

HR POLICY ON PREVENTING HIDDEN LABOUR EXPLOITATION



POLICY STATEMENT

We are committed to improving our practices to combat slavery and human trafficking.

ORGANISATION'S STRUCTURE

We are a global provider of alliums in the supermarket and wholesale markets sectors. We are the parent company of the Oldershaw Group (Group). The Group has over 250 employees and operates in the UK. The Group has a global annual turnover in excess of £40m

OUR BUSINESS

Our business is organised into 4 business units: Oldershaw of Moulton Limited, which is a company connected to Moulton Bulb Company Limited, and its subsidiary companies Goldwood Moulton and Moulton Bulb Imports Limited. The Oldershaw Group is a trading name of the 4 business units.

OUR SUPPLY CHAINS

Our supply chains include: Onion and garlic growers and producers in Spain, Chile, New Zealand, Egypt, Argentina and Holland among other countries.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we undertake due diligence on our supplier companies and customers.

1. In the produce we grow and the processing we undertake in the UK we only use our own direct employees (and undertake all checks required under current legislation) or agency workers supplied by agencies authorised by the Gangmasters Licencing Authority.
2. We train all of our staff on the importance of the issue and actively encourage them to report any concerns that they have from whatever source.
3. With our overseas suppliers we trade only with businesses who are prepared to confirm that they will abide by our anti-slavery policy (or who have an equivalent policy of their own).

In those overseas suppliers where they have an equivalent to the Gangmasters Licencing Authority we insist that any agency staff supplied are supplied by a duly authorised business.

HR POLICY ON PREVENTING HIDDEN LABOUR EXPLOITATION



4. We have senior managers visit our overseas suppliers on a regular basis who are trained to identify any issues of concern regarding modern slavery. If any are noted they are fully investigated and, if any concerns continue, we will terminate our commercial arrangements.

We believe the above systems are sufficient to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we require our suppliers to certify their adherence to our Anti-Slavery Policy and/or adhere to their own which must be substantially equivalent to ours.


TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we provide training to our staff on the Anti-Slavery Policy.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We endeavour to undertake an unannounced review each financial year to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking statement for the financial year ending September 2019.

Signed 
Position Director
Date 03/04/2019