Helpline, the police and a confidential number at Gomez.

To coincide with Anti-Slavery Day on October 18th 2020, we communicated a new flyer and poster to all on site, detailing the signs and two-step process we have put in place on site for raising concerns. We also showed all operational managers on site a short video from the GLAA ('Modern Slavery: Do the Right Thing') to reinforce the importance of raising any concerns.

On our site, we have a partnership with only one labour provider (Staffline) and use agency labour only at certain peak times of the year. Agency employees are inducted by the agency on our behalf. Our Head of HR audits all agency files twice a year (most recently in July 2021) and aims to interview a sample of agency staff when they are on site during the working day, as part of our due diligence to ensure, for example, that no worker has had to pay for a job.

During this reporting year, our Ethical & Sustainability Manager undertook refresher training with Stronger Together, training by Sedex on indicators of forced labour and continued to be involved in the Responsible Recruitment forums.

Recognising the risk of modern slavery in our logistics and transport supply chain, we mapped all inbound and outbound logistics partners and assessed the processes we currently have in place on site. We took part in an inaugural forum hosted by Stronger Together on clandestine migrants, also attended by the Anti-Slavery Commissioner Dame Sara Thornton, the National Crime Agency and Essex Police. The information presented through this learning session demonstrated that the occurrence of clandestine migrants and the use of riskier transportation methods are increasing in the UK. Any transport of people within areas of vehicles not intended for that purpose clearly presents a risk, with migrants arriving in the UK within both accompanied and unaccompanied freight. Hauliers coming into or operating solely within the UK may become knowingly or unknowingly involved in the movement of migrants. Clearly working together with customers, suppliers, transport partners and our competitors will be key in tackling this, given we share distribution partners and networks. We have committed within our business to continuing to work with the Stronger Together group to implement any agreed outcomes.

Cascading from our sets of policies for both our own site in the UK and the rest of our supply chain, this year we have also introduced a number of updated procedures. For example, we have introduced a tailored New Supplier Mandatory Ethical Questionnaire as part of our approval process for any new supplier. This complements the information new suppliers are required to make visible to us via Sedex. It allows us to understand their risk of modern slavery and any mitigation measures they have in place, by asking for information on, for example, numbers of temporary and / or migrant workers, details of any agency or labour provider used, any accommodation offered, trade unions or worker committees present and any training specific to modern slavery undertaken.

We continue to use social audits (primarily SMETA) on a risk-assessed basis and in line with our customers' requirements. In the main, this involves all suppliers (at a minimum packhouses, but in many instances also growers and farms) in Morocco undertaking an audit on an annual basis, as our highest risk sourcing geography. Suppliers in,

for example, Spain and the UK will typically undertake an audit every two years. We also look at basic data from GRASP assessments at grower level.

However, we are fully aware of the limitations of audit and so key to our due diligence are our Technical Managers at source (Morocco and Spain). Both have undertaken immersive ETI training which included modern slavery and are present at supplier packhouses and farms every week. In Morocco, we have built a full map of the labour supply chain into our suppliers' operations in this way and assessed accommodation offered at farm level in person.

We have also continued to play an active part in the Foros Comercio Etico. Our Ethical & Sustainability Manager has been a member of the Governance Group (the strategic steering group of the Forums), the Long Term Planning Group and the Communications Hub. Our Spanish Technical Manager has chaired the new working group on circular migration, which is working with the Spanish administration to mitigate the risks, including of modern slavery, to migrant workers who tend to work for a number of different employers across the harvest season, as they move from crop to crop.

Our suppliers in Spain are active participants also in the Forums. During this reporting year, 83% of our key Spanish salad suppliers, for example, were actively participating in one or more of the Forums' working groups, on topics such as labour providers, worker management dialogue or labour standards. We have also ensured that all Spanish suppliers are aware of the resources at their disposal through Stronger Together Spain ([Stronger Together España - Stronger Together : Stronger Together \(stronger2gether.org\)](#))

In the UK, given the changes to legislation post-Brexit and the subsequent labour shortages, we worked closely with our key UK suppliers to minimise the risk of modern slavery. At least one representative from 80% of our UK suppliers have now attended Stronger Together training. All also attended sessions hosted by the Association of Labour Providers on the changes to the immigration system, right to work checks, preventing illegal working and how to deal with constricted labour availability by using only licensed labour providers through, for example, the Extra Workers Needed portal.

We also worked with UK suppliers to enhance communication about modern slavery with their own employees. Stronger Together posters in relevant languages are now displayed at grower sites and the Just Good Work app is promoted to their workforces on display boards. Our suppliers have also been encouraged to undertake the Sedex accommodation training course, to ensure that, where accommodation is offered, it is of a good standard.

In Israel, we continued to work with our two key suppliers to raise awareness on our responsible recruitment policy. Growers are required now to promote information on the specialist non-governmental support organisation which provides information on labour rights and legal support to the predominantly Thai workforce. One of our suppliers undertook a worker voice pilot with &Wider, through which valuable perspective directly from workers was received.

5. OUR EFFECTIVENESS

Last year, we set out a set of KPIs for this year, by which to assess the effectiveness of our actions on modern slavery.

For our own site in the UK, these were:

KPI set in 2020	Progress during 2021
% of new starters inducted on modern slavery during reporting year	100%
% of managers / team leaders / supervisors trained on modern slavery during reporting year	89.4%
% of packhouse and warehouse operatives trained on modern slavery during reporting year	8.3%
% improvement on Stronger Together Implementation Checklist	106.1%

We have also committed to using the Stronger Together Progress Reporting Tool on an ongoing basis, which makes our performance data visible to all our customers. Our most recent assessment showed the areas in which we were making good progress (commitment, assessing and communicating) and areas where we could continue to make progress (acting, remedy and monitoring). In all areas we compared favourably with the cohort of others in the programme.

On the basis of the improved policies and procedures we have in place, we have seen an increase in the number of investigations we have undertaken. This reporting period, we have investigated two potential cases at our own site and one at a supplier site. None of these investigations resulted in a confirmed case; however, we believe that through potential cases being raised, we can be more confident that the processes we have put in place are working.

For the rest of our supply chain, the KPIs we set last year were:

KPI set in 2020	Progress during 2021
% of suppliers who have attended / received training on modern slavery during the reporting year	In the UK: 80%
% of suppliers with mapped labour provider use / labour supply chain mapped	20% - all new suppliers must also now provide full details of their labour agencies and the ways in which they source labour as part of our refreshed approval process
% of suppliers with reporting mechanism in place	Over the reporting year, we have assessed in person the reporting mechanisms during supplier visits in the UK. Over that period, we have confirmed that 60% of our UK suppliers have a reporting mechanism specific to modern slavery. Both our Group partners in Spain have an effective reporting mechanism specific to modern slavery in place. All 33 growers in our key Moroccan supplier have worker committees in place. All Israeli growers in our supply chain display information on the labour NGO hotline on farm.

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 Managing Director on behalf of the Board of A Gomez Ltd on 30 September 2021.



Jim Parmenter, Managing Director, A Gomez Ltd