

# Modern Slavery and Human Trafficking Transparency Statement

Making every day taste *better*

For the financial year ended 25 September 2020

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# 1. Introduction

Human rights abuse is an area of growing concern — not just in our global supply chains, but within UK food manufacturing operations. Greencore Group plc and each of its subsidiaries ('Greencore' or 'the Group') is deeply committed to respecting and safeguarding the people who work for us, with us, or who are affected by our activities.

We are fully committed to playing our part in eradicating modern slavery and we firmly advocate for transparency and collaboration to eliminate this kind of activity.

The UK Modern Slavery Act 2015 (the 'Act') requires certain businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains.

This statement outlines the steps we take as a business to prevent slavery and human trafficking in our own operations and supply chains for the financial year ended 25 September 2020 ('FY20').

In FY20, as part of the development of our sustainability strategy, we liaised with multiple stakeholders across various disciplines to conduct a sustainability materiality assessment. Risks surrounding human rights and modern slavery were identified as material sustainability issues, demonstrating the importance of this growing global issue.

We recognise and understand our responsibility to prevent, mitigate and remediate where necessary the risks of human trafficking, forced, bonded and child labour and to respect human rights in our operations and our supply chain. Our commitment to our stakeholders is very clear - we will always treat people in our business and supply chain fairly and with respect. We continuously review and improve our practices to ensure that we have effective responses to prevent and remediate any negative impact on human rights.

This statement is made in accordance with Section 54, Part 6 of the Act (2015). It details each Greencore entity to which Section 54, Part 6, applies (defined below and referred to collectively in this statement as 'Greencore') and the steps taken during the reporting period to ensure that slavery and human trafficking are not taking place within Greencore or Greencore's supply chain.

The Greencore entities to which the Modern Slavery and Human Trafficking Transparency

Statement for FY20 applies are:

- Greencore Food to Go Limited
- Greencore Grocery Limited
- Greencore Prepared Meals Limited
- Freshtime UK Limited

This statement, which is subject to annual review, has been reviewed by senior management and has been reviewed and approved by the Board of Directors of each of the entities covered under the Act.

Signed:

**Guy Dullage**  
**Group Chief People Officer**  
**and Director of:**

Greencore Food to Go Limited  
Greencore Grocery Limited  
Greencore Prepared Meals Limited  
Freshtime UK Limited





# 2. Our Business

## 2.1 What we do

We are a leading manufacturer of convenience food in the UK and our purpose is to make every day taste better. We supply all of the major supermarkets in the UK. We also supply convenience and travel retail outlets, discounters, coffee shops, food service and other retailers. We have strong market positions in a range of categories including sandwiches, salads, sushi, chilled snacking, chilled ready meals, chilled soups and sauces, chilled quiche, ambient sauces and pickles, and frozen Yorkshire Puddings.

We employ approximately 12,200 colleagues across our operations, which consist of 21 production units at 16 locations, four regional distribution centres and 14 transport hubs. In FY20, we produced 619 million sandwiches and other food to go products and created more than 700 new recipes.

In November 2020, we launched both our new corporate purpose 'Making every day taste better' and our sustainability ambition, which are designed to help people enjoy

food in a way that enhances their health and wellbeing while inspiring their passion for a better world. This specifically includes the protection and enhancement of human rights.

More information on our business can be found in our 2020 Annual Report and Financial Statements which can be accessed at [www.greencore.com](http://www.greencore.com)

## 2.2 Our Purpose

Within our business, the work we do to address modern slavery and human trafficking is part of our wider holistic corporate purpose, and features as a key component of our sustainability strategy.

In recent years, this purpose was articulated through the Greencore Way, which we use as a model to ensure that we put People at the Core of everything we do, deliver Great Food

for our customers and consumers, drive Excellence in the way we operate and do all this with Sustainability in mind. Our new corporate purpose, 'Making every day taste better' builds on this. Together with our sustainability strategy, which includes human rights, it marks a new chapter for the business.

For us, purpose and sustainability are interconnected. By sharing and reflecting what makes us different

– People at the Core, Great Food, Excellence, and Sustainability – our people will help us bring our purpose to life. Our people are the single most important element of our organisation. They bring ideas and inspiration to the table, and deliver the processes, services and values that underpin our core proposition.



## 2.3 Our Supply Chain

One of our stated aspirations is to source every ingredient from a sustainable and fair supply chain by 2030. To achieve this, we need to build greater visibility across our supply base – we know that there may be challenges regarding the potential for modern slavery and human trafficking within supply chains and the detailed tools that we use to assess this are described further in this report.

Our central purchasing team sources from over 2,500 different suppliers and we source the majority of our raw materials from suppliers based in the UK. In many cases, we have long-term strategic partnerships in place to help build and support effective, fair and transparent supply chains. Approximately one half of Greencore's total purchasing spend is on food ingredients, with the remainder being spent on packaging and other items.



# 3. Our Policies and Governance

## 3.1 Policies

We are committed to conducting our business with the highest level of honesty and integrity. Our Code of Ethics and Business Conduct sets out the principles we rely on to carry out our day-to-day activities, which is publicly available at [www.greencore.com](http://www.greencore.com).

We believe in transparency and have set out our ethical policy and commitments in the Greencore Ethical Code & Employment Standards Policy, which is also publicly available at [www.greencore.com](http://www.greencore.com).

We recognise that our business activities have the potential to impact our key stakeholders and therefore they have the right to expect high standards in what we do.

### As a Group, we commit to:

- Ensuring that all products manufactured and sourced by Greencore are produced under working conditions that are hygienic and safe;
- Ensuring that all workers involved in the production of products sold by Greencore from direct and indirect suppliers and our own service providers are treated with dignity and respect;
- Acting in an ethical manner within all legal requirements and the highest standards and ensuring all legal requirements are met.
- Implementing the principles of the Ethical Trading Initiative Base Code.

## 3.2 Governance

We have developed a clear governance process for handling modern slavery and human trafficking challenges both within our operations and our supply chains. Our corporate purpose and sustainability strategy are set by the Board of Greencore Group plc ('the Board'). The Board monitors our overall sustainability performance against our stated ambition and targets. The Board also reviews potential risks and opportunities associated with our sustainability strategy and corporate purpose.

In order to guide and support our Group Technical function in relation to sustainability matters, we have appointed a Non-Executive Director as Sustainability Engagement Director. Part of this role involves the review of the Group's sustainability objectives, procedures and performance.

The Group has established a Sustainability Steering Committee comprising of leaders from various functions within the Group. Part of the Sustainability Steering Committee's role is to monitor progress on our

sustainability initiatives and delivery of our sustainability strategy. Reporting to this Committee are six Sustainable Business Management Groups ('SBMGs') that provide a cross-functional forum to develop and steer our strategy at an operational level. The SBMGs cover human rights and ethical trade, responsible sourcing, environment and food waste, product packaging, communities and product health and nutrition.

The Ethical Trade SBMG meets at least four times a year to exchange knowledge and best practice, to align strategic thinking and to provide recommendations for the Sustainable Steering Committee to consider. It is made up of senior executives and representatives from the Human Rights; Technical; HR; Company Secretariat & Legal; Sustainability; and Operations functions, who collectively have responsibility for driving action across all tiers of the business through the implementation of specific improvement plans at Group, business unit and site level.





### 3.3 Employment Standards

Our employment standards are defined in the Greencore Ethical Code & Employment Standards Policy, available at [www.greencore.com](http://www.greencore.com), which is informed by the International Labour Organisation ('ILO') Declaration on Fundamental Principles and Rights at Work. Greencore is committed to ensuring that within our business:

- No forced, bonded or involuntary labour is used;
- No child labour is used;
- All colleagues have a right to join a recognised trade union;
- Working conditions are safe and hygienic;
- No discrimination is practised; and
- No acts of harassment, threats, abuse or intimidation occur.

To underpin these employment standards, Greencore is a member of the Supplier Ethical Data Exchange ('SEDEX'). Each site is SEDEX registered and has completed a self-assessment questionnaire. All sites have regular independent ethical audits.

All employment agencies with whom Greencore has contracts to supply temporary workers must demonstrate a commitment to the requirements of the Greencore Ethical Code & Employment Standards Policy. They must ensure that all temporary workers supplied to Greencore are eligible to work in the UK, understand our Health & Safety and Food Safety practices and requirements, as well as their contractual documents. We work closely with these agencies to audit and monitor their compliance as well as share best practice for worker welfare and approaches for addressing modern slavery or labour exploitation risks.



# 4. Assessing, managing and mitigating risk

## 4.1 Risk assessment processes

We are aware that there may be the risk of modern slavery or human trafficking within supply chains. Our supply chains are complex, large, and international. During FY20, we completed a risk assessment of our ingredient supply chain using the Food Network for Ethical Trade Human Rights Risk Assessment Tool.

This tool is maintained by a collaborative group of retailers, suppliers and human rights experts. It uses data from sources

including the U.S. Department of Labour, the Walk Free Foundation, and the International Trade Union Confederation, to establish the human rights risk of ingredients based on their country of origin and known challenges within the product sector. The purpose of the risk assessment is to identify those supply chains with the greatest risks and thus steer our ongoing engagement plans where we can bring the most benefit and demonstrate effectiveness.

## 4.2 Our priority supply chain risks

The risk assessment process identified ten areas for priority focus from a human rights perspective:

Fresh Produce	Frozen Produce
Chicken	Warm-water Prawns
Processed Tomatoes	Soya
Tuna	Palm Oil
Herbs & Spices	Rice

These priority areas may change as we go through the process of engaging with suppliers and as we learn more about the challenges that workers in these supply chains face. We do not directly buy soya or palm oil, but they play such a key role as ingredients within the food that we buy (or as animal feed) that the risks within these supply chains have been included.





## 4.3 Managing and mitigating risk

### External Reporting: “Whistleblowing”

Greencore provides an independent, external reporting hotline, which is free, anonymous and confidential, whereby any individual in Greencore, or indeed any third party, can raise concerns in relation to employment standards, ethics or any other impropriety or area of concern. The contact details for the hotline are displayed in prominent areas throughout all of Greencore’s sites and on the Greencore intranet and extranet. The nature of the calls received by the external reporting hotline are monitored and all concerns are investigated where appropriate and reported upon to the Audit and Risk Committee of the Board on a regular basis.

### Stronger Together

We believe that collaboration and transparency are vital to address the challenge of modern slavery. Greencore supports the “Stronger Together” campaign, which is a multi-stakeholder initiative aimed at reducing modern slavery.

We are committed to building knowledge within our teams and

members of the Technical, Purchasing and HR functions in the UK have attended Stronger Together training sessions. We want to increase our understanding of the nature of hidden labour exploitation and also prevent its occurrence within our Group. The resources provided by the Stronger Together campaign, including multi-lingual posters and leaflets, are available throughout our Greencore sites.

### Supplier Management

We have complex supply chains with multi-national suppliers who we encourage and support to operate to the same ethical standards that we employ ourselves.

Greencore and our agents have made a commitment to trading fairly by agreeing clear contract terms with suppliers. The livelihood of vulnerable companies should not be jeopardised by unfair contractual dealings. We believe that stable business relationships will allow us to develop robust partnerships to address ethical risks.

Greencore works with suppliers to build effective and transparent supply chains. We are reliant on our suppliers for the ingredients and services we use

to create great food. We have a rigorous supplier approval process, operated by Purchasing and Technical functions. This process includes an ethical trade component and suppliers are provided with a copy of our Ethical Trade Policy, which is aligned to the Ethical Trading Initiative Base Code.

The Greencore Standard Terms and Conditions of Purchase contain a number of specific provisions surrounding our expectations of suppliers in the context of the prevention of slavery and human trafficking. Specifically, suppliers are under an obligation:

- (i) not to engage in practices that amount to slavery, servitude, forced labour or human trafficking.
- (ii) to comply with applicable slavery laws; and
- (iii) to provide information to enable Greencore to include meaningful information in its Slavery and Human Trafficking Transparency Statement.

We require all new raw material suppliers to be connected to Greencore on SEDEX and we continue to bring existing suppliers into the scheme; progressively building SEDEX membership across our supply base.



## Risk Management

Ethical compliance is listed on the Greencore risk register. Greencore sites undergo an annual independent audit by the Group Risk Management function, as detailed within our Key Performance Indicators ('KPIs') as set out on page 14. This includes documentation checks on a sample of the workforce and review of the systems in place for management of working time compliance.

Compliance with the relevant legislation and guidance is reviewed by the Technical, Company Secretariat & Legal and HR functions and is reported to the Audit and Risk Committee Board. During FY20, our ability to conduct site inspections was restricted as a result of the COVID-19 controls required to safeguard our colleagues. This has been reflected within the reported KPIs but is regarded as an exception rather than a precedent.

We highlight agency labour as a part of our business operation which may have a risk of slavery and human trafficking occurring and therefore risk audits of agency labour providers are carried out by our Technical and local HR teams. We have worked to move agency workers on to direct contracts with Greencore throughout FY20 and our agency labour rate has declined considerably. Although we believe our actions have proven effective to date, there is no room for complacency and therefore we remain vigilant to potential risks.



# 5. Training & Capacity Building

To be effective at preventing and tackling modern slavery, we need to raise awareness of this important issue and the associated risks, and also to improve our knowledge.

Although the COVID-19 crisis during FY20 reduced our ability to visit sites at times, training remains a key part of the our approach.

Greencore supports the Stronger Together campaign and each manufacturing site is expected to maintain the Stronger Together Business Partner commitment. Colleagues from each site receive training in relation to this initiative in addition to training in a number of areas related to ethical standards within our operations.

HR teams in Greencore are provided with the knowledge and resources

required to conduct checks on "Right to Work" compliance. HR colleagues also maintain competency in management of the SEDEX system, booking ethical audits and closing out non-conformances.

Training on hidden labour exploitation is included in our induction sessions, and a training package on ethical standards is provided to colleagues as part of our line manager framework platform.





# 6. Collaboration

Greencore is a member of the Food Network for Ethical Trade ('FNET').

FNET is an initiative aiming to use the collective leverage of suppliers and retailers to bring about positive change in global food supply chains working conditions by providing guidance, resources, training and opportunities for collaboration. Greencore's Head of Human Rights is the current Chair of the Board of FNET.

During FY20, we presented at a number of human rights webinars with collaborative partners to discuss the challenges associated with COVID-19 from a human rights perspective. We also played an instrumental role in the creation of [www.foodfarmhelp.com](http://www.foodfarmhelp.com), which is an online resource to help suppliers access the latest data and build an ethical response to COVID-19. Greencore continues to work with other businesses and stakeholders through the SEDEX Stakeholder

Forum ('SSF') and maintains links with the Gangmasters and Labour Abuse Authority ('GLAA'); the Association of Labour Providers ('ALP'); Hope for Justice; and Stronger Together. In addition, Greencore is helping to build a new pilot approach to sharing modern slavery intelligence among a group of retailers and suppliers.

We continue to support and work with the Bright Future Scheme and the Bright Futures programme in order to support survivors of modern slavery, including introducing them back into the workforce. We are proud of the initiatives we have taken to date and we will continue to be innovative in our approach to tackle the issue of modern slavery as well as assisting survivors of modern slavery.



# 7. Tracking our progress

Transparency is central to our approach in tackling labour exploitation, modern slavery and human trafficking. We want to share areas of progress as well as challenges. This applies to both our own activities as an employer and food manufacturer and to the activities of our suppliers.

Our plans for progress in FY20 were impacted by the COVID-19 pandemic. To ensure that we continued to keep our people safe, we were unable to carry out some of the activities that we had been expecting to, such as site audits and inspections. We chose to focus our resources on collaborative projects, as described in section 6, alongside detailed supply chain risk analysis and transparency. This is reflected in the KPI data on the following page.

We track progress through a number of metrics and believe that they help demonstrate the effectiveness of our plans to ensure that slavery and human trafficking is not taking place in our business. The objectives measured against each KPI are set out opposite.

## Commitments

Within our FY19 Modern Slavery and Human Trafficking Transparency Statement, we outlined a number of commitments for FY20, each of which we have met and which remain in place for FY21.



We will report on our actions – our successes and failures – in a simple and transparent way each year.



Greencore will strengthen our internal skills and competencies by recruiting strongly and integrating ethical trade experts into our sustainability team.



Our successful cross-disciplinary approach, that engages colleagues in Technical, HR, Operations and Purchasing functions will be further supported and developed.



We will increase focus on supply chains, understanding the realities of complex multi-tier and multi-national supply from an ethical perspective.



We will build partnerships with external experts, academia and non-governmental organisations to inform our ethical practices and help address modern slavery, human trafficking, abuse and exploitation.



We will continue to support the survivors of modern slavery and human trafficking.



## Plans for FY21 and beyond

We are developing a new Responsible Sourcing Code of Conduct for our suppliers and updating our Human Rights Policy which will launch in FY21. A detailed risk analysis will be undertaken for our most important ingredients, so we can target key supply chain risks and develop action plans in partnership with our suppliers. As set out on page 8, we are focusing on ten priority ingredients that carry the greatest sourcing risks from three areas – forest, fisheries, and field.

By 2025, we will ensure 100% of our suppliers meet our new Responsible Sourcing Code of Conduct. We will draw up a 'risk register' for our global supply chains and sourcing operations, and work with our suppliers to tackle identified risks.

## Key Performance Indicators

Throughout this statement, we reference KPIs as our way of demonstrating transparency and the drive for improvement. We continue to report the same KPIs as in previous years as we believe that they remain the most appropriate measures.

Area	Objective	Target end Sept 2020	Achieved end Sept 2020	Commentary
<b>Independent Ethical Audit</b>	All sites have an up to date ethical audit	100%	● 63%	During FY20, the COVID-19 controls that we put in place across our business necessarily impacted our ability to carry out audits, inspections or some parts of our planned activity.  We have been transparent regarding those areas that were negatively impacted by the COVID-19 crisis during FY20.
	All sites have closed out any non-conformances from ethical audits within agreed timescales	95%	● 69%	
<b>Stronger Together</b>	All sites are Stronger Together Business partners	100%	● 75%	
<b>Supplier SEDEX Registration</b>	Raw material and packaging suppliers are SEDEX registered	95%	● 99%	
<b>Group Risk Audit</b>	Audit of all sites completed by Group Risk Management function	100%	● 60%	
<b>Training</b>	Each site to train managers in the Greencore Ethical Code & Employment Standards Policy	90%	● 55%	



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