



**Greencore**

# Modern Slavery and Human Trafficking Transparency Statement

**Making every day taste**

*better*

For the financial year ended 30 September 2022

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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 committed to respecting and safeguarding the people who work for us, with us, or who are affected by our activities. We are committed to playing our part in addressing modern slavery and we firmly advocate for transparency and collaboration to eliminate this kind of activity.

In last year's Modern Slavery and Human Trafficking Transparency Statement, we committed to playing our part in tackling modern slavery. We have met this commitment and continue to focus on human rights and the struggle against modern slavery and labour exploitation. We are determined to be transparent about the challenges that we face and know that we can only disrupt these abhorrent crimes by working in partnership with other organisations in the food industry and our stakeholders, colleagues and suppliers.

Greencore Group Plc and each of its subsidiaries is committed to respecting and safeguarding the people who work for us, with us, or are affected by our activities. We choose to act as advocates for change in the hope that the crime of modern slavery can be eliminated wherever it is encountered.

Greencore falls within the reporting scope of the UK Modern Slavery Act 2015 ('The Act') and this statement for our financial year 2022 (ending 30th September 2022) describes the actions we have taken to ensure that modern

slavery is not taking place in our operations and supply chains.

This statement is made in accordance with Section 54, Part 6 of the Act. It details each Greencore entity to which Section 54, Part 6, applies 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 FY22 applies are:

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

Although the Greencore subsidiary, Trilby Trading Ltd, is based in the Republic of Ireland and the Act does not therefore apply, Greencore has chosen to increase its transparency of our reporting to include Trilby Trading. We have therefore provided a detailed description of the steps taken to address modern slavery within their business model.

This statement, which will continue to be 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:



**Dalton Philips**  
Group Chief Executive Officer



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

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

Date of approval: 31 January 2023





# 2. Our Business

## 2.1 What we do

We are a leading manufacturer of convenience foods 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 are proud to supply a wide 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 14,000 colleagues across our operations, which consist of 23 production units at 16 locations, five regional distribution centres and 13 transport hubs.

We work in alignment with our corporate purpose 'Making every day taste better' and our sustainability ambition 'Better Future Plan', which 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](http://www.greencore.com).

## 2.2 Our purpose

Our purpose, 'Making every day taste better' defines and inspires us. People are the single most important element of our organisation. 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 work to combat modern slavery and human trafficking is a key way that we choose to protect our people, both colleagues within Greencore and those who work in our supply chains. In turn, this work is part of our wider corporate purpose and features as a key component of our sustainability strategy.

Our corporate purpose provides a broad framework for this and together with our sustainability strategy, which includes human rights, it gives a clear direction for the business. For us, purpose, people and sustainability are interconnected.

## 2.3 Our supply chain

We have publicly stated our aspiration to source our priority ingredients from a sustainable and fair supply chain by 2030. We know that this will require improvements in transparency throughout our global supply chains and we acknowledge the potential for modern slavery and human trafficking within these supply chains. We use a range of approaches and tools to address these risks and describe them in this report.

Greencore is a food manufacturing business. The food that we make and sell is made using ingredients sourced from approximately three hundred suppliers around the world although the majority of these suppliers are UK-based businesses. We work to build effective, fair and transparent supply chains and often have long-term relationships with suppliers that help us achieve this.



# 3. Our Policies and Governance

## 3.1 Policies

Greencore are committed to honesty and integrity in the conduct of our business. The **Greencore Code of Ethics and Business Conduct** defines and describes the principles we rely on to carry out our activities, and is publicly available at [www.greencore.com](http://www.greencore.com).

We are transparent about the standards that we work to and publish our ethical commitments in the **Greencore Ethical Code & Employment Standards Policy**, which is also at [www.greencore.com](http://www.greencore.com).

Greencore acknowledge that the ways in which we conduct business and manage our company affairs has the potential to impact our stakeholders directly and they have the right to expect high standards throughout.

We have maintained our commitment as a Group to implement the principles of the Ethical Trading Initiative Base Code, an internationally recognised code of labour practice.

## 3.2 Governance

During FY22, we have continued to evolve our governance model to ensure that it is fit for purpose. We have developed a clear governance process for handling modern slavery and human trafficking challenges, both within our operations and our supply chains.

Greencore's corporate purpose and sustainability strategy are set by the Board. Our Board monitors our overall sustainability performance, which includes modern slavery and human trafficking, against our stated ambitions and targets.

The Sustainability Steering Committee has overall responsibility for the delivery of our sustainability strategy, and feeds into the bi-monthly Board update provided by the Head of Sustainability.

Reporting into 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 responsible sourcing and human rights, ethics, energy and environment, packaging, communities, and healthy and sustainable diets. These steering groups are chaired by senior leaders.

In addition, the Board oversees our Better Future Plan which is one of our core strategic business priorities. A sustainability update is provided at each scheduled bi-monthly Board meeting by the Head of Sustainability, along with progress towards targets and key performance indicators.

How we govern our Better Future Plan is fundamental to its success, ensuring alignment, support, ownership and progress tracking. Every year, we look to continuously improve our approach in line with the maturing of our strategy within the business. We revisit our governance structure on an annual basis, making sure we have the right forums at the appropriate frequency. Having the right voices around the table is vital for continuous improvement and ensuring our approach remains relevant.



### 3.3 Employment standards

The Greencore Ethical Code & Employment Standards Policy, available at [www.greencore.com](http://www.greencore.com), is informed by the International Labour Organisation ('ILO') Declaration on Fundamental Principles and Rights at Work. Greencore is also aligned to the principles of the Ethical Trading Initiative (ETI) Base Code:

- 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

In order to support these standards, Greencore is an AB (Buyer/Supplier) member of the Supplier Ethical Data Exchange ('SEDEX'). Each manufacturing facility is registered with SEDEX and has completed a self-assessment questionnaire. All manufacturing sites have regular independent ethical audits conducted by an external accredited audit company.

Our employment standards are equally applied to employment agencies with which we contract to supply temporary workers. These agencies must demonstrate a commitment to, and compliance with, the Greencore Ethical Code & Employment Standards Policy. For example, 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 personal contractual documents. We work closely with the agencies to share best practice for worker welfare and approaches for addressing modern slavery or labour exploitation risks. In addition, we audit and monitor their compliance on an ongoing basis.





# 4. Assessing and Managing Risk

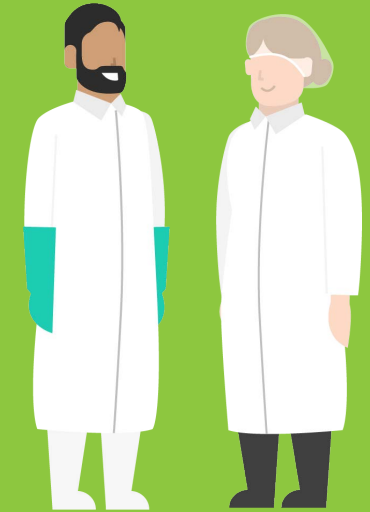
## 4.1 Risk assessment processes

During FY22, we have continued to apply the risk assessment approach to our supply chains that we have built over a number of years with our suppliers, customers and stakeholders. Our supply chains are complex, large, and international and we are mindful that there may be the risk of modern slavery or human trafficking within supply chains.

We completed a risk assessment of our ingredient supply chain using the current

iteration of the Food Network for Ethical Trade Human Rights Risk Assessment Tool. The 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.

We also use data from SEDEX and individual suppliers to ensure the most accurate picture of the risk profile is presented. 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 broad assessment process identifies ten areas for priority focus from a human rights perspective:

- Fresh produce
- Chicken
- Processed tomatoes
- Tuna
- Herbs and spices
- Frozen produce
- Warm-water prawns
- Soya
- Palm oil
- Rice

These category priority areas are then informed by detailed product-by-product risk scores which steer the engagement decisions that we make

with our suppliers and help us select the facilities and companies which require the most active support. Internal data reports and KPIs that describe these outputs are presented to our Responsible Sourcing and Human Rights Committee to ensure senior management review and engagement.

### Trilby Trading Ltd

Within our Modern Slavery and Human Trafficking Statement for FY21, we described our intention to expand the scope of our due diligence activities to include our Irish-based edible oils trading business, Trilby Trading Ltd. This work was launched during FY22 and we have been able to map and identify

human rights risks within the Trilby Trading supply chain model. The highest risks are seen within the traded palm oil products – these are sourced through a vertically-defined supply chain with a single commodity supplier who in turn both operates palm oil refineries and plantations as well as purchasing from the wider palm oil sector. There is much data in the public domain describing serious human rights challenges at palm oil plantations in Indonesia and Malaysia, ranging from investigative journalism to USA Customs and Border Protection Withhold Release Orders. As is common in this commodity sector, both of these countries are

included in our palm oil supply chains.

We will work with our suppliers to understand how best to address these worker welfare challenges during FY23. The data currently show that 10% of the palm oil that Trilby sells is covered by a standard that has some element of enhanced worker welfare insight and control (RSPO). However, we will be meeting with our suppliers and working closely with them throughout FY23 to critically evaluate the approach that they are taking to improve not just transparency but also taking positive actions in this area.

## 4.3 Managing and mitigating risk

### External reporting: “Whistleblowing”

Greencore continues to provide 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 concerns are appropriately investigated, actioned and reported upon to the Audit and Risk Committee of the Board on a regular basis.

### Stronger Together

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 many Greencore teams and 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

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.

During FY23, we will launch two new cornerstone documents to support our supplier management processes – a Supplier Code of Conduct and a Human Rights Policy. In addition, 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 FY22, 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:

- Continued embargo of products sourced from Xinjiang, due to the risks of forced labour in the region
- Ongoing work with poultry suppliers in the UK identified as high risk, to improve worker standards
- Work with fresh produce suppliers in the UK to address labour practices, labour agency compliance and worker welfare, with a focus on field harvesting
- Building a model for increased engagement with our poultry supply chains from Thailand, including visits and membership of Issara Institute, an independent NGO based in Southeast Asia tackling issues of human trafficking and forced labour through worker voice, partnership, and innovation
- Addressing and resolving potential child labour issues in the UK commodity food manufacturing / food service sector

As in previous Statements, we highlight agency labour as a part of our business operation which may have a risk of slavery and human trafficking occurring. We therefore prioritise audits of agency labour providers, carried out by our Technical and local HR teams, and conducted on a rolling basis through the year. We also continue to conduct deep-dive human rights due diligence on potential new agency labour providers prior to entering into any contractual relationships. This model has proven effective to date, but we are very aware that those who seek to profit from labour exploitation regularly revise their models of infiltration and criminal activity and that there is absolutely no room for complacency.

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. As in FY21, some prospective labour providers have been rejected as a result of the checks, or approved with additional conditions applied.



## 5. Training and Capacity Building

Greencore supports the Stronger Together campaign and each manufacturing site is expected to maintain the Stronger Together Business Partner commitment. Colleagues from our sites 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, managing and leading 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 remained a member of the Board during FY22.

Greencore continues to work with other businesses and stakeholders and maintains links with the Gangmasters and Labour Abuse Authority ('GLAA'), relevant Police teams, 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. The MSIN is fundamentally a platform for sharing modern slavery data safely and appropriately with wide-ranging stakeholders.

The MSIN members are working together 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.

Greencore have deployed significant resources and skills to support the

initiative throughout FY21 and FY22. We see such collaborative programmes as the main avenue available to us to actively disrupt Modern Slavery and worker 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.

## Ingredients 4 Life

During the year, we worked 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 learn new culinary skills and to also help them to regain their trust in people. We were able to return to the Greencore kitchens in person following the move to virtual support during COVID.

In addition to developing food skills and

knowledge, the Ingredients 4 Life initiative also provides an opportunity for the Greencore chefs to promote healthy eating, eating on a budget and sustainability. We have received heart-warming feedback from the participants, both Greencore colleagues and survivors of modern slavery and remain committed to supporting the programme.





# 7. Tracking Our Progress

We cannot tackle labour exploitation, modern slavery and human trafficking without being transparent about the challenges that we encounter. We also want to share areas of progress and improvement. This applies to both our own activities as an employer and food manufacturer and to the activities of our suppliers.

In FY22, we continued to focus on collaborative projects, as described in section 6, alongside detailed supply chain risk analysis and transparency. We track progress through a number of metrics and believe that they help demonstrate the effectiveness of our actions to ensure that slavery and human trafficking is not taking place in our business. The objectives measured against each KPI are set out on the page below.

## 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, worker abuse and exploitation.



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

## Plans for FY23 and beyond

- 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 our attention on priority ingredients that carry the greatest sourcing risks.
- We will increase the human rights support that we provide to the transport, logistics and warehousing components of our business model, with the intention of introducing a Sedex Members Ethical Trade Audit (SMETA) pilot project within our largest logistics facility.



## Key Performance Indicators

Throughout this statement, we reference KPIs as our way of demonstrating transparency and the drive for improvement. We believe that these KPIs are the most appropriate measures of our activity.

Area	Objective	Target end Sept 2022	Achieved end Sept 2022	Commentary
<b>Independent Ethical Audit</b>	All sites have an up to date ethical audit	100%	94% <i>[Note: due to scheduling this rose to 100% by Nov 22]</i>	We were able to return to in-person due diligence activity during FY22.
	All sites have closed out any non-conformances from ethical audits within agreed timescales	100%	100%	
<b>Stronger Together</b>	All sites are Stronger Together Business Partners	100%	69%	The programme resets every January. Not all sites completed the programme during the reporting period. New HR Business Partners have been enrolled for appropriate training after the reporting period.
<b>Supplier SEDEX Registration</b>	Raw material and packaging suppliers are SEDEX registered	95%	99%	Registration is part of the new supplier on-boarding process.



[www.greencore.com](http://www.greencore.com)

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**Making every day taste** *better*