

Modern Slavery Statement

2023/24

Minor, Weir and Willis



Introduction

This statement articulates our actions to understand all of the relevant and potential risks to the business, the steps and practices around recognising and preventing modern 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 1st January – 31st December 2024.

Business Structure & 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, both in the UK and from around the World 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 fully committed to playing their part in helping to eradicate modern slavery and supporting ethical labour practices across all of our sites. 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:

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:

- Ethical Policy
- Equal Opportunities Policy
- Grievance Policy
- Whistleblowing Policy
- Anti-Bribery Policy
- Bullying & Harassment Policy
- Modern Slavery Factsheet
- Safe Guarding Policy
- Supplier Code of Conduct
- 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 heavily rely 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 a matter of policy, we 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.

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.

In 2024, we had no grievances raised, our grievance mechanisms are designed to be open and transparent and in line with the ACAS grievance procedure.

Policy for suppliers

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 own 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 2025.





Employment of seasonal and casual labour through agencies is considered to be an area that is at high risk of slavery or human trafficking within the business. Several global risks have impacted the prevalence and dynamics of modern slavery. Conflict, persecution and socio-economic hardships are impacting migration and displacement of individuals, forcing millions of people into a precarious legal status and a reliance on informal networks for survival.

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.

Any new appointment is first validated by senior management and the independent HR team.

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 the 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 each of our labour suppliers, a minimum two per year.
- Full audits using complyer audit system from the ALP are carried out annually with all labour suppliers.
- ASMETA audit carried out annually at each of our sites with GRASP accreditation planned for our farming operations in 2025.
- Actively promoted and encouraged the use of the "Just Good Work" app.



Modern Slavery Risk within our Supply Chain

We are determined to address our human rights issues wherever they arise and have a zero-tolerance approach to modern slavery. In line with the UNGP Framework, we have continued to focus on our salient human rights issues. These are the human rights that are at risk of the most severe negative impacts through a company's activities or business relationships.

We have approached a salient risk assessment using SEDEX RADAR which produces scores by risk type, producing a ranking of risks to determine priority actions.

Our four salient issues are those that stand out because of their significant potential negative impact (or 'salience') through our activities or business relationships.

This process does not downplay or ignore other key human rights risks, but aims to focus time and resource on areas where we can achieve the most benefit and impact.

1. Health & Safety
2. Working Hours
3. Discrimination – fairness in the work place, diversity & equal opportunity
4. 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.

Whilst our focus is on the salient issues, we are also vigilant to new or emerging issues, and these are captured through collaboration with the wider industry through organisations such as FNET.

In addition to these key focus areas, we also ensure that all suppliers are subject to an annual risk management process focused on ethical risk.

Our risk management steps include:

- All suppliers are required to link to us on SEDEX, complete the associated SAQ's and review the answers annually as a minimum.
- 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 & FNET country risk rating
 - MWW audit and visit actions
- Any suppliers deemed high risk are required to undertake an independent ethical audit, 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. We also provide tailored training materials and support for suppliers using our Ethical workbook which is reviewed regularly ensuring it remains 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.

We use 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 may be 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 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

We have continued to maintain and strengthen our communication of the modern slavery helpline and our own in-house whistleblowing line over the past year. This has been communicated out in the induction as well as updates via posters and information screens across the business and in our newsletter.

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.

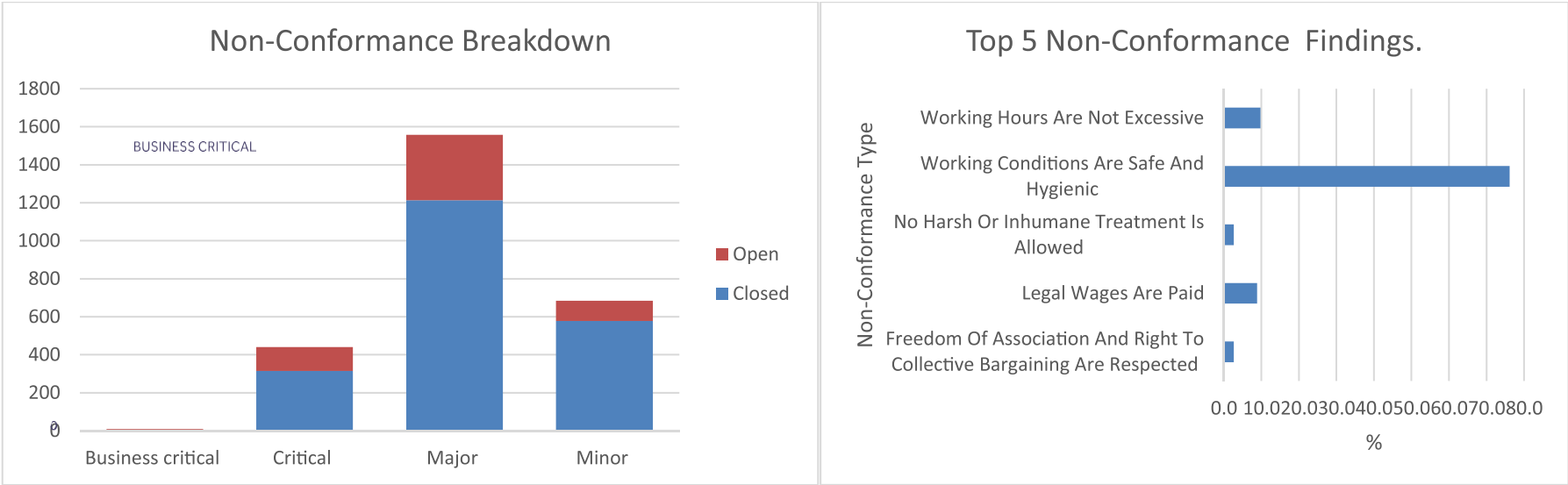


Continued in house & third-party auditing of our own operations targeting zero non-conformances

We have continued our auditing programme within our own operations throughout 2024, ensuring that any issues that have come to light are rectified and closed off.

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

In 2024, a total of 634 SMETA 3rd 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 2024, a total of 2109 improvements were made within the MWW supply chain following 3rd Party SMETA audits (excluding observations).

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 to address our identified salient risks.
- Maintain our supplier risk assessment to ensure effective on-going risk management.
- Continued 3rd 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 3rd party auditing of our own operations with a target that any issues that have come to light are rectified and closed off.
- Continue to provide tailored modern slavery training within our UK operations.



David Alder
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