



MODERN SLAVERY ACT – The Summer Berry Company (UK)

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2019/2020

Organisation

This statement applies to The Summer Berry Company (UK) (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2019/2020

Organisational structure

The Summer Berry Company (UK) is located in West Sussex and is a leading UK grower of strawberries, raspberries, blackberries and blueberries. The business produce fruit each year for major customers including Waitrose and Marks & Spencer. Every berry that we grow has to be carefully picked and looked after to ensure that it reaches our customers in perfect condition. To achieve this, we need lots of help each year to grow the plants, harvest the berries, pack them and transport them to our customers. Over 1400 people are employed and accommodated on our farms near Chichester. At TSBCo, our people and our plants are our greatest assets and both must be nurtured to achieve success.

Our business values are based in our “ROOTS”:

Simply referring to Respect, Ownership, Openness, Trust and Support, the aim is to ensure our culture is embedded with these values and behaviours. All employees are empowered to ensure compliance with the Modern Slavery Act.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical a abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.



Commitment

We are committed to operating in an ethical manner in all that we do. Whilst we are happy that our standards are being met within the Company relating to the recruitment and employment of our team, we recognise there is scope in our supply chain for slavery and human trafficking to occur. The Organisation takes a zero tolerance approach to slavery and human trafficking. The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains. The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of seasonal workers, plants, growing, packing and picking materials from various suppliers.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its labour supply chain because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be potentially high and it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers. The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Working closely with and supporting the GLA.
- Secured the GLAA Licence
- HR Team recruiting directly from in country sources and the use of "Family and Friends"
- Keeping up to date with current trends on the subject.
- Educating our managers and team leaders on how to spot those who may be vulnerable.
- Educating our managers and representatives who visit suppliers world-wide on what to look for.
- Supporting the Stronger Together campaign.
- Reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- Having in place measures to identify and assess the potential risks in our supply chains



- Appointing a Worker Forum and running regular meetings for the Forum and management representatives
- Adopting the ETI base code, including the Code of Human Rights, Basic Working Conditions and Corporate Responsibility, to address workplace issues such as working hours, child labour, forced labour, non-discrimination, freedom of association, health and safety and the environment. This applies to our own operations, but we also encourage businesses throughout our supply chain to adopt and enforce similar policies in their own operations.
- Having a highly professional and well trained HR Department responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking, and identifying the business practices which are in place to ensure effective reporting and effective action to address modern slavery.
- Adopting an Awareness-Raising programme such as staff training, distributing flyers to employees and putting up posters across the organisation's premises on how employers can identify and prevent slavery and human trafficking, what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and what external help is available, for example through the Modern Slavery Helpline.

Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains:

- Minimum of 75% return rate of seasonal workers
- Maximum of 10% seasonal workers turnover (unplanned leavers)
- 100% pass rate on all audits

Policies

The Organisation has the following policies which further define its stance on modern slavery and assist the organisation to assess, prevent and mitigate the risk of modern slavery existing in the organisation and its supply chains - Recruitment Policy, Whistleblowing Policy, Preventing Hidden Exploitation Policy, Training and Development Policy, etc.

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, covered by the Senior HR Manager, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations. We are regularly audited by third parties who publish our results on the Supplier Ethical Data Exchange (Sedex).

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and has been approved by the Company's Chief Executive Officer. This is reviewed and updated annually.

Date of approval: 28th July 2020

David Kay
Chief Executive Officer