



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020**

### **Introduction**

This statement articulates our actions to understand all of the relevant and potential risks to the business and the steps and practices around recognising and preventing human trafficking and slavery in both our own business and our supply chain. 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 financial year 1<sup>st</sup> January – 31<sup>st</sup> December 2019.

### **Business Structure and supply chains**

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 Policies**

#### **Policy for employees**

MWW recognise the risks of Modern Slavery and have put in place a number of policies that relate to slavery and human trafficking across the business.

These include:

- Ethical Policy
- Equal Opportunities Policy
- Grievance Policy
- Whistleblowing Policy
- Anti-Bribery Policy
- Bullying & Harassment policy
- Modern slavery Factsheet
- Safe guarding Policy.

These policies provide clarity to all line managers, colleagues, agency workers and our agency labour providers on the company's standards and processes that we take in order to protect our workers from the threat of labour exploitation.

All our colleagues are also expected to comply with our Code of Conduct which describes how we aim to ensure that everyone works together in a fair and respectful way and to create an environment free from bullying, victimisation and harassment.

#### **Policy for suppliers**

The cornerstone of our approach towards tackling modern slavery and human trafficking in our supply chain is our "Ethical Policy" and "Supplier Undertaking" that all our suppliers sign annually. These documents have a strong emphasis on modern slavery and human trafficking and include access to MWW Modern Slavery and Human Trafficking Statement.



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### **Risk Assessment and Due Diligence Processes within our UK operations**

Our employment of seasonal and casual labour through agencies has been flagged as a high-risk activity as this is considered to be an area that is at high risk of slavery or human trafficking within the business. MWW will review annually the steps it has taken to address the risks of slavery and human trafficking in its business and in its supply chain, including the effectiveness of internal processes for reporting and escalation of issues.

All recruitment for permanent and fixed term employees is managed through our centralised HR function. Any new appointment is first validated by senior management and the independent HR function.

All candidates are vetted by our Human Resource Function, before they are processed as an employee. Further, HR will ensure that all employment contracts and Right to Work checks have been properly completed and that the candidate has been met in person.

Additionally, all payee details are checked monthly by our Payroll Function to identify any duplicate bank accounts and, on the first day of employment, we also conduct a visual check that the bank details provided belong to the employee.

We use temporary labour in our operations which we have acknowledged is a high-risk area for the business. To control any risk of modern slavery, we work closely with our labour providers who are all well-recognised market leaders in their field. We ensure all agencies implement robust recruitment processes to manage the risk of modern slavery in any of our temporary/ agency appointments, including vetting of a candidates identify, Right to Work documents, bank account and employment history.

Also, part of MWW's 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:

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

Anybody within our business who has a suspicion of modern slavery is encouraged to speak to their Line Manager and/or the HR department. High impact posters have been issued in key locations across the business especially areas that heavily rely on temporary labour. These are displayed prominently on staff noticeboards and in other high traffic areas to encourage anybody with a suspicion of modern slavery to call the Helpline. As an alternative, they can call our internal whistleblowing hotline which is free and anonymous, enabling both employees and agency workers to raise any potential concerns in relation to employment standards and ethics. Information on how to contact the whistle blowing hotline is prominently displayed throughout the business.

As a matter of policy, we will support any whistle-blower who raises a genuine concern, even if they turn out to be mistaken. All reports are fully investigated and, if required, preventative action completed.



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### **Modern Slavery Risk within our Supply Chain**

MWW source on a global basis from both small- and large-scale farming operations. We consider that the most significant risk of Modern Slavery and Human trafficking is in our supply chain where operations and management are outside our direct control.

The identification of risk within our large and complex supply chain is a key to understanding what support is required and prioritising corrective actions.

Our risk management steps include:

- All suppliers are required to link to us on SEDEX and complete the associated SAQ
- A full risk assessment is carried out for all suppliers with the risk calculator taking into consideration:
  - Country of origin
  - Latest audit status
  - Onsite labour splits and due diligence
  - Sedex risk rating
- Any suppliers deemed high risk are required to undertake an independent ethical audit, preferably SMETA and any corrective actions closed within the agreed timescales
- We maintain a team of skilled technical staff to support our suppliers in both their response and management of corrective actions
- Based on our risk assessment we work directly with our suppliers on a range of projects and initiatives to improve working conditions
- We are members of FNET and a number of overseas ethical forums where we actively participate and collaborate with the wider industry, sharing learnings and best practice.

### **Training and Awareness**

We are actively working to increase awareness in our Business of the presence of modern slavery in the UK. We have recently launched an e-learning training module through Stronger2gether which is available to key employees. The purpose of this module is to make employees aware of the existence of modern slavery in the UK, to help them identify the signs that someone maybe a victim of modern slavery, and to advise them of what action should be taken in the event that they identify an individual at risk.

Through this training our 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 have also developed an ethical workbook guide to our overseas suppliers, this is used to support the development and capacity building work carried out by our team of trained social lead auditors.

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### **Performance Measures and Actions**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business or supply chains we intend to take the following steps to further combat slavery and human trafficking:

- Continue to provide tailored modern slavery training within our UK operations
- Ensure effective communication of the Modern Slavery helpline and our own in-house whistleblowing line ensuring all reports are followed up and investigated fully in accordance with our policy
- Annual supplier risk assessment review to plan & support supplier development
- Continued in house & third-party auditing of our own operations targeting zero non-conformances
- Continued third party auditing of all high-risk suppliers ensuring all non-conformances are addressed and signed off within agreed timeframes.
- Ensure ethical training reaches priority supply chains

P. Mehta -

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