



2021/22

Modern Slavery Statement

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 2022.

We are aware of the impact that the COVID-19 pandemic has had on everyone and in particular has created more challenges in some areas of the business. Our global supply chains have also more recently been disrupted due to the war in Ukraine. With this in mind we are committed to ensuring all workers across our sites are treated ethically and fairly and supporting them in navigating these uncertain times.

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

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. 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.

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. 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. 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. Information on how to contact the whistleblowing hotline is prominently displayed throughout the business.

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.

In 2022, four grievances were investigated and successfully closed out, our grievance mechanisms are designed to be open and transparent and in line with the ACAS grievance procedure.



Our Policies

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.

Risk Assessment and Due Diligence Processes within our UK operations

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. This risk has increased over the last few years due to both COVID-19 restrictions, Brexit and the war in Ukraine. 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. It is our vision for all workers to be fairly treated and to ensure that their working conditions are safe and secure environments to give them 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 processed as an employee. Further, 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 in any of our temporary/ agency appointments, including 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.
- A SMETA audit carried out annually at each of our sites.
- Actively promoted and encouraged the use of the “Just Good Work” app
- Bi-weekly interviews with field & seasonal Packhouse workers covering all of the key indicators for modern slavery.



Our Policies

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 focussed 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 the SEDEX RADAR tool 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 and collaboration with the wider industry.

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 focussed on ethical risk.

Our risk management steps include:

- All suppliers are required to link to us on SEDEX and complete the associated SAQ's.
- 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
 - 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.
- 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 for a number of overseas ethical forums for example Spain & Egypt, where we actively participate and collaborate with the wider industry for, sharing learnings and best practice.



Our Policies

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.

We used an e-learning training module through Stronger2gether 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. Each year we have increased the number of managers and supervisors that have taken part.

Training and Awareness Overseas

COVID restrictions continued to limit the travel plans in 2022 but the use of overseas team members coupled with online events has ensured that capacity building has been maintained. MWW continue to be involved in projects to support our overseas suppliers such as Gender Sensitive Audit trails in Morocco & Egypt, collaborative work to further develop audit standards in Zimbabwe and Worker voice trials in multiple locations including our own farms in the Dominican Republic.





Performance Measures and Actions

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

Due to the impact of COVID-19 on our workforce and social distancing constraints we had to pause some of our planned training in 2022. However, this is being picked up in the coming year to ensure our long-term commitments are achieved and this pause to the training is remedied.

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 through an awareness-raising programme across the business.

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. Supplier visits restarted mid-way through 2022 allowing direct supplier engagement and recommencement of 2nd party audits and training sessions. 3rd party ethical audits scheduling eased and is reflected in the increased numbers carried out with supply base.

A summary of progress to date is detailed on the next page:

Salient Risk	Focus Country	Update
Forced Labour	UK	RRT self assessment tool completed, incorporating policy development, remediation policy pending "Good Practice Guidance for Seasonal Workers" Implemented applicable requirements ALP/FNET engagement, sharing and collaborating on best practice Worker interviews in place, no adverse reports 2022 Complier audits completed for 2022 for all labour providers
	Zimbabwe	Collaborative work with Partner Africa and other stakeholders to review protocol for Financial Due Dilligence & Prison Labour assessments.
	India	&Wider – second call cycle completed and associated training rolled out
	Brazil	6 Monthly visits to source to support and follow up work being done. Visit in March consisted of 'train the trainer' sessions.
Working hours	Colombia	Training and capacity building completed, visit planned for 2023
	Egypt	In country resource for this region engaged and following up specific workstreams Egyptian Forum – opportunity to share best practice – now re-established and meetings fully supported by MWW suppliers and our UK team, the first one after Covid held on 13th Oct 2022 2nd party MWW visits – completed October 2022
	Morocco	Review SMETA NC & third party data to identify key issues – COMPLETED Visit planned for 2023
Discrimination	Morocco	Gender sensitive SMETA audit pilot sponsored by MWW, completed, learnings paper released Visit 2023 to assess next steps
	Egypt	Gender sensitive SMETA audit pilot sponsored by MWW, completed, learnings paper released Visit 2023 to assess next steps
	Kenya	Review SMETA NC & third party data to identify how seasons and growers are affected. – Completed, no major issues flagged Lack of robust data to show any particular vulnerable group under Discrimination has been flagged on any of the SMETA audits. Farm work engagement tools in use, quarterly reporting in place Engagement and representation at industry ethical trade round table events
	Dom Rep	Cycle 3 &Wider took place. Increase of 379% participation from 2021 to 2022. Training conducted on financial literacy
Health and Safety	Zimbabwe	&Wider worker engagement project planned for 2023 season
	Peru	Potential collaborative project focussing on Health & Safety with the wider industry – pending

Progress Update

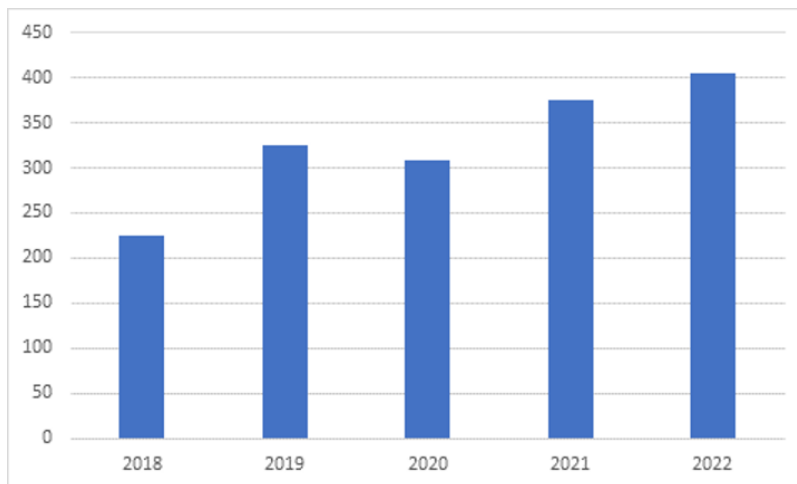
Continued in house & third-party auditing of our own operations targeting zero non-conformances

We have continued our auditing programme throughout 2022 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.

The table below summarises the numbers of audits that have taken place within our supply chain showing a significant increase in 2022

Number of supplybase ethical audits conducted.



The map below illustrates the scale and distribution of our audits across the world.





Progress Update

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. With the lifting of travel restrictions our UK based team and those overseas will be seeking to carry out an increased number of source visits engaging directly with our growers and suppliers. .





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;

- Focussed project work to address our identified salient risks
- Annual supplier risk assessment to ensure effective on-going risk management
- 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
- Continued in house & third-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

A stylized, handwritten signature in black ink, appearing to read 'DAVID ALDER'.

David Alder
Director

Minor, Weir & Willis
29th April 2023

