

Minor, Weir and Willis Limited

Modern Slavery and Human Trafficking Statement

2018/2019

Introduction

This statement has been published in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Minor, Weir & Willis (MWW) slavery and human trafficking statement for the year commencing 1 January 2018 and ending 31 December 2018. The Act makes provisions about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims. This statement articulates our policies and practices around recognising and preventing human trafficking and slavery in our supply chain.

Our Business Structure & Governance

MWW employs over 200 staff in a number of locations throughout the UK. Our workers are recruited from throughout the EU and employed in the UK. MWW is one of the UK's largest handlers of fresh produce. Established in 1963, and located in Birmingham at the heart of the UK's road and rail networks, we specialise in the procurement and growing of produce from around the World and the UK for sale in the UK and continental Europe. Our Chairman and Board of Directors are ultimately responsible for delivering our commitments on tackling modern slavery in our business and our supply chain. They are supported by our heads of procurement, human resources and technical departments, who provide updates on compliance and our approach to continuous improvement.

Our Supply Chains



We source over
70 types of fresh produce
from **250** suppliers
in more than **35** countries

We source over 70 types of fresh produce from approximately 250 tier 1 suppliers in more than 35 countries, and also work closely with British growers to offer local produce when in season. In 2016 we reviewed our approach to managing our Ethical Responsibilities within such a broad supply chain; firstly based on our UK businesses and their supply

chains which are managed by our UK human resources department and Directors. Secondly based on our global supply chains which are managed by our technical department. Our UK supply chain includes our main packing facility in Birmingham, our growing operation in Worcestershire and associated British growers. Within the UK operation MWW directly employs more than 200 staff but within the total MWW supply chain there are considerably more and it is the workers who are not directly employed by us or our suppliers, yet work within our supply chain, that we are obliged to protect under the new legislation. This is a complex task and therefore one that all tiers within our supply chain must agree to address when entering a supply agreement with MWW.



Our Policies

The cornerstone of our approach towards tackling modern slavery and human trafficking in our supply chain is our Ethical Policy, which we ensure all our suppliers sign up to annually. This policy has a strong emphasis on modern slavery and human trafficking and the prevention of stowaway's, and includes access to MWW Modern Slavery and Human Trafficking Statement, and UK Government codes of conduct for suppliers and hauliers.

Collaborative Action

Modern slavery is a complex issue and as a result it is vital that we work closely with external stakeholders including NGO's, charities, trade union organisations and our customers where ever possible.

We are members of the Association of Labour Providers in the UK whose aim is for "The provision of temporary labour to the UK food and agricultural sectors to be recognised as a model of good

practice”. We are also members of Stronger Together which is a UK multi-stakeholder collaboration between supermarkets, the Association of Labour Providers, the Gangmasters Licensing Authority, Migrant Help, industry trade associations, NGO’s, individual employers, labour providers and trade union representatives. This initiative seeks to reduce the occurrence of forced labour, labour trafficking and other forms of hidden third party labour exploitation.



We have provided our staff in the UK with helpful guidance from Stronger Together and encourage staff to contact them through the helpline numbers if they have concerns that they or colleagues are victims of modern slavery or human trafficking.

We ensure our labour providers have a GLA licence and follow the provisions of the Gangmaster Licencing Act 2004 and accordingly adhere to their main standards. The standards are that all legal requirements are met to protect workers from poor treatment and exploitation. They cover issues such as working hours, training, terms and conditions, the national minimum wage and transport to ensure our labour providers meet the basic safety and welfare standards.

As such we adhere to these standards which collectively address our commitment to human rights and the elimination of all forms of forced and compulsory labour.

This will be achieved through:

- **Raising standards** – promoting a stakeholder partnership approach to improve continuously standards of labour provision and to raise labour standards beyond base compliance.
- **Promoting growth** – raising awareness of labour providers’ contribution to supply chain efficiency through effective sourcing and supply of the workforce to plant, pick and produce our food.
- **Responsibility to workers** – supporting labour providers and users to meet their legal and ethical responsibilities to the contingent

workforce and to treat temporary and seasonal workers fairly and with respect.

- **Sustainable supply** – facilitating the definition and application of fair pay and charge rates that enable business sustainability and do not foster worker exploitation and tax evasion.
- **Proportionate regulation** – advocating proportionate regulation of labour provision that facilitates fair competition.
- **Sector support** – championing work and careers in UK agriculture and food production.

We also attend annually and participate in produce industry working groups such as the Spanish Ethical Trade Forum, who meet specifically to discuss issues and share best practice across the produce sector. We regularly attended customer workshops, this ensures that we remain abreast of all key developments in the ethical trade space.

Due Diligence and Risk Assessment

As part of MWW efforts to monitor and reduce the risk of slavery and human trafficking in our UK supply chain, our human resources department has adopted the following steps to measure the effectiveness in ensuring that slavery and human trafficking is not taking place in the business or our UK supply chain.

- Regular checks of the GLA website to ensure no issues have been raised against our labour suppliers.
- Due diligence checks on each our labour suppliers.
- Full audits using complier audit system from ALP with all labour suppliers.
- A SMETA audit carried out yearly
- Regular interviews with field workers.





We also adhere to standards of responsible conduct and train employees to treat each other with respect, and to adhere to laws, regulations and standards as referenced above. The spirit of this is embedded within our core values and behaviours charter.

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes employees are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

We are AB members of the Supplier Ethical Data Exchange (SEDEX), a not for profit membership organisation dedicated to driving continuous improvements in responsible and ethical business practices in global supply chains. We use SEDEX to help us assess risk and manage compliance across our tier 1 supply base, who are all required to be members and complete a self-assessment questionnaire (SAQ) which includes indicators of forced labour, and share visibility of this information with us as part of our basic due diligence requirements.



As a minimum requirement and a pre-requisite to supply, all suppliers to MWW must register each site of employment and fully complete a SAQ and each site must then be linked to MWW as a direct customer to provide us with transparency of employment sites, their SAQ and any independent ethical audits undertaken. MWW technical department will track the progress of suppliers in maintaining their membership status, completing and updating SAQ's, and closing out of audit non-conformances within the agreed timescales.

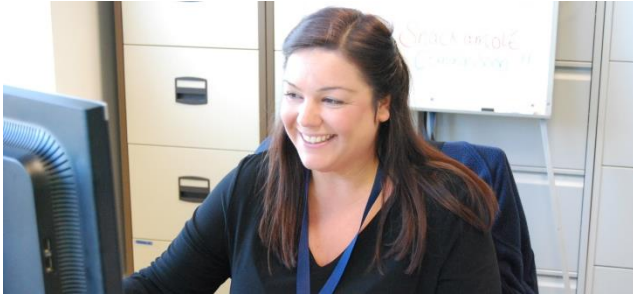
With reference to our Global supply base we constantly review our supplier ethical risk assessment and share our findings with each supplier based on the information they have provided to us and the information we have visible to us on SEDEX. Each supplier has been informed of their risk rating and their obligations to independent ethical audits, more specifically SEDEX Members Ethical Trading Audit (SMETA) and the frequency of such audits. SMETA provides a minimum standard for ethical audits, however, we provide a list of alternative and approved ethical audit standards that can only be substituted for a SMETA audit. Suppliers have also been made aware through the Ethical Policy of the criteria required to be met in order to reduce their risk rating and as such reduce the frequency of independent audits required.



We undertake to work closely with our suppliers, supporting them through the audit process where required, and help provide meaningful corrective action and remediation where an audit highlights any areas for concern. Where a supplier does not demonstrate a commitment to engage with MWW or local NGO's to resolve issues relating to modern slavery and human trafficking our ultimate sanction will be to cease trading with them.

Training and Capacity Building

Training our colleagues and our suppliers worldwide is critical in raising awareness of the issue of modern slavery in the supply chain. The fact sheet we have produced and issued to all suppliers gives them a simple guide with useful links to SEDEX briefing notes and guidance from the Ethical Trade Initiative (ETI). Our human resources and technical staff have attended several Stronger Together workshops as well as customer led ethical trade conferences and strategy meetings to ensure those staff remain in touch and up to date with modern slavery and the issue remains at the forefront of our business.



New employees to our commercial and technical departments are briefed on modern slavery as part of their induction. This briefing includes reading of literature already mentioned, an introduction to our risk assessment and due diligence processes, so they understand from the start of their career with MWW that modern slavery and human trafficking is an issue we take seriously and will not tolerate in our supply chains. This is extremely important in driving a culture of intolerance through all departments associated with the procurement and assurances of our supply chains from the moment new colleagues join.

Performance Measurement

We aim to assess continually our performance and effectiveness in tackling modern slavery through key performance indicators. We actively target reduction of risk in our supply base through a targeted approach to SMETA auditing, working with suppliers who had never had an audit before to ensure they felt supported and capable of dealing with any issues that may arise, and visiting a percentage of those suppliers to perform pre-audit work by way of preparation.



In 2017 there were no reported incidents of modern slavery or human trafficking in the MWW UK or global supply chain.

Next Steps

In 2018 we plan to reduce further our high risk supply base, increase the number of SMETA audits taking place, and encourage our primary suppliers to commit to producing their own statements on modern slavery. We will also elevate ethical risk in our supply base reviews with our commercial and procurement teams to hold a higher weighting when deciding future strategic partnerships.

Parveen Mehta

Director
Minor, Weir & Willis

Date