

The **CFUK Technical Team** conducts or oversees a programme of regular audits of the supply chain which cover staff welfare and labour provision.

The **CFUK HR Team** are responsible for ensuring that all management and relevant staff have attended the requisite training and also for raising awareness of the signs of modern slavery amongst the wider workforces. The HR Officer is also responsible for regular auditing of agency labour providers.

The **CFUK Ethics Committee** exists to monitor and investigate any alerts raised through a new online portal which has been set up to augment the other existing methods for whistleblowing or raising concerns. This committee comprises the Managing Director, HR Officer and a nominated Ethics Referent.

Training

All senior managers attend Continuous Professional Development (CPD) accredited training courses on tackling Modern Slavery in supply chains provided by Stronger Together, and they have responsibility for developing and operating company procedures relevant to this issue. Training needs are regularly assessed as an operational routine and delivered as and when required to new employees or those requiring a refresher. The training covers:

- CFUK's purchasing practices
- How to assess the risk of slavery and human trafficking
- How to identify the signs of slavery and 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 company
- External assistance that is available
- Guidance for suppliers and other business partners/contractors to implement anti-slavery policies
- 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 company's supply chain

Awareness-raising programme

As well as training staff, the company has raised awareness of modern slavery issues by providing relevant information via workplace posters and on the internal intranet system. These explain to staff:

- The basic principles of the UK Modern Slavery Act 2015
- How employees 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
- External assistance that is available
- How to assess potential suppliers for risk

All UK employees had received communications related to awareness raising. By the end of 2019, all senior managers had attended workshops on Tackling Modern Slavery in either the UK, or the global supply chain, or both. These workshops are run by the Stronger Together initiative. Further training in UK Anti-Corruption law has been carried out in 2020.

Policies

CFUK has issued a number of policies to set out the approach to tackling modern slavery and human trafficking which are contained within the Employee Handbook. These include: Young Worker and Child Labour, Freedom of Association, Agency Workers, Grievance and Whistleblowing. A Modern Slavery policy sets out the company's overall approach along with confirmation of the actions to undertake when anyone suspects there might be incidents of modern slavery.

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Compagnie Fruitière UK Limited (CFUK) has taken to understand the potential modern slavery risks related to its business and to put in place procedures to ensure that its own business and supply chain is free from slavery and human trafficking.

CFUK recognises there is scope for slavery and human trafficking in its supply chain and has a zero-tolerance approach to it in any form, in both its own operations and its supply chain.

Company structure & activities

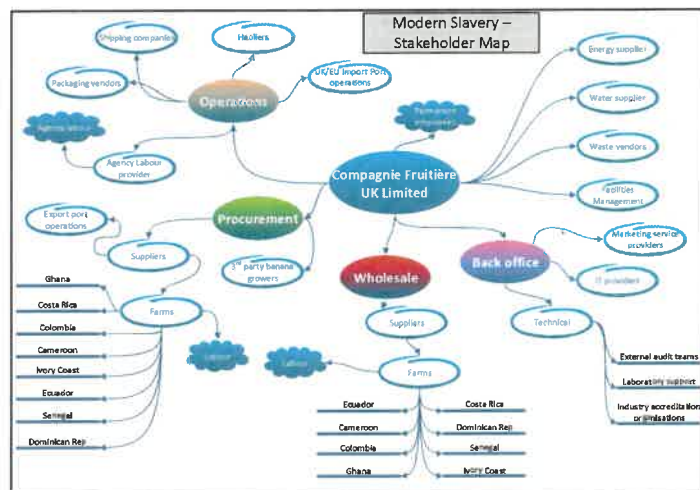
CFUK is primarily engaged in the importing and distribution of bananas, pineapples and other fruit destined for the UK retail and wholesale and processing markets. It is a subsidiary undertaking of Compagnie Fruitière Paris, a company incorporated in France. CFUK is part of the wider Compagnie Fruitière group of companies. Compagnie Fruitière Paris is also obligated under French Due Diligence law, which is designed to ensure that the company has plans to identify risks and prevent infringements on human rights, fundamental freedoms, health and safety and the environment within both its own activities and those of companies under its control, and suppliers and sub-contractors. As a subsidiary company CFUK is indirectly obligated under the French law, and has fully complied with requirements as set out by the Group Legal team in accordance with this.

CFUK undertakes the import, warehousing, distribution, ripening, packing, and supporting back-office functions solely within the United Kingdom, in two primary locations – London Gateway and Wigan. The workforce comprises a mixture of permanent and agency labour.

CFUK imports fruit from group-owned farms as well as independent fruit growers based in Central America, Caribbean and West and Central Africa.

CFUK utilises a group owned shipping line (Africa Express Line), which operates a number of vessels, to ship fruit from African growing countries into the UK and Europe. It also utilises other shipping companies to perform a similar role when required.

CFUK owns a number of freight lorries to support its UK based logistics operation and also sub-contracts this work to recognised hauliers as and when required.



CFUK Supply chain stakeholder map

The company also subcontracts work to a number of vendors to support the UK depots' facilities management work in areas such as cleaning, engineering and waste management.

Responsibility for anti-slavery and human trafficking initiatives

The company handbook makes it clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of ethical conduct both from its own employees and within the extended supply chain. The **CFUK Managing Director** is ultimately responsible for implementation of all anti-slavery initiatives and ensuring adherence to the Modern Slavery Statement, however all employees are expected to share responsibility to look out for, report and if necessary, act on any instances of suspected modern slavery. They are supported in this through a training programme.

Whistleblowing

CFUK encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chain of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Whistleblowing alerts can be registered by a number of methods, whether through free 24-hour confidential helpline, directly with the HR team or in a confidential and locked letterbox. Whistle-blowers are able to retain their anonymity if desired.

Supplier/Procurement Code of Conduct

CFUK is committed to ensuring that their suppliers adhere to the highest standards of ethics. All active produce suppliers are required to be members of SEDEX. Prospective suppliers are subjected to a comprehensive due diligence process, which includes a focus on their ethical management of labour and prevention of slavery and forced labour. This due diligence process is overseen by the company's Procurement Director.

All standard supply agreements reiterate CFUK's policies on Ethical Trading, Responsible Use of Labour Providers in Supply Chains and Forced Labour and Anti Modern Slavery and potential suppliers are required to acknowledge that they have read and understood these as part of the process of agreeing a supply contract.

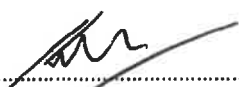
Once engaged, suppliers are required to continually demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the relevant country's law in their use of labour. This confirmation is performed through a self-assessment questionnaire which suppliers are obligated to submit in order to be members of SEDEX. CFUK risk assesses and works with suppliers to ensure that they meet these standards and improve their worker's working conditions.

Failure of a supplier to meet the necessary audit standards or to act on any non-conformances within a specified period will lead to sanctions up to and including suspension of business with that supplier.

Risk assessments are maintained to identify countries at risk of incidences of modern slavery; this data is shared with customers where relevant. As of the date of this statement, all growers throughout the supply chain are assessed to be low risk or medium risk. Those at medium risk are monitored for progress towards becoming low risk operations. The risk scoring system determines whether a specific ethical audit is mandatory, recommended, or not required.

Recruitment/Agency workers

CFUK 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. CFUK only forms contracts with UK agency labour providers that are GLAA registered. Labour suppliers are audited every 6 months by the HR Officer. Management at CFUK have signed up to the GLAA Active Check facility which reports on any changes to the status of any labour providers' GLAA licences. CFUK has long-standing relationships of over 4 years with the current agency labour providers at both London Gateway and Wigan depots.

Signed.....

Keith Sadler, Managing Director

Date: 03/06/2021