



# Modern Slavery Statement

2025

Minor, Weir and Willis



# Introduction

MWW is committed to preventing modern slavery and human trafficking in all aspects of our business and supply chains. This statement outlines the actions we have taken during the 2025 financial year to identify, mitigate and address the risks of modern slavery within our operations and global supply network.

This statement has been published in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the MWW slavery and human trafficking statement for the financial year 1st Jan – 31st Dec 2025.

## Business Structure & Supply Chains

MWW is a UK based produce procurement, farming and supply business headquartered in Birmingham. We farm in multiple locations, including the UK, and also source fresh produce from international markets to supply customers across the UK and continental Europe. Our operations involve relationships with growers, packers, logistics providers and labour agencies across multiple countries.

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 fully committed to playing their part in helping to eradicate modern slavery and supporting ethical labour practices across our supply chain. They are supported by our heads of procurement, human resources, technical and wider management teams who provide updates on compliance and support our approach to continuous improvement.



## Our Policies:

MWW is committed to upholding the highest standards of ethical conduct and integrity in all aspects of its operations. As part of this commitment, we have implemented robust policies to prevent and combat modern slavery and human trafficking within our operations and supply chains. The policies and procedures are based on the recognised standards of the ETI base code, the UN guiding principles on Human Rights and the UK Modern Slavery Act.

These policies and procedures are regularly reviewed and amended to ensure we continually move forward in our goals.

These include our:

### Worker Protection Policies

- Equal Opportunities Policy
- Bullying & Harassment Policy
- Safeguarding Policy

### Reporting and Transparency

- Whistleblowing Policy
- Grievance Policy

### Ethical Business Conduct

- Ethical Policy
- Anti-Bribery Policy
- Supplier Code of Conduct

### Operational Compliance

- Health & Safety Policy
- Prevention of Illegal Working Policy
- Human Rights Policy

These policies provide clarity to line managers, colleagues, agency workers and our agency labour providers on the company's standards and processes that are applied in order to protect our workers from the threat of labour exploitation. By adhering to these policies and principles we seek to contribute to the global effort to eradicate slavery and human trafficking and uphold the rights and dignity of all individuals within our operations and supply chain.

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

## Grievances and Whistle-blowing

MWW encourages anyone within our business who has a suspicion of modern slavery to speak to their Line Manager and/or the HR department, additionally a confidential helpline has been set up. High impact posters have been issued in key locations across the business, especially in areas that rely heavily on temporary labour. Posters are also displayed prominently on staff noticeboards and in other high traffic areas to encourage anybody with a suspicion of modern slavery to call the helpline. Our whistleblowing hotline, which is free and anonymous, enables both employees and agency workers to raise any potential concerns in relation to employment standards and ethics.

On top of raising awareness via posters, toolbox talks, the induction process and training, we also have quarterly worker representative meetings and focus groups in which issues can be raised and discussed.

As part of our commitment to ethical business practices, we encourage employees and stakeholders to raise any genuine concerns in good faith. All reports are taken seriously, investigated thoroughly, and, where necessary, appropriate corrective and preventative actions are implemented.

Grievance mechanisms and access to remediation are a key part of our due diligence and management controls. All workers are encouraged to submit feedback either directly, through their Line Manager, or anonymously via our whistle-blower helpline. There are no boundaries to the issues that the workers can raise, they could include issues such as product safety, integrity, quality or legality, working conditions, pay, living arrangements and the recruitment process. All feedback is investigated and followed up as appropriate and anonymously shared with the senior leadership team.

The business maintains clear reporting mechanisms through its Grievance and Whistleblowing Policies, enabling workers and third parties to raise concerns confidentially and without fear of retaliation. All reports are logged, investigated, and addressed in line with established procedures. No formal grievances relating to modern slavery were raised during the reporting period; however, we recognise that low reporting can indicate potential barriers to disclosure. We are therefore continuing to strengthen our worker voice mechanisms by improving accessibility to reporting channels through multilingual communications and mobile-enabled options, including the promotion of tools such as the *Just Good Work app*, which provides workers with accessible information on their rights and routes to raise concerns.

## **Due diligence**

MWW requires compliance with our policies and procedures relating to modern slavery and worker welfare from all our labour providers, agencies, and suppliers. We continue to work with and assist our supply chain to implement their own relevant policies and procedures to help identify and manage their supply chain risks. We look to create long-term partnerships that develop a working environment that overcomes modern slavery and drives ethical labour practice as its foundation.

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 the MWW Modern Slavery and Human Trafficking Statement.





In addition to the above policies, we have also created a range of guidance documents to support our suppliers and help tackle some of the most challenging issues in our supply chain, these guidance documents include Gender Discrimination Guidance, Heat Stress & Prison Labour with further development planned for 2026.

The use of seasonal and agency labour is identified as a higher-risk area for potential modern slavery and human trafficking within our operations. Broader global challenges, including conflict, persecution and socio-economic hardship, are contributing to increased migration and displacement. These conditions can heighten vulnerability and may result in individuals relying on informal or unregulated labour networks.

MWW will annually review the steps it has taken to address the risks of slavery and human trafficking in its business and supply chain, including the effectiveness of internal processes for reporting and escalation of issues. It is our vision for all workers to be fairly treated and to ensure that their working conditions and environments are safe and secure giving workers the freedom to develop and grow within the business.

All recruitment for permanent and fixed term employees is managed through our centralised HR team, all of whom are fully trained through Stronger Together in the ethical and professional recruitment of workers.

All candidates are vetted by our Human Resource team, before they are inducted as an employee.

Furthermore, HR will ensure that all employment contracts and right to work checks have been properly completed and the candidate has been met in person.

All payee details are checked monthly by our payroll team 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 business. To control risks 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 and that they align with the responsible recruitment guidelines, including the vetting of a candidate's identity, right to work documents, bank account and employment history.

As 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 engaged with the wider industry and a number of other industry partners such as FNET, The ALP & Stronger Together to ensure we are working in line with current best practice guidelines:

- Monthly checks of the GLAA website to ensure no issues have been raised against our labour suppliers.
- Due diligence checks on our labour suppliers, a minimum of two per year.
- Annual audits are carried out on all labour suppliers using the ALP Complier audit system, unless they are registered with the Responsible Recruitment Progress Assessment developed by Stronger Together and the Seasonal Worker Scheme Taskforce. The process includes a self-assessment by scheme operators to demonstrate management controls, followed by an independent assessment involving source country and client farm visits.
- A SMETA audit is carried out annually at each of our packing sites with GRASP accreditation for our farming operations.
- We actively promote and encourage the use of the "Just Good Work" app.





## Modern Slavery Risk within our Supply Chain

We are committed to identifying and addressing human rights risks wherever they arise and maintain a zero-tolerance approach to modern slavery. In line with the UN Guiding Principles on Business and Human Rights (UNGPs), we focus on our most significant, or 'salient', human rights risks—those with the greatest potential for severe negative impact through our operations and business relationships.

To support this, we conduct a structured risk assessment using the SEDEX platform, which evaluates and ranks risks by type, enabling us to prioritise areas requiring the most attention and resource.

While this approach allows us to focus on the most critical risks, it does not exclude other human rights concerns, which continue to be monitored and managed as part of our broader due diligence processes.

Our current salient human rights risks are:

- Health and Safety
- Working Hours
- Discrimination – including fairness in the workplace, diversity and equal opportunity
- Forced Labour

We are aware of the limitations of audits and are determined to strengthen the understanding that we have through our own structured visits, partnerships with local NGO's, collaboration with the wider industry. Our support tools include ethical workbooks and guidance documents, direct technical support and training programs aimed at building capacity within our supply chain.

MWW is a member of the Food Network for Ethical Trade (FNET), a collaborative initiative established by UK food companies to improve human rights and labour standards within global food supply chains. Through our membership, we work with suppliers, retailers and industry partners to identify, assess and address ethical trade risks, including those related to modern slavery and responsible recruitment. FNET provides a platform for collaboration, knowledge sharing and the development of practical tools and guidance to strengthen due diligence and promote continuous improvement in working conditions across the food sector. Our participation supports our ongoing efforts to identify salient human rights risks and to work collectively with industry partners to drive positive change within our supply chains.

We also ensure that all suppliers are subject to an annual risk management process focused on ethical risk.

Our risk management steps include:

- Each supplier is risk-assessed using a structured methodology which considers country risk, labour intensity, audit performance, and SEDEX/FNET risk ratings. Suppliers identified as higher risk are prioritised for enhanced due diligence and independent ethical audits.
- We maintain a team of skilled technical staff to support our suppliers in both their response and management of corrective actions. We also provide tailored training materials and support for suppliers in line with the latest requirements and legislation.
- Based on our risk assessment we work directly with our suppliers on a range of projects and initiatives to improve working conditions.





## Training and Awareness

Training is an integral part of our strategy in raising the profile of modern slavery and forced labour risks within our business and supply chain. We are actively working to increase awareness in our business of the presence of modern slavery in the UK and beyond. During the reporting period, the business continued to strengthen employee awareness of modern slavery and labour exploitation risks through externally recognised training.

We have delivered externally provided 'Tackling Modern Slavery' training to relevant employees since 2023, including programmes delivered by the Stronger Together initiative. Participants include colleagues across HR, technical, and operational support functions.

Training completion is formally recorded where certification or attendance confirmation is provided, and refresher and advanced training is planned to maintain up-to-date knowledge across relevant roles.

We used an e-learning training module internally to improve the knowledge and understanding of key employees and have continued to run targeted training to our employees who have direct management of workers in our supply chains. The purpose of this module is to raise employee awareness 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 suspected breaches of the organisations anti-slavery and human trafficking policy.

Employees are trained in 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.



## Training and Awareness Overseas

We are members of a number of overseas ethical forums for example Spain, Morocco and Egypt, where we actively participate, provide financial support and collaborate with the wider industry sharing learnings and best practice.

Further information of our overseas work is detailed in the progress update below.

## Performance Measures and Actions Progress Update:

Below is an update on the next steps that were set in the previous year

### **Continue to provide tailored modern slavery training within our UK operations**

We have developed an internal e-training platform that helps to support our ongoing training objectives ensuring we have accessible and convenient training opportunities for all our employees. We have also updated a number of our refresher training documents to also include videos of the training to help support understanding.

### **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**

These channels are promoted during employee inductions and reinforced through regular updates via posters, digital information screens and company communications, including our internal newsletter. We have also embraced the industry recognised Just Good Work app, promoting its use across our operations to provide workers with accessible information on their rights and clear guidance on how to raise concerns.

### **Annual supplier risk assessment review to plan & support supplier development**

Our supplier risk assessment process continues to underpin our management of supply based ethical risk. MWW continue to be involved in projects both in the UK and overseas to support supplier and industry advancement. Examples of this work include worker voice assessments in multiple locations, gender projects in Costa Rica & Kenya, Moroccan accommodation standard development and second party assessments in Egypt.

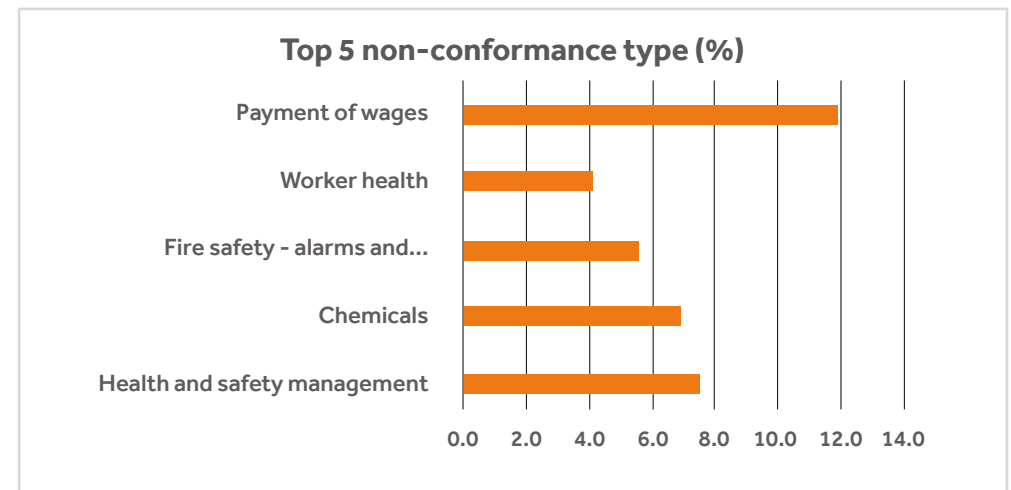
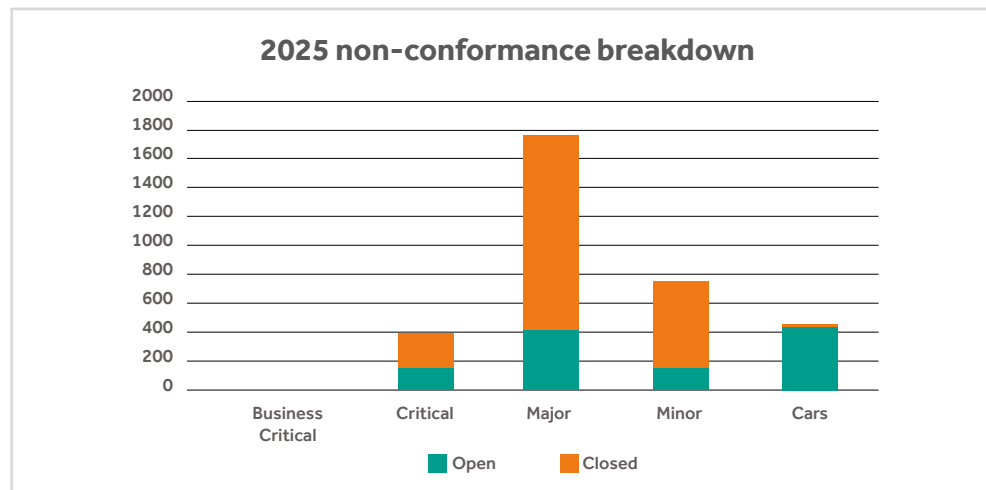


## Continued in house & third-party auditing of our own operations targeting zero non-conformance

We have continued our auditing program within our own operations throughout 2025 ensuring that any issues that have come to light are rectified and closed off. All active suppliers are subject to an annual modern slavery and ethical risk assessment, carried out by trained personnel using the company's agreed supplier risk assessment process. This includes the use of recognised third-party tools and supplier undertakings, with compliance reviewed on an ongoing basis. As a result, 100% of active suppliers are risk assessed against modern slavery and labour exploitation risks.

## Continued third party auditing of all high-risk suppliers ensuring all non-conformances are addressed and signed off within agreed timeframes

In 2025, a total of 634 SMETA third party audits were carried out within our supply chain, other 3rd party ethical assessments include Rainforest Alliance, Fairtrade and GRASP. The table below summarises the most common SMETA findings found during these audits.



During 2025, a total of 4919 improvements were made within the MWW supply chain following 3rd Party SMETA audits (excluding observations). Payment practices remain an important focus area within our ethical compliance programme. The majority of identified findings relate to the gap between minimum wage and living wage levels. In all cases, legal minimum wage requirements were met as a baseline. This trend has been influenced by the introduction of SMETA 7, which places increased emphasis on living wage considerations and has resulted in greater visibility of these gaps

We are actively supporting suppliers in progressing towards living wage standards through continuous improvement initiatives, including the development and rollout of a Living Wage Support Workbook. This provides a structured framework to help suppliers assess current practices and implement medium- to long-term plans for adopting living wage payments.

## **Ensure ethical training reaches priority supply chains**

Ethical training and capacity building at source both remain at the heart of our approach to raising standards within our own operations and within our supply base. Our UK based team and those overseas continue to carry out of source visits engaging directly with our growers and suppliers.

Supplier visits to over 13 countries visiting multiple suppliers allowed direct supplier engagement, 2nd party audits and training sessions.



## Next Steps

We will continue to review the effectiveness of our policies, procedures and training so that we can reduce the risks of modern slavery and human trafficking within our business and supply chain. Our work on modern slavery cannot stand still. Over the next year we will focus our efforts on:

- Continue our focused project work within our supply base.
- Further develop our supplier risk assessment methodology to better identify emerging labour risks in high-risk sourcing regions.
- Continued third party assessments of all high-risk suppliers ensuring all non-conformances are addressed and signed off within agreed timeframes.
- Ensure ethical training reaches priority supply chains.
- Continued in house and third-party auditing of our own operations with a target that any issues that have come to light are rectified and closed off.
- Broaden the scope of modern slavery training to include additional operational roles, while introducing refresher training for all relevant employees, with a particular focus on procurement teams



**David Alder**  
Director  
**Minor, Weir & Willis**  
31 March 2026