



MODERN SLAVERY ACT TRANSPARENCY STATEMENT

A.H.WORTH

Introduction

This statement sets out A H Worth & Co Limited and all subsidiary companies' actions to understand all potential modern slavery risks relevant to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st June 2019 to 31st May 2020.

As part of the food industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of A H Worth & Co Limited and its subsidiaries:

- A H Worth and Co Limited is a family owned farming and grower / packer business. There are divisions within the group specialising in fresh potatoes, prepared vegetables and other fresh vegetables. We supply a multitude of customers including major retailers, secondary retailers, discounters, Food Service and Wholesale markets. The delivery format varies widely from a 30 tonne bulk load of potatoes down to 280g prepared vegetable product.
- Our suppliers are mainly based in the UK, are well vetted, audited and visited regularly. Each supplier has to be on the organisations Approved Supplier list and can only gain entry to this list after completion of various questionnaires and documentation which includes a rigorous "Ethical trading Initiative (ETI) "questionnaire.

Countries of operation and supply

The organisation currently operates in, or sources from, the following countries:

- United Kingdom, USA, Senegal, Spain, France, Netherland, Germany, Israel, Greece, Egypt, Morocco

The company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking by receiving information through www.transparency.org which provides a risk analysis for all countries we buy produce from.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Employment of seasonal and casual labour through agencies

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Policies are produced by the HR Department and approved by the Board. They are developed in line with prevailing government legislation and ACAS Codes of Practice.
- **Risk assessments:** All third-party routes for provision of labour are audited on an annual basis.
- **Investigations/due diligence:** the HR Department and Operations are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** the HR Department has attended training courses organised by the StrongerTogether initiative. Managers and Supervisors have received in-house training and this training will continue to be delivered until all relevant staff have received the training.
- The HR department has attended training on The Responsible Recruitment Toolkit (RRT) which aligns ethical labour practices with achievement of commercial goals to benefit both workers and the organisation.
- Posters advertising a confidential whistleblowing hotline number are displayed on all noticeboards in numerous languages.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's Whistleblowing Policy is designed to make it easy for workers to make disclosures, without fear of retaliation. The organisation has a confidential helpline operated by SeeHearSpeakUp.
- **Employee Code of Conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Equal Opportunities Policy and Procedure** The organisation's policy means that that it will not tolerate any unlawful discrimination, harassment or less favourable treatment or victimisation of any employee, job applicant, customer provider of services or member of the public as set down in the Equality Act 2010.
- **Company Social and Ethical Policy** The organisation is committed to operating in a social and ethically responsible way.

- **Ethical Trading Initiative Questionnaire** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to declare that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Serious violations of the organisation's supplier Ethical Trading Initiative will lead to the termination of the business relationship.

- **Recruitment/Agency Worker Agreement** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. The organisation carries out an annual audit of the agencies who supply it with temporary labour and require that they comply with "Stronger together" or "Ethical trading" initiatives. The organisation requires agencies supplying gang labour to be registered with the Gangmaster and Labour Abuse Authority.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and annually reviews its existing suppliers. The organisation's due diligence and reviews include:

- using Sedex where suppliers can be checked for their labour standards, compliance in general; and
- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- ensuring the organisations Ethical Trading Questionnaire is completed and that the supplier complies with the Terms and Conditions of trade;
- creating an annual risk profile for key suppliers;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular "Stronger together" or "Ethical trading" initiatives; Ethical trading initiative (ETI) questionnaire;
- termination of the business relationship if a supplier seriously violates our supplier code of conduct.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation:

- requires appropriate managers and all members of the HR Department to have completed training on modern slavery, and to attend regular refresher training;
- develop a system for supply chain verification which has been in place since 2014, whereby the organisation evaluates potential suppliers before they enter the supply chain; and

- review our existing supply chains on an annual basis.

Training

The organisation requires relevant Directors, Managers and the HR Department within the organisation to complete training on modern slavery.

The organisation requires appropriate managers and HR professionals to sign up to training sessions and refresher courses which will be on-going.

The organisation's modern slavery training covers:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises, providing information on the organisations Intranet and at new starter inductions.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board approval

This statement has been approved by the organisation's Board of Directors, who will review and update it annually.

Director's signature:


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Director's name:

DUNCAN RICHARD WORTH