

Modern Slavery and Human Trafficking Transparency Statement and Annual Report on Progress

For the Financial Year ended 27 September 2019



Contents

1. Scope	3
1.1 Our Statement	3
2. Our Business and Supply Chain	4
2.1 What we do	4
2.2 People at the Core	4
2.3 About Greencore's Supply Chain	4
2.4 Commercial and Operating Model	5
3. Our Approach to Managing Ethical Risk	6
3.1 Our Ethical Policies	6
3.2 Employment Standards	6
3.3 Monitoring and Auditing	7
3.4 Training & Capacity Building	9
3.5 Collaboration	9
4. How We Measure & Monitor Progress	10
Key Performance Indicators	10
5. Our Action Plan	11



1. Scope

Greencore is fully committed to playing our part in eradicating modern slavery. We firmly advocate for transparency and collaboration to eliminate modern slavery.

Our approach to worker welfare is embodied in 'The Greencore Way'. The Greencore Way puts our people at the core of everything that we do, from our manufacturing operations, to our latest recipes and products and our relationships with customers. We believe that we ultimately differentiate ourselves through our people.

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 refers to the financial year ending 27th September 2019 ('FY19'). It sets out the steps taken by the Greencore Group ('Greencore' or the 'Group') to prevent modern slavery and human trafficking in our own operations and supply chains.

1.1 Our Statement

This statement is made in accordance with Section 54, Part 6 of the Modern Slavery 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 FY19 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 Section 54, Part 6 of the Modern Slavery Act 2015.

Signed:



Eoin Tonge
Chief Financial Officer, Greencore Group plc

and Director of:

Greencore Food to Go Limited

Greencore Grocery Limited

Greencore Prepared Meals Limited

Freshtime UK Limited*

*Freshtime UK Limited was acquired by the Greencore Group on 3 September 2019

2. Our Business and Supply Chain

2.1 What we do

Greencore is a leading manufacturer of convenience food in the UK. We supply grocery and other retailers, including all of the major UK supermarkets. The Group has strong market positions in a range of categories including sandwiches, food to go salads, sushi, chilled snacking, chilled ready meals, chilled soups and sauces, chilled quiche, ambient sauces and pickles, and frozen Yorkshire Puddings.

Each year we manufacture around 717 million sandwiches and other food to go products, 123 million chilled prepared meals, and 231 million bottles of cooking sauces, pickles and condiments. The Group carries out around 7,500 deliveries to stores each day.

Greencore has 21 production units in 16 world-class manufacturing sites in the UK, with industry-leading technology and supply chain capabilities. The Group also operates two ingredients trading businesses in Ireland. The Group employs c.11,500 people and is headquartered in Dublin, Ireland.

2.2 People at the Core

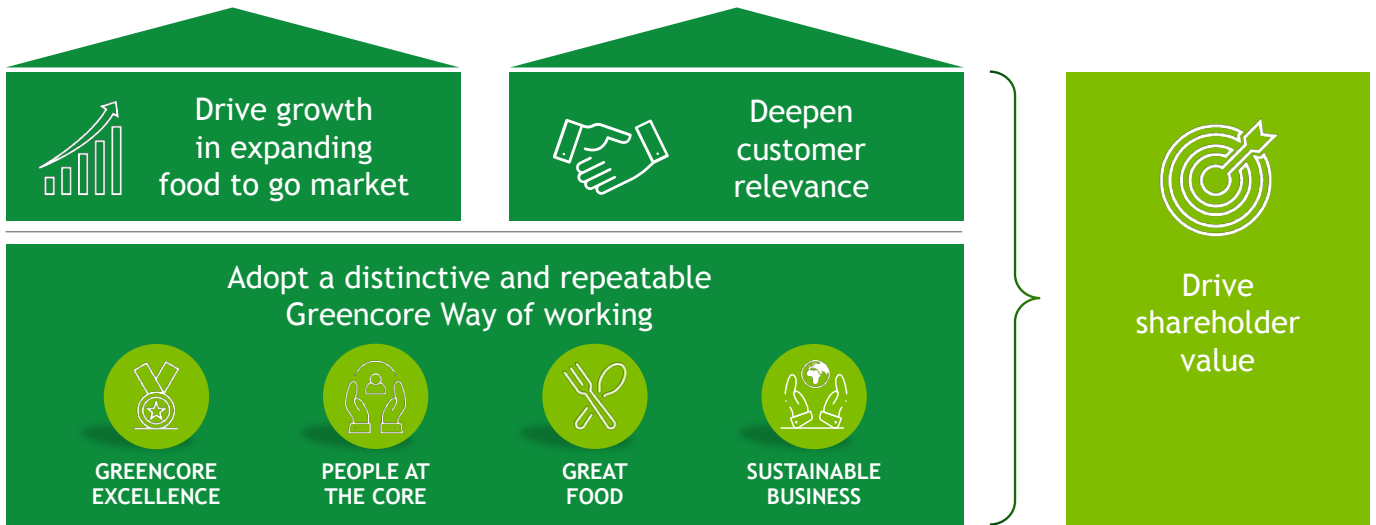
With approximately 11,500 talented, committed and experienced people across our UK and Irish operations, our people are central to everything we do. The Greencore Way has the central principle of "People at the Core" - it is within this framework that we acknowledge that it is our responsibility to treat our employees, contractors, suppliers, customers and all of our stakeholders with dignity and respect.

2.3 About Greencore's Supply Chain

Annually, the business purchases approximately 9,000 different ingredient and packaging materials from c.500 suppliers from both UK and global sources, along with having over 2,000 suppliers of non-resale goods and services.

2.4 Strategy and Operating Model

During FY19, we refocused our portfolio and strategy and we now have a clear set of strategic objectives. These are to drive growth in an expanding food to go market, to deepen customer relevance, and to adopt a distinctive and repeatable Greencore Way of working. These are underpinned by an economic model of disciplined growth and investment, creating value for all stakeholders.



WHAT DIFFERENTIATES US

GREENCORE EXCELLENCE

- Distinctive and repeatable way of working
- Step-change in our purchasing, manufacturing and commercial capabilities

PEOPLE AT THE CORE

- Effective workforce management
- Distinctive leadership team

GREAT FOOD

- Industry leadership in food integrity
- Innovation commitment to deliver customers' taste, nutrition and cost goals

SUSTAINABLE BUSINESS

- Commitments on how we run our business
- Contributions to industry sustainability

3. Our Approach to Managing Ethical Risk

3.1 Our Ethical Policies

We believe in transparency and have set out our ethical policy and commitments in the Greencore Ethical Code & Employment Standards Policy, which is publicly available at www.greencore.com

We are committed to ensuring a high standard of ethical and business practices and believe that we have a responsibility to adhere to the highest standards of behaviour and care. 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
- Implementing the principles of the Ethical Trading Initiative Base Code.

3.2 Employment Standards

Our employment standards are defined in the Greencore Ethical Code & Employment Standards, available at 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 are practised.

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. 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. They must also comply with the rules and guidance of the UK Border Agency.

3.3 Monitoring and Auditing

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.

1. Stronger Together

Greencore supports the “Stronger Together” campaign, which is a multi-stakeholder initiative aimed at reducing modern slavery. We believe that collaboration and transparency are vital to address the challenge of modern slavery. As per our key performance indicators (‘KPIs’) (see page 10), all Greencore sites are Stronger Together business partners and are committed to putting measures in place to help prevent and tackle hidden labour exploitation.

We are committed to building knowledge within our teams and members of the Group Technical, Group Purchasing and Human Resources 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 the Greencore sites.

2. Supplier Management

We have complex and multi-national 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 will 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 Group Purchasing and Technical functions. This 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.

Understanding the ethical trade risks within our numerous products is informed by detailed risk assessments. We carry out ethical assessments of our raw material sources to identify those areas most at risk of modern slavery and human rights abuses. This enables us to target these areas through supplier engagement.

During the risk assessment process we consider the material category and geographical risks. A raw material is categorised as high risk if human rights abuses have previously been associated with the same category of products. Indicators used to determine geographical risk include the ILO's statistics on forced labour and trafficking and the 'Walk Free Foundation Global Slavery Index'.

This process has enabled Greencore to identify those supply chains that are a priority, allowing us to reduce the risk of slavery and forced labour. In the first instance, Greencore ensures that our suppliers within these priority categories are SEDEX registered. This forms one of the KPIs through which we measure our progress.

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

During FY18 we reported on our extension to the requirement for SEDEX registration to certain categories of suppliers providing non-food products and services to each Greencore site. This programme continued throughout FY19.

During FY19 we improved our systems. Risk assessments have been implemented for suppliers within the raw material categories identified through the horizon scanning process. This is based on the SEDEX Self-Assessment Questionnaire together with business specific metrics.

As part of an overall risk reduction strategy, Greencore has reduced complexity within the supply base. We have shortened and integrated supply chains where possible, for example, this has included plans to move to a single manufacturing agency labour provider in the UK, consistent with reduction of risk of modern slavery and forced labour.

We have developed a more sophisticated approach to risk assessment during FY19 and adopted the process advocated by Stronger Together (based on the United Nations' Guiding Principles on Business and Human Rights). We continue to engage with higher risk suppliers to understand their ethical practices. As part of this work, we are using tools developed by the Food Network for Ethical Trade ('FNET'), and have been active in the ongoing development of these specific tools within FNET Workstream 1 – Risk Assessment.

FNET is a collaborative food industry initiative that aims to improve human rights in global food supply chains through a common approach to ethical trade. It brings together food processors, manufacturers, brands and retailers. Greencore is a member of the initiative and is active in a number of detailed workstreams, with one of our colleagues serving as the current Chair of the Board of FNET.

3. Risk Management

Ethical compliance is listed on the Greencore risk register. Greencore sites undergo an annual independent audit by the Group Risk Management function. 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 Group Technical, Group Company Secretariat & Legal and Group Human Resources and is reported to the Greencore Group plc Audit Committee.

Risk audits of agency labour providers are carried out by our Group Technical and local Human Resources teams. These form part of our KPIs.

3.4 Training & Capacity Building

To be effective at preventing and tackling modern slavery, Greencore needs to raise awareness of this important issue and the associated risks, and also to improve our knowledge. Training forms a key part of the Greencore approach.

As set out above, Greencore supports the 'Stronger Together' campaign and each Greencore Stronger Together Business Partner regularly receives training in relation to this initiative in addition to training in a number of areas related to ethical standards within our operations.

HR departments in Greencore are trained in the skills required to conduct checks on right to work compliance. All Greencore HR teams 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 Greencore induction sessions. A training package on ethical standards has been developed and is being rolled out to managers and supervisors across sites. As part of this training resource, in collaboration with specialist officers from Northumbria Police's safeguarding department, we have compiled a video for colleagues detailing how to identify labour exploitation and modern slavery.

In addition, a number of colleagues have attended externally facilitated courses to learn how to recognise the signs of possible hidden labour exploitation.

3.5 Collaboration

We recognise that acting in collaboration with other food businesses will have more impact than tackling issues alone. In addition to our membership of FNET, 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. We also attend regional initiatives such as the Manchester Modern Slavery Network and the Spanish Ethical Trade Forum.

Greencore is signed up to support the Bright Future Scheme and the Bright Futures programme has commenced at a number of sites. We continue to work with this scheme to support survivors of modern slavery and are proud of the work undertaken by colleagues in this area. We are determined to find ways to support survivors and will continue to work with others to do so.

4. How We Measure & Monitor 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.

Key Performance Indicators

Throughout this statement, we reference KPIs as our way of demonstrating transparency and the drive for improvement. We track progress against our plans to prevent and tackle modern slavery through a number of metrics. The objectives measured against each KPI are set out below.

Area	Objective	Target end Sept 2019	Achieved end Sept 2019	Target end Sept 2020
Independent Ethical Audit	All sites have an up to date ethical audits	100%	100%	100%
	All sites have closed out any non-conformances from ethical audits within agreed timescales	80%	91%	95%
Stronger Together	All sites are Stronger Together Business partners	100%	100%	100%
Supplier SEDEX Registration	Raw material and packaging suppliers are SEDEX registered	95%	95.3%	95%
Group Risk Audit	Audit of all sites completed by Group Risk	100%	100%	100%
Training	Each site to train employee managers in the Greencore Ethical Code of Practice & Employment Standards*	90%	71%	90%

* This statistic excludes Freshtime (UK) Limited which was acquired on 3 September 2019. Freshtime (UK) Limited will be included in this KPI for FY20.

5. Our Action Plan

1. We will report on our actions – our successes and failures – in a simple and transparent way each year.
2. Greencore will strengthen our internal skills and competencies by recruiting strongly and integrating ethical trade experts into our sustainability team.
3. Our successful cross-disciplinary approach, that engages colleagues in Group Technical, Human Resources, Group Operations and Group Purchasing will be further supported and developed.
4. We will increase focus on supply chains, understanding the realities of complex multi-tier and multi-national supply from an ethical perspective.
5. 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.
6. We will continue to support the survivors of modern slavery and human trafficking.