

## **Modern Slavery and Human Trafficking Statement 2021**

It is Grapes Direct Ltd policy that Modern Slavery and Human Trafficking is absent in all forms from any part of our supply chain, both within our business and our supplies chains through to raw materials. Grapes Direct has taken steps to identify potential risks within the financial year.

Grapes Direct Ltd has a zero-tolerance approach to any kind of Modern Slavery within our business and supply chains. It is our responsibility to understand the risks in our own business and our supply chain to ensure our management of risks is effective. We must ensure any identified issues are effectively remediated and necessary support provided. We are committed to transparency in our supply chain and the monitoring the risks of modern slavery and human trafficking.

### **Our Business**

Grapes Direct Ltd is an importer of table grapes and supplier to retailers and wholesalers based in the UK. Grapes Direct Ltd supplies quality fresh table grapes to major retailers. As of 2021 we employ 14 people all based in UK. We source product from up to 11 countries, from suppliers, cooperatives and growers.

Our business is based on one office in Yalding, working with two service providers packing and storage sites in Essex and Lincolnshire. Grapes Direct import table grapes from South Africa, Chile, India, Morocco, Egypt, Spain, Italy, Greece, Brazil, Peru and Namibia. The nature of this work is seasonal and so we are aware of the ethical risks involved with this type of work.

We understand slavery, servitude, forced labour and human trafficking is a major issue, especially considering global migration, refugees fleeing from war, poverty or famine.

### **Due Diligence and the Supply Chain**

We understand that our supply chain and our suppliers supply chains are at risk of being exposed to Modern Slavery. We understand the need for ongoing and regular reviews. We require our suppliers to commit to comply with our due diligence undertaking which details and defines Ethical trading and the requirement to prevent Modern Slavery and Human Trafficking in the supply chain.

Our packing sites who use agency labour require agency providers to be registered and members of the Gangmasters Licensing Authority audit programme. These labour providers are subjected to audits which involve in-depth interviews with personnel to help identify any indication of Modern Slavery. The packing sites in the UK are audited to the third party Sedex Members Ethical Trade Audit, the audit report and corrective actions are published on the Sedex website and is visible to us and our customers.

### **Policies on modern slavery**

We require our supplier sites for produce and packaging to comply with the Ethical Trade Initiative base code. They are required to be Sedex members, giving us and our customers full visibility of their Ethical due diligence. We require suppliers to have ETI Base Code SMETA audits on a risk-based programme, and published these audits on Sedex with full visibility, including all non-conformances completed to the auditor's time scale and closed off. In addition, other certification is encouraged, which includes SIZA in South Africa and Rainforest Alliance. Growers are required to be certified to GLOBALGAP Risk Assessment on Social Practice; this is a farm level audit linked to GLOBAGAP certification.

## **Risk Assessment**

We conduct risk assessments of our supply base and have conducted many overseas visits to source countries, including high and medium risk zones to specifically look for signs of Modern Slavery. We have not identified issues of the nature but remain constantly vigilant in both audits at source and day to day running of the business. It is critical to build trust in the supply chain by building relationships with suppliers to help identify the incidence of modern slavery.

All suppliers are risk assessed and must be ethically approved by Grapes Direct Ltd before supply commences. We use a combination of risk assessment tools including customer, Sedex and our own knowledge of first-hand experience with suppliers. Full visibility of our supply chain is managed and monitored using our bespoke approval system.

Engagement and collaboration with our stakeholders are important to help identify and prevent modern slavery with our supply chain. We encourage all suppliers to attend Ethical training and workshops. In higher risk zones such as India, we employ Ethical training workshops for growers and packhouse workers using an independent group, IRfT in India.

## **Training**

Senior management is trained in the highest Ethical standards including, SA8000, ETI and Stronger Together in order to identify Modern Slavery and Human Trafficking. Employees are able to identify and report any concerns with Modern Slavery via senior management and allows a full investigation without putting personnel at risk.

Production and agency staff view the Stronger Together training materials including the video on forced labour, with the use of posters in relevant languages clearly visible throughout the packing sites.

The senior management team are responsible for compliance, with the Technical Director overseeing this work. Our Technical team attend industry events, seminars, training courses, monitor in country bodies and resources and are recipients of industry alerts to ensure we remain up to date.

Our Technical team monitor training, awareness and information sent to our suppliers of services, produce and packaging.

## **Assessment of Modern Slavery risk within our business and supply chain.**

Within our own business Modern Slavery is absent. We have not identified areas of significant risk or instances of Modern Slavery in our supply chain. We continue to be vigilant for the potential risks.

We will continue to work closely with our suppliers in order to identify risks and where necessary address issues.

Any identified incidents of Modern Slavery will be investigated, followed up, non-conformances identified, the necessary help given to resolve issues.

This statement is made in pursuance of section 54 (1) of the Modern Slavery Act 2015 for the year 2020/21 and will be reviewed each financial year.