Foreword

Transparency statements are good for establishing whether a business has positively engaged in tackling Modern Slavery but do little to either protect the employees in our business or mitigate the risks posed by the exploiters. Our statement has been designed to demonstrate that our business group is engaged. However, it will not give specific detail and will only outline (within the scope of current legislation) what we are doing. Detailed information is perceived to be valuable to those external parties who wish to exploit our colleagues.

A simple sentence outlining which company you use for your training and audit activity would give the exploiter valuable information of what processes we are likely to have and therefore an insight into how these can be beaten.

Sadly, we do not believe we alone can stop the criminals from committing their crimes, but we can make it difficult. We will not and cannot suggest our business or supply chain is slavery free and believe that anyone who does is naive. However, we do commit our efforts to take the right actions to attempt to eradicate it.
Modern Slavery & Ethical Trading Statement (continued)
Reporting Period 27 April 2019 - 24 April 2020

Our business today

<table>
<thead>
<tr>
<th>100% owned</th>
<th>Joint ventures and associates</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>primafruit</strong></td>
<td><strong>Avocado Company</strong></td>
</tr>
<tr>
<td><strong>FRESH CLEAR FREIGHT</strong></td>
<td><strong>Thanet Earth</strong></td>
</tr>
<tr>
<td>Logistics and customs service for fresh produce.</td>
<td>Growing, packing &amp; marketing speciality tomatoes, peppers &amp; cucumbers from landmark site in Kent.</td>
</tr>
<tr>
<td><strong>MACK fruit</strong></td>
<td><strong>Manor Fresh Limited</strong></td>
</tr>
<tr>
<td>Importer and marketeer of fresh fruit. Based in Paddock Wood, Kent.</td>
<td>Potatoes and vegetables - marketing and packing.</td>
</tr>
<tr>
<td><strong>Fresh PLUS</strong></td>
<td><strong>The Custom Plum Company</strong></td>
</tr>
<tr>
<td>Fresh produce service solutions, from field to consumer. Based in Paddock Wood, Kent.</td>
<td>Research and commercialisation of exceptional new plum and interspecific stone fruit varieties from the Zaiger breeding programme in South Africa.</td>
</tr>
<tr>
<td><strong>dgm Growers</strong></td>
<td><strong>Wallings Nursery Ltd</strong></td>
</tr>
<tr>
<td><strong>Grape Evolution</strong></td>
<td><strong>Cartama UK</strong></td>
</tr>
<tr>
<td>Marketing and commercial rights management of new table grape varieties.</td>
<td>Marketing the avocado production of the leading Colombian avocado producer, Cartama, in the UK.</td>
</tr>
<tr>
<td><strong>Blue River International Ltd</strong></td>
<td></td>
</tr>
<tr>
<td>Importer and wholesaler of Thai and Asian groceries and fresh produce.</td>
<td></td>
</tr>
</tbody>
</table>

Organisational Structure

Fresca Group Ltd is a privately-owned company with a variety of holdings in the fresh produce industry. The business includes wholly-owned enterprises and a range of joint venture and associate businesses.

Our Business

Our companies supply customers with fresh produce. Our customers are located primarily in the UK, and include multiple retailers, processors, foodservice operators, cruise lines, caterers and other fresh produce packers. Our physical operations are primarily based in the United Kingdom, but products are sourced both within the UK and from international suppliers.
Our values

Flexibility
In our way of working, our service and our direction

Resourcefulness
Finding solutions, even in the toughest of times

Excellence
In our products, our people, our facilities and our performance

Sustainability
Working for a greater future, stronger ethics and longer relationships

Character
A group with diversity, passion and personality; with people who care

Ambition
Driving developments for Fresca, for our people and our partners
Our businesses have established structures implemented to tackle worker exploitation and suitable escalation procedures to manage occurrences as they arise.

The escalation structures are supported with appropriately-resourced management teams, communication systems, training provision, due diligence processes and meeting frameworks.

During the last reporting year, an initiative launched by our communications team was shortlisted for a SEDEX award and we await the outcome from the judges.

The health, safety and welfare of our staff is our primary objective and we are very proud of the work we do, have done and are committed to doing in the future.

Our Supply Chain

The route to market for the products we sell is large and complex. Temporary and seasonal labour is a common feature in our supply chain, and one that we have identified as a significant risk for potential ethical issues. The very broad international nature of our business brings added complexity with considerations such as language, culture, legislation and economics all being significant influences in our supply chain.
Standardisation of approach is being delivered where appropriate and feasible throughout the Group, and our close relationships with recognised and respected bodies in the UK and internationally help provide support for upholding expected standards.

Specifically, within our businesses we have completed detailed risk assessments, mapped and risk rated our labour suppliers and ranked them by priority.

Our supply chain is structured with our owned facilities, co-packers and multiple tiers of suppliers. The scale of this supply chain is massive and has been risk assessed and prioritised to enable suitable allocation of resources.

Mitigation actions to reduce but not eliminate risk have been implemented throughout our supply chain in line with our due diligence procedures.

Business Policy & Practice

We are committed to reducing the risk of slavery and human trafficking within our own business and our supply chains. We recognise that characteristics of modern slavery crimes are hidden and we acknowledge the importance of identifying potential abuse.

The Fresca businesses have a proud track record of ethical practices and we continue to take an industry-leading role to tackle this issue.

Our business was a partner in the creation of this awareness-raising film: https://www.youtube.com/watch?v=d9tN6fM28ws

We are a pragmatic company with strong ethical values at its core and we are engaging directly in our supply chain with ethical initiatives. Our commitment to purchasing Fairtrade accredited products is one way in which our business can demonstrate these long-established, embedded values.

Fresca Group created this video to help demonstrate the impact of Fairtrade purchasing: https://vimeo.com/183633876

Each of our companies has identified its own risks and priorities and is responsible for monitoring and auditing as necessary. We use our group structure to help drive best practice across all our companies. Again, we have been involved in some ground-breaking work, making a real difference.

Where a risk of abuse is identified, a suitable action plan has been agreed and implemented, using respected third parties to monitor and support as appropriate. We are people centric in our approach and ensure we deliver remedy, if possible, in every situation we encounter.
Fresca businesses work closely with their customers on ethical topics and issues. Fresca businesses have been involved in multiple initiatives again this year and we are proud to state that our work has directly affected victims of exploitation and continues to make positive progress. Information is shared freely on request with our customers.

Our due diligence processes include protocols, policies, governance, audit programmes and procedures to manage our supply chains.

We have processes that improve our capability to;

- Prevent and prepare for cases of worker exploitation
- Pursue those infiltrating our organisation and supply chain
- Protection systems in place designed to help protect the most vulnerable
- Train our own colleagues and suppliers
- Manage incidents
- Develop further our KPI measurements and monitor our progress

A full review with the senior leadership team in each Fresca business has been completed for compliance to the Modern Slavery Act 2015. Each business has agreed the strategy for the coming year and the tactics necessary for successful deployment.

For the last year we have reviewed our KPIs and can see improvements in 81% of our measures. We have reviewed what has improved and why and where additional activity is required.

We have reviewed our training progress and are proud to report our industry leading training has reached the following levels:

<table>
<thead>
<tr>
<th>SECTOR</th>
<th>NUMBER OF PEOPLE REACHED</th>
</tr>
</thead>
<tbody>
<tr>
<td>General public (talks and presentations)</td>
<td>3407</td>
</tr>
<tr>
<td>Customers and industry</td>
<td>335</td>
</tr>
<tr>
<td>Colleagues within Fresca businesses</td>
<td>1790</td>
</tr>
<tr>
<td>TOTAL REACH</td>
<td>5532</td>
</tr>
</tbody>
</table>

Our external networking and leading engagement activity with authorities, government, NGOs, retailers, and our supply chain has also been reviewed.

Furthermore, the effectiveness of intelligence networks has been reviewed as well as our internal scorecards and our performance against last year’s strategy.

The Independent Anti-Slavery Commission has published a Maturity Framework against which organisations can assess their progress and practice. An assessment for Fresca Group companies within this framework shows compliance to “Leading on Human Rights Innovation” status.
Criteria to meet for compliance at this level are stated as:

• **Board leading on human rights strategy**
• **Using data analytics to identify risk**
• **Local, national, international intelligence gathering**
• **Supporting suppliers to develop ethical competencies**
• **Pioneering new ways of worker engagement, using technology**
• **Factoring in the true cost of labour**

We are not perfect but our identification of issues and our ability to work with the relevant authorities to resolve has proven to be effective.

Each of the Fresca companies has a nominated lead Ethical Manager. This is coordinated at a group level by the Group Compliance Director. Relevant training and professional development opportunities are provided and a company-wide awareness training programme for all colleagues is available and in the process of group-wide deployment.

Where a Fresca Group company uses an employment agency then such contracts are overseen by individuals trained in Gangmasters & Labour Abuse Authority requirements and procedures. There are also regular reviews and audits conducted within the business and supply chain where deemed appropriate.

New employees within a Fresca Group company are informed of their rights during an induction session. Every person working in a Fresca Group company (whether an employee, agency employee or contractor) is entitled to use the Fresca Feedback telephone line to report concerns. This service is publicised widely and frequently through the business.
Modern Slavery & Ethical Trading Statement (continued)
Reporting Period 27 April 2019 - 24 April 2020

Our strategy established for 2020/21 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 Fresca Group Ltd for overall responsibility for ethical compliance.

NAME

POSITION IN COMPANY
Chief Executive

DATE
1st August 2020

Questions regarding this statement or requests for further information should be made to:

Shayne Tyler, Compliance Director
Email: shayne.tyler@frescagroup.co.uk
Tel: +44 (0)1892 831595