
Modern Slavery Statement

52 weeks ending 29th April 2022

This Modern Slavery Statement has been created pursuant to Section 54(1) of the Modern Slavery Act 2015. It demonstrates how the Fresca Group Limited and its subsidiaries ('the Fresca Group') are positively engaged in tackling modern slavery and labour exploitation. The health, safety and welfare of our employees is, and has always been, our primary focus and we commit to being proactive in our approach to mitigate risks posed by exploiters.

Our Business

Fresca Group is an investor and parent company for a number of subsidiary and joint venture businesses. We believe in conducting business ethically, which for us entails supporting the welfare of our colleagues, being true to our principles and enhancing our reputation.

We have one mission – to be the first choice produce partner for both our customers and our suppliers guided by ethical and sustainable principles and practices.

This encompasses all we stand for – protecting our people, the environment, our supply chain and our communities.

Fresca Group's motivation for improving ethical standards comes from the very top of the organisation. Our CEO is a champion for human rights and the organisational culture reflects this commitment.

100% Owned



Importer, packer, ripener and marketer of fresh fruit. Based in Evesham, Worcestershire.



Avocado specialist, importer and marketer. Based in Paddock Wood, Kent.



Connecting people, places and products around the world. Direct representation for growers, delivering new sales opportunities.



Fresh produce service solutions, from field to consumer. Based in Paddock Wood, Kent.



Logistics and customs service for fresh produce.



Experts in the growing & supply of speciality vegetables. Innovative, with an ever expanding product portfolio.



Branches in Birmingham, Bristol and Southampton. Broad customer base, including foodservice, caterers, secondary wholesalers, cruise lines and retail chains.



Importer and marketer of fresh fruit. Based in Paddock Wood, Kent.



Marketing and commercial rights management of new table grape varieties.

Joint Ventures



Growing, packing & marketing speciality tomatoes, peppers & cucumbers from a landmark site in Kent.



Packing and marketing the highest quality potatoes and vegetables. Based in Lincolnshire.



Marketing the avocado production of the leading Colombian avocado producer, Cartama, in the UK.

Our Values

<h3>Flexibility</h3> <p>In our way of working, our service and our direction</p>	<h3>Resourcefulness</h3> <p>Finding solutions, even in the toughest of times</p>	<h3>Excellence</h3> <p>In our products, our people, our facilities and our performance</p>
<h3>Sustainability</h3> <p>Working for a greater future, stronger ethics & longer relationships</p>	<h3>Character</h3> <p>A Group with diversity, passion and personality, with people who care</p>	<h3>Ambition</h3> <p>Driving developments for Fresca, for our people and our partners</p>

Our Context

It is apparent that the risk of modern slavery has increased in recent times. This is evidenced by the number of live UK wide police investigations increasing from 1,810 for the year to March 2020, compared with the 4,231 for the year to March 2022. We believe there are a number of contributing factors to the increase in risk of modern slavery.

The End of Free Movement:

30th June 2021 was the deadline for non-UK citizens to apply for settled or pre-settled status. For many this process was complex and, in some instances, required many to go back to their home countries to obtain relevant documents to prove their right to remain. Those who missed the deadline or whom have been refused settled status are possibly at risk of exploitation as they look for employment.

Covid-19

Covid-19 has remained present over the last 12 months and the UK has seen many changes to Covid-19 rules.

At the height of the pandemic, many in-person interactions were put on hold as people were encouraged to stay away from each other.

To avoid the spread of the virus, many audits were stopped or postponed, this meant opportunities to identify red flags were limited, enhancing the environment for exploitation.

Labour Shortages

At the start of the Covid-19 pandemic the industry saw a saturated labour pool as many people were furloughed or made redundant. However, over the last 12 months, the industry has seen a severe labour shortage. This has created an opportunity for exploiters – as their commodity (people) has been in great demand.

Ukraine-Russia Conflict

One thing all victims of modern slavery have in common is vulnerability. The situation that unfolded in February 2022 immediately saw millions of people put into a vulnerable position. The media was quick to report on exploiters who were offering to help vulnerable women and girls at border crossings.

The United Nations also reported concerns of women facing potential risks from male hosts through the Homes for Ukraine visa scheme.

Increased costs

In this reporting period, the Government announced changes to conditions for seasonal workers coming to work in the UK. These included a minimum salary threshold and a minimum hourly rate, somewhat above national minimum wage, which pushed up all wages in the agricultural sector. This, together with increased costs in fertiliser, fuel and other commodities, increased the pressure to cut costs and therefore leaves a convenient gap for potential exploitation.

Heightened Seasonal Worker Risks

The Seasonal Worker Scheme now brings workers into the UK from more than 50 countries. In 2022 we have seen the introduction of some brand-new nationalities, which also brings new risks. The increased spread of locations means it is especially difficult to manage these risks. One of the most significant issues is workers having to pay to get work. In many countries, this is widely accepted and considered normal practice, however to access work in the UK, paying fees during any part of the recruitment process is illegal.

Our Supply Chain

The Fresca Group supply chain is large and complex and involves a range of different languages, cultures, legislative regimes, economic environments and approaches to human rights.

The Fresca Group and its supply chain fall into three of the GLAA's highest risk industries;

1. Agriculture
2. Food processing, packaging and production
3. Warehouse and distribution

Fresca recognises that modern slavery and labour exploitation exists, and although we can help to educate and influence our supply chain to reduce risks, it may still occur. We are committed to doing all we can to manage and minimise such risks.

Both the visibility and influence over our multi-tiered suppliers varies. As a minimum, Tier 1 suppliers are risk assessed to ascertain where risks are present and therefore where resources should be allocated to best mitigate the risks where possible.

The Fresca due diligence process for our suppliers uses a combination of desktop risk assessments, engagement with suppliers, supplier self-assessment questionnaires, audits and other external factors such as information databases and known industry risk factors. Through this method, suppliers can be ranked and effectively targeted.

Our Policies and Practice

The Fresca Group is committed to reducing the risk of modern slavery and labour exploitation within our own business and supply chain. We recognise that a combination of external factors has created a thriving market for exploiters. The Fresca Group carries out a number of due diligence methods and these have been adapted, where possible, to best suit the external environment with the overarching aim of creating a habitat where exploitation cannot survive.

The Fresca Group has a number of internal policies to protect our own employees from the risk of modern slavery and human trafficking, which are regularly reviewed to ensure they are up to date with legislation and best practice.

We also request ethical standards of our suppliers and expect effective policies to be present within their own businesses, whilst considering the size and nature of their business.

The Fresca Group is resourced to facilitate knowledge and information sharing across the businesses – dedicated, scheduled meetings allow this to take place and information is shared regarding upcoming risks, intelligence, changes to legislation, learnings from the group, examples of best practice and anything else of ethical importance that would benefit the organisation and drive improvement.

If a welfare issue is recognised at one of the Fresca businesses, there is an agreed action plan and each business has a dedicated team of people responsible for the protection, investigation, safeguarding, remedy and preventative actions of the situation.

Audits

Each of the retailer-serving Fresca businesses undertakes third party ethical audits that encompass the ETI Base Code, industry standards, customer requirements and local legislation.

A number of our suppliers also undertake third party ethical audits - this is determined either through risk assessments or our customer requirements.

The Fresca businesses also conduct second party audits on their labour providers, cleaning companies, security companies and suppliers. First party audits are also carried out internally.

Fresca Grievance Mechanisms

Grievance Policy

All employees are given a copy and have free access to the grievance policy when needed.

Fresca Feedback Line

On induction, all employees are informed of their rights during their induction session and every person working on a Fresca site (employee, agency worker or contractor) is encouraged to report any concerns through the Fresca Feedback line.

'Are You OK?' Campaign

Fresca's 'Are You OK?' campaign has previously been recognised by Sedex as an example of Best Practice for worker engagement. The campaign really is as simple as encouraging colleagues to check in on one another and to report any concerns.

Worker welfare chats

Sites conduct worker welfare chats with our employees and agency workers. This builds rapport and encourages work relationships in the hope that either within the chats or at any other time, workers feel confident to approach the appropriate person with any concerns regarding their own, or someone else's, human rights.

Our Effectiveness

There are a number of specific ways we assess and manage the risk of modern slavery within our business and supply-chain which aim to reinforce our culture of 'doing the right thing'. This is represented through a comprehensive system that ensures we remain alive to the issues and have effective ways to address these.

Fresca have also provided training to people outside its own organisation including local councils, NGO's, university students and others within the industry. The last reporting period has seen a total of 1,024 people receive training, taking the total amount of people trained in modern slavery and labour exploitation by Fresca up to 8,918.

Training

Internally, new starters are trained on modern slavery either during their induction or an assigned e-learning module.

Collaboration and Networking

Fresca are involved in an extensive number of networks and collaboration projects including with retailers, industry peers, suppliers, NGO's, authorities, academia and others within the wider food industry:

- Fresca are one of the 14 founding members of MSIN (Modern Slavery Intelligence Network) and have been key members in the development of the project (www.msin.org.uk)
- Fresca are Board Members of FNET (Food Network for Ethical Trade)
- Fresca are associate members of the ALP
- Fresca helped facilitate an industry webinar for UK growers that consisted of a number of panellists sharing solutions to address current issues
- Fresca are part of FNET working groups, presenting and providing information
- Fresca welcomed the new CEO of the GLAA to two of their facilities in September 2021
- Fresca collaborate with suppliers to enhance their ethical competencies and capabilities

Key Projects

Over the last reporting period, the Fresca Group has:

- Collaborated with a retail customer on a Human Rights Impact Assessment
- Heavily contributed to the development of the Modern Slavery Intelligence Network
- Worked with the GLAA on prevention strategies for seasonal workers
- Sponsored Ride for Freedom in their Guinness World Record breaking cycle event, riding the route of many migrants from Southern Spain to the UK to raise funds for their Freewheel programme that empowers survivors of modern slavery to cycle

Our Performance

A key element underpinning our objectives is the monitoring of our supplier's ethical progress and ambition to achieve continuous improvement year on year. Analysis of 74 performance measures used by the Fresca Group to assess risk in this reporting period illustrated that 57 of those metrics have improved, 4 have remained the same while 13 have declined. Analysing the areas of decline, this is partly due to a knock-on effect from the Covid-19 pandemic where training, audits and visits were halted.

Our strategy established for our reporting year ending April 2023 is already underway and we look forward to delivering further improvements for those employed in our business and supply chain.

I, the undersigned, take responsibility for this statement and represent the board of the Fresca Group Ltd for overall ethical compliance:

NAME: *Martyn Fletcher*

POSITION IN COMPANY: *Chief Executive*

DATE: *25th October 2022*

