



Greencore

Modern Slavery and Human Trafficking Transparency Statement

Making every day taste

better

For the financial year ended 24 September 2021

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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 24 September 2021 ('FY21').

In FY21, we continued to develop our sustainability strategy, building upon the materiality assessment conducted in FY20. Risks surrounding human rights and modern slavery remain as important material sustainability issues, demonstrating the ongoing importance of this 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 FY21 applies are:

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

Other Greencore companies not based in the UK (Trilby Trading Ltd) are referenced in this statement, but are not regarded as being in scope for reporting in FY21.

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:



Patrick Coveney
Group Chief Executive Officer

Date of approval:
25th January 2022



Guy Dullage
Group Chief People Officer
and Director of:

Greencore Food to Go Limited
Greencore Grocery Limited
Greencore Prepared Meals Limited
Freshtime UK Limited
Date of approval:
7th February 2022



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 13,000 colleagues across our operations, which consist of 21 production units at 16 locations, five regional distribution centres and 13 transport hubs.

During the reporting year of FY21, 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 latest Annual Report and Financial Statements which can be accessed at 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 our priority ingredients 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 products are made from ingredients sourced from more than 350 suppliers around the world. 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.

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.

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 continue to utilise the role of a Non-Executive Director as our 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 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 seven 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, sustainable diets and climate risk.

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, which is informed by the International Labour Organisation ('ILO') Declaration on Fundamental Principles and Rights at Work. Greencore is aligned to the principles of the Ethical Trading Initiative (ETI) Base Code. These are:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

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 and Managing 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 FY21, 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 will 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.

Our risk assessment of our palm oil supply chains to date has focussed upon directly sourced ingredients; in addition to ingredients that form part of our products, we also own an oils trading business, Trilby Trading Limited, who were not included in our risk assessment review for FY21, but will be included within our FY22 programme.



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 multilingual 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.



Action in high risk supply chains:

During FY21 Greencore have been actively involved in the mitigation of risks in our supply chains, identified by our risk assessment process or other means. This work has included:

- Exit from Xinjiang supply of food products due to the risks of forced labour in the region. This was a significant cross-functional project that changed the sourcing practices a range of items, including our largest (by volume) raw material in order to address human rights concerns.
- Work with poultry suppliers in the UK identified as high risk to improve worker standards
- Work with baked goods supplier in the UK to build capacity and improve the experience for their workers

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 below. 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 FY21, our ability to conduct site inspections continued to be 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 continued to move agency workers on to direct contracts with Greencore throughout FY21. Although we believe our actions have proven effective to date, there is no room for complacency and therefore we remain vigilant to potential risks.

Due to the labour challenges brought about by the UK's exit from the EU and the resulting reduced freedom of movement, labour availability throughout FY21 has been increasingly challenging. This has been compounded by the challenges brought about by the COVID-19 pandemic. We have engaged with more labour providers than has historically been the case. The approval process for these new providers is multi staged and includes a comprehensive background check by our Human Rights team and a detailed audit by our Technical Supplier Approval team which contains specific requirements around the prevention of modern slavery or other labour exploitation. Several prospective labour providers have been rejected as a result of the background check finding them inappropriate partners, and further prospective providers have been either rejected, or approved with additional conditions applied, as a result of the technical audit.



5. Training and 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 FY21 again impacted on our ability to visit sites at times, training remains a key part of 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 was Chair of the Board of FNET until September 2021 and remains a member of the Board.

During FY21, we continued to support www.foodfarmhelp.com, which is an online resource to help suppliers access the latest data and build an ethical response to COVID-19. This project was initiated in FY20, and engagement continued during the current reporting year.

Greencore continues to work with other businesses and stakeholders and maintains links with the Gangmasters and Labour Abuse Authority ('GLAA'); the Association of Labour Providers ('ALP'); Hope for Justice; and Stronger Together.

Modern Slavery Intelligence Network

The Modern Slavery Intelligence Network (MSIN) is a pioneering non-profit collaboration in the UK food and agriculture sector created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation.

Coming together in 2020, 14 member companies (including retailers, manufacturers and processors) are engaged in an 18-month pilot to develop an innovative and proactive intelligence-sharing mechanism to enhance their effectiveness in disrupting modern slavery and labour exploitation within the UK. Information generated by the network will be used to detect, prevent and disrupt modern slavery and labour exploitation activity in their industry sector, protecting workers and improving outcomes for those directly impacted. The project also benefits from the strong personal support of the Independent Anti-Slavery Commissioner, Dame Sara Thornton, who continues to highlight and champion the work of the MSIN.

Throughout 2021, members have met regularly and engaged with external stakeholders, including but not limited to law enforcement agencies, to share plans and seek guidance on the approach the MSIN should take in order to achieve successful outcomes. The MSIN is working together to achieve effective ways of working and to ensure, so far as possible, that robust mechanisms are in place to safeguard those who may be impacted by modern slavery and/or worker exploitation and their data. This has required a significant commitment from all members involved and engagement with several internal functions within the members' organisations including human rights, ethical trading, legal, data protection, privacy and IT security.

The MSIN has selected the NGO and independent international charity, Stop the Traffik, to provide a secure platform for information and intelligence sharing, along with expert analysis and guidance on modern slavery prevention and remediation. It is intended that members will share details of incidents or suspected incidents of modern slavery or worker exploitation through the online platform with Stop the Traffik, who will then analyse and enrich

the data using dedicated tools and resources. This enables the MSIN to build a robust evidence base that can be shared with members and, where appropriate, will give the MSIN a body of information and/or intelligence that can, in appropriate circumstances, be shared with law enforcement.

Live intelligence sharing is due to start in early 2022. Following the success of the pilot, the MSIN aims to be in a position to launch formally in June 2022 and to report publicly on the findings from its pilot.

Greencore have deployed significant resources and skills to support the initiative throughout FY21 and will continue to do so through the duration of MSIN. We see such collaborative programmes as the main avenue available to us to actively disrupt Modern Slavery and exploitation.

Bright Future

We continue to support and work with the Bright Future Scheme and the Bright Future 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. During FY21 we have demonstrated our ongoing commitment to the programme by becoming a member, which will help us to support the growth of the programme.

Ingredients 4 Life

To further our commitment to supporting survivors of Modern Slavery we have been working alongside charity organisations City Hearts and The Snowdrop Project and a retail partner to develop a unique initiative to help

survivors of modern slavery to gain confidence in the culinary skills and to also help them to regain their trust in people.

During 2021 the Greencore chefs hosted a series of three online cookery lessons for a group of City Hearts clients, people who have experienced and survived modern slavery under the banner of Ingredients 4 Life. With the support of The Snowdrop Project this model has been adapted into a digital setting in order to meet COVID restrictions and to make the project more accessible for the clients, whose identities are fully protected.

In addition to developing culinary skills the Ingredients 4 Life initiative also provides an opportunity for the Greencore chefs to promote healthy eating, eating on a budget and sustainability. Following this successful pilot, we plan to further roll out the programme in 2022.



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 FY21 continued to be impacted by the COVID-19 pandemic. However, we were able to return to some onsite activity both within our own business and our supply chains. Our third-party ethical audit programme, which had been severely disrupted in FY20 by the pandemic, resumed with the use of both virtual and in-person audits as restrictions allowed, while continuing to keep our people safe during the continuing pandemic.

We continued to focus 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

Our ongoing commitments are below.



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



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 multinational supply from an ethical perspective.



We will play a leading role in collaborative programmes that tackle wider ethical challenges as well as specific Modern Slavery risks.



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 FY22 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 FY22.

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 above, we will continue to focus on priority ingredients that carry the greatest sourcing risks from three areas – forest, fisheries, and field.

In addition to our risk assessment of key ingredients, we will also conduct a human rights review of our subsidiary business, Trilby Trading Ltd.

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
Independent Ethical Audit	All sites have an up to date ethical audit	100%	63% <i>[Note: due to scheduling this rose to 94% by Dec 21]</i>	During FY21 the Covid-19 controls in place across our business necessarily impacted our ability to carry out audits, inspections or some parts of our planned activity
	All sites have closed out any non-conformances from ethical audits within agreed timescales	95%	81%	
Stronger Together	All sites are Stronger Together Business Partners	100%	63%	
Supplier SEDEX Registration	Raw material and packaging Suppliers are SEDEX registered	95%	97%	
Group Risk Audit	Audit of all sites completed by Group Risk Management function	100%	94%	
Training	Each site to train managers in the Greencore Ethical Code & Employment Standards Policy	90%	88%	

Greencore 

www.greencore.com

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Making every day taste *better*