



Westfalia Fruit UK Modern Slavery Statement

2022/23



Introduction

Greencell was established in April 2000 by an MBO of several Albert Fisher business units. The acquisition of Greencell Ltd in 2008 by Westfalia Fruit was integral to the vertical integration of the company, then becoming one brand, as Westfalia Fruit UK from 2022 as part of the full integration of the Westfalia Fruit Group.

This is Westfalia Fruit UK fifth modern slavery statement following the introduction of the Modern Slavery Act 2015. Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a 'slavery and human trafficking statement for each financial year of the organisation'. The statement refers to our financial year ending 31st December 2021.

This statement provides an update on progress made since our last statement and sets out our planned actions to continue to ensure that slavery and human trafficking are not taking place in either our core operations or our supply chains.



About Westfalia Fruit UK

Westfalia Fruit UK is part of the Westfalia Fruit Group which in turn is part of Hans Merensky Holdings which is governed by the Hans Merensky Trust. Westfalia Fruit UK operates from two sites in the UK: Kings Hill and Spalding. The ripening, packing and supply of avocados to major high street retailers and the wholesale markets is the predominant business.

Westfalia Fruit is recognised as being one of the largest growers of avocados worldwide with the reputation for supplying superior, organic, Fairtrade & conventional quality fruit year-round. Westfalia Fruit is a truly vertically integrated company operating oil and fruit processing plants producing avocado oils, guacamole, and dried fruit. Westfalia Fruit Group sales offices are in the UK, Europe, North America, Latin America, and Southern Africa.

Westfalia Fruit UK is committed to acting under the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Westfalia Fruit UK has developed and embedded a human rights policy framework that addresses human rights, which includes the risk of modern slavery.

Westfalia Fruit UK are committed to ensuring there is transparency in our approach to tackling modern slavery within our operations and throughout our supply chains. We require that our suppliers comply with our policies and codes to eradicate the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude within their own business and that of their supply chains

Governance

Overall responsibility for modern slavery sits with our Senior Management Team and our Modern Slavery Statement is signed off by the Westfalia Fruit UK Board of Directors.

Elizabeth Williams, CSR Manager, is the nominated person responsible for ensuring that efforts are made to investigate and remediate the risk of Modern Slavery in Westfalia Fruit UK business and supply chains.

Supply Chain

Westfalia Fruit UK has built long-term relationships, greater than 10 years, with many suppliers throughout the world to include South America, Africa, and Europe. All products are sourced from approved nominated suppliers who pass Westfalia Fruit UK stringent supplier approval verification process and meet Westfalia Fruit UK high ethical expectations and standards within their supply chains.

Within our operation in the UK, we source goods and services to operate our business. These range from Labour Providers, Stationery Suppliers, Printing Suppliers, Laundries, and cleaning equipment suppliers. Westfalia Fruit UK continually engages with those suppliers deemed to be the highest risk within this group.

United Nations Sustainable Development Goals (SDGs)

The United Nations Sustainable Development Goals (SDGs) have been developed to make the world more sustainable by 2030 in challenges as diverse as ending poverty to tackling climate change. Westfalia Fruit UK supports the aspirations of the SDGs and we have identified specific Goals where we think we can make a real contribution related to our areas of expertise and main areas of operation which is outlined in our Ethical Strategy, Environmental Strategy and Human Rights Due Diligence Framework

Our Approach

Westfalia Fruit UK is committed to acting under the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Internal Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Westfalia Fruit UK has developed and embedded a human rights policy framework that addresses human rights, which includes the risk of modern slavery. Westfalia Fruit UK are committed to ensuring there is transparency in our approach to tackling modern slavery within our operations and throughout our supply chains. We require that our suppliers comply with our policies and codes to eradicate the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude within their own business and that of their supply chains.

Policies

Westfalia Fruit UK is committed to ensuring that there is no modern slavery or human trafficking within the supply chains or in any part of the business. Westfalia Fruit UK modern slavery policies and procedures reflect our commitment to acting ethically in all business activities and relationships. The policies and procedures are based on universally recognised standards such as the ETI Base Code, UN Guiding Principles on Human Rights, and the UK Modern Slavery Act (2015).

- Ethical Policy
- Human Rights Policy Statement
- Anti-Bribery and Corruption Policy
- Whistleblowing policy
- Preventing Unseen Labour Exploitation Policy
- Policy on Forced Labour within the supply chain
- Responsible Recruitment Policy
- Child Labour Policy
- Positive Work Policy
- Grievance Procedure



We believe that the risk of slavery, human trafficking and child labour within our organisation is substantially mitigated by the policies, practices, and training that we have in place.



Risk Assessment & Due Diligence

Westfalia Fruit UK has a risk assessment methodology in place for all supply goods for resale which assess ongoing modern slavery risks within our supply chains using a combination of country-level information sources, audit results, SEDEX, Global Slavery Index, ITUC and ILAB.

Westfalia Fruit UK, Ethical Risk Assessment Tool which risk rates "Tonnage, Labour Risk, County of Origin, Public Risk, Brand Risk, Vulnerable Worker, FOA Risk and using data from the Maplecroft Human Risk Atlas & Forced or Involuntary Labour Index Maps, SEDEX RADAR, Ethical Audits, SEDEX SSAQ, INTERNATIONAL TRADE UNION CONFEDERATION (ITUC) and the Global Slavery Index. Based on the result generated from the risk assessment; "Green" will mean the grower can supply with no further action, "Amber" further clarification required on ethical hotspots i.e., grievance, recruitment of labour, transport, and accommodation, this is done using specific questionnaires, possible grower visits or third-party audits, "Red" not currently fit for supply further investigation / discussion required. Westfalia UK risk assesses its suppliers and service providers as outlined in this ethical strategy. Westfalia UK looks to always support its suppliers in continuous improvement from an ethical perspective, through its corrective action plans/questionnaires, visits etc

Westfalia Fruit UK high-risk suppliers are ethically audited to grower level by 3rd party auditing bodies. In South Africa suppliers undergo SIZA audits frequency determined by the auditing body or Rainforest Alliance audits, and in other countries, suppliers undertake SMETA, Fair for Life, Rainforest Alliance, and GRASP on an annual basis,

Westfalia Fruit UK undertakes 3rd party SMETA audits every 2 years. Our labour providers are Gangmaster & Labour Abuse Authority (GLAA) licenced and are independently 3rd party audited on an annual basis.

Westfalia Fruit UK uses The Sedex Forced Labour Indicators tool to assist Westfalia Fruit UK in understanding where potential indicators of forced labour have been identified within our supply chain. The tool draws on non-compliance and observations raised during 3rd party SMETA audits at supplier sites that are linked with Westfalia Fruit UK on SEDEX. Westfalia Fruit UK monitors those definite indicators every quarter and takes action to ensure that all workers within our supply chain are receiving decent work, in line with Sustainable Development Goals (SDGs).

In 2021, we started to use the Stronger Together Progress Monitoring Tool. This is a pioneering online self-assessment supporting companies to measure their progress and to highlight their next steps in addressing modern slavery risks within their businesses and supply chains. This tool forms one of our Modern Slavery KPI for improving yr. on yr. scores.

Westfalia Fruit UK is a "Full Member" of the Ethical Trading Initiative (ETI), A&B member of The Supplier Ethical Data Exchange (SEDEX), Members of Assured Labour Providers (ALP), Members of Sustainability Initiative of South Africa (SIZA) and members of the Spanish Ethical Trade Forum.

Westfalia Fruit UK vision is for workers to be fairly treated and rewarded in working conditions that are safe and secure with the freedom to develop and grow their careers. Westfalia Fruit UK aims to achieve this by working in close collaboration with its growing operations, Westfalia Fruit, and long-term partner growers; communicating the ETI base code requirements in a targeted fashion in line with the company's objectives and targets as described in Westfalia Fruit UK ethical strategy. Westfalia Fruit UK ethical strategy has been developed following a thorough risk assessment of its supply base. Informed by our risk assessments, Westfalia Fruit UK conducts due diligence across our operations and our supply chains by monitoring for indicators of any form of modern slavery and to ensure that there are sufficient controls in place.



Westfalia Fruit UK conduct careful assessments of prospective new supply chain partners to ensure that they meet the obligations set out in the ETI Base Code, UN Guiding Principles on Human Rights, and the Modern Slavery Act, this runs parallel and supports with delivering the “Human Rights Action Plan framework” that Westfalia Fruit UK reports on, which is detailed below within our own operations and that of our supply chain.

Westfalia Fruit UK, ethical, technical, and buying teams meet formally with key suppliers, at least annually, to specifically discuss human trafficking and worker welfare in their supply chain. The CSR Manager, Responsible Sourcing Managers and the Technical Team will visit the supplier’s premises; providing an opportunity to observe “business ethical activities, working conditions, recruitment practices and carry out worker interviews to ensure suppliers are not breaching the ETI Base Code or the Modern Slavery Act.

Supplier scorecards are compiled for each supplier at the end of the season review which includes “compliance to Westfalia Fruit UK Ethical Policy”. Ethical KPI’s are reported monthly to the Senior Management Team.

Westfalia Fruit UK also participates in collaborative Due Diligence with Non-Governmental Organizations, Customers, stakeholders to make meaning full change. Examples are (Spanish Ethical Trading Forum, ETI working group on Social Dialogue in Peru and &Wider).

Adherence to Our Values and Ethics

Westfalia Fruit UK operates a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business activities and operations. Westfalia Fruit UK is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within its supply chain by exercising strong policies and procedures as part of a robust, developing due diligence framework.

In accordance with section 54(4) of the Modern Slavery Act 2015; Westfalia Fruit UK works with first-tier suppliers to ensure slavery and/or human trafficking is not taking place within their own supply chains. Each supplier signs Westfalia Fruit UK "Policy on Forced Labour within the supply chain" demonstrating their commitment to identifying and eradicating anti-slavery and human trafficking.

Westfalia Fruit UK is committed to carrying out business with suppliers who are working to ensure continuous improvements are made within their own operations and that of their supply chain

Deloitte Tip Offs Anonymous Whistleblowing Hotline

Whistleblowing hotline is now in place for temporary and permanent workers at Westfalia UK the aim of the hotline is to report workplace dishonesty, while remaining totally anonymous which serves as a valuable practical deterrent against dishonest or inappropriate behaviour within our organisation. The Deloitte Whistleblowing hotline has been put into place within all Westfalia operations. The Whistleblowing Hotline is managed via the Westfalia group in South Africa and is communicated down to the relevant HR Business Departments within the group if a complaint is raised





Stronger Together Business Partners

In 2022 Westfalia Fruit UK gained Stronger Together Business Partner Status. Stronger Together is a multi-stakeholder, business-led initiative aimed at reducing modern slavery, particularly hidden forced labour, labour trafficking and other 3rd party exploitation of workers.

Key Performance Indicators

We measure the success and performance of responsible sourcing activities by tracking key performance indicators (KPIs). A similar set of KPIs relating to our modern slavery programme have been put into place.

Training

All Westfalia Fruit UK employees receive awareness training concerning Modern Slavery upon induction. Specific e-learning courses on modern slavery themes are also available to our employees via web-based platforms. Employees who have direct responsibility and involvement with the engagement of workers receive comprehensive Modern slavery training. We also require that our UK labour providers undertake Stronger Together Modern Slavery training and deliver modern slavery training to temporary workers upon induction.

Focus Areas

As part of our robust due diligence process, we will continue to identify, address, mitigate and remediate actual and potential instances of labour exploitation and forced labour within our business and supply chains.

In 2021 we undertook the following: -

- Defined site performance indicators for the business to measure performance and show improvements in human rights due diligence
- Promoted worker voice mechanisms by partnering up with &Wider and our labour provider
- Undertook Human Right Due Diligence assessments on our labour providers to identify risk
- Improving access to effective worker representation at Tier 1 & 2 sites
- Rolled out training on the focus of modern slavery and forced labour within our supply base and own business operation.
- Continued development and roll-out of Westfalia Fruit UK Human Right Due Diligence Action Plan

In 2022 our key areas of focus will be the following: -

- Continue to risk assess our business and establish action plans in prioritised departments to address identified risks and establish further due diligence procedures as outline in our Modern Slavery Action plan.
- Continue to collaborate with stakeholders and relevant 3rd parties to align our Human Right and Modern Slavery strategies
- Continued development and roll-out of Westfalia Fruit UK Human Right Due Diligence Action Plan

This statement has been approved by the Westfalia Fruit UK Board of Directors and is made in accordance with Section 54(1) of the Modern Slavery Act 2015.



Alk Brand
Group Chief Executive Officer
12 September 2022
Westfalia Fruit UK



Westfalia Fruit UK is a trading name of Greencell Limited, a company registered in England and Wales with registration number 03953231.