



AMFRESH GROUP UK Modern Slavery Statement

Tax Year 2023-2024

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INTRODUCTION

This is the first AMFRESH Group UK Limited Modern Slavery Statement, after six years of publishing separate statements for AMT FRESH Limited and AMFRESH UK Limited. AMFRESH Group UK Limited is made up of AMT FRESH Limited, AMFRESH UK Limited, AMK FRESH Limited and AMFRESH Food & Drink Limited.

At the AMFRESH Group UK Limited, our strong presence in FRESH spans an end-to-end operation in citrus, table grapes, top fruit, tropical fruits, ambient veg and plant-based fresh goods delivering comprehensive solutions for our strategic partners and global consumers.

We understand that Modern Slavery and Human Trafficking is a significant risk within our own operations and our global supply chains for which we must be diligent in our approach.

This statement covers the steps our businesses have taken to prevent and mitigate modern slavery and human trafficking risks in our own businesses and supply chains in accordance with the Modern Slavery Act 2015.

At AMFRESH Group UK Limited the UK Commercial Director takes board responsibility for our work addressing Modern Slavery. The strategy is devised by our Group Sustainability Director and implemented by our Human Resources and Sustainability teams.

OUR OWN OPERATIONS

AMFRESH Group UK Limited have a centralised Talent Acquisition team who are dedicated to our resourcing requirements, and digital systems in place to monitor progress against our recruitment practices and perform security checks. AMFRESH conduct internal audits twice yearly, and our Labour Provider is also engaged in the external SMETA audit every 2 years for our operational sites at Alconbury, Peterborough and Whitemoss. The audits examines processes and practices in relation to legal compliance and the ETI base code principles, above and beyond legislative requirements.

SUPPLY CHAIN

At AMFRESH GROUP UK Limited, raw materials are sourced and purchased based on suppliers' instructions including pricing, quality, supply chain services and their technical, ethical and sustainability standards. The main raw materials currently sourced are citrus, grapes, melons, pineapples, top fruit and ambient vegetables.

During 2023-2024 Tax Year we had supply from a total of 29 sourcing countries (See Appendix 1 for further detail). We work with more than 100 suppliers, and even with close and strong relations with our suppliers we stay alert to identify any potential ethical risk in our supply base and encourage them to identify risk within their own business.

Within the past year, AMFRESH UK Limited has rolled out a new Human Rights standard and set of Human Rights Due-Diligence requirements, with the aim of enhancing the work being done in our supply-chain to prevent Human Rights Abuses.

A key development within this reporting period was the merging of the ethical compliance teams from AMFRESH UK Limited and AMT FRESH Limited. Responsibility for both businesses supply chains now sits under the Group Sustainability team. This has allowed us to reduce duplication and enhance our relationships with the supply chains further, with the ways of working being aligned fully in the year 2024-2025.

Commitments on ethical trade, human rights and modern slavery are set out in several practices, standards and protocols, including the following.

- Our Terms of Trade where we gain suppliers commitment to the ETI Base Code.
- Our Human Rights Policy outlining our commitments to responsible sourcing, the ETI Base Code and prevention of modern slavery.

- Our implementation of different customer's Human Rights Due-Diligence requirements.
- Our approach to transparency and protecting the rights of workers in our supply chains, including no forced labour.
- Our 'Employer Pays Principle' Policy where we lay out our expectations to suppliers in relation to recruitment fees.
- Our Supplier Sustainability Requirements for AMFRESH UK Limited, where we detail our minimum compliance expectations and our goals for suppliers related to upholding standards and continuous improvement. The supplier due diligence packs are sent out to all suppliers at the start of the season.
- Our AMT Worker Welfare & Ethical Undertaking Commitments.
- Forced Labour Self-Assessment Questionnaire (SAQ).

This renewed approach is helping us to identify more potential areas of risk and indicators of forced labour. We have also expanded the number of ethical audits completed in the supply chain through this practices, leading to increased transparency and a greater chance of uncovering instances of forced labour and helping tailor our actions to tackle modern slavery and ensure that we are working in the areas that need it most.

Adherence to our practices and standards is monitored and reported as part of Key Performance Indicator structures and relayed back to suppliers as part of their annual reviews and scorecards.

Risk Assessment, Prevention and Mitigation

AMFRESH UK Limited have developed throughout the years a risk assessment methodology for all suppliers of raw material, using a mix of the inherent-country risk ratings as those provided from FNET, along with other sources of data such as SEDEX, the UNDPs Human Development Index and Gender Inequality Index, ITUC Global Rights Index, Children's Rights and Business Atlas, Freedom in the World report, Trafficking in Persons report and the Walk Free Global Slavery Index (GSI).

We also monitor media reports and data sources such as SEDEX, the US Department of State Country Reports on Human Rights Practices, the US Department of Labour International Child Labor & Forced Labor Reports and reports from local media sources and NGOs. Where there is an emerging high risk of forced or child labour, or confirmed cases within agriculture or even the products we source, we will undertake enhanced due diligence as needed. This year, we also introduced the full version of the Forced Labour SAQ to the AMFRESH UK Limited Supply Chain, collecting information specifically related to how suppliers and sites manage the risk for forced labour in the supply chain. A new format of this questionnaire has now been fully rolled out at AMFRESH UK, with implementation for AMT FRESH planned for the 2024-2025 financial year.

To maintain knowledge of current and developing global issues we conduct horizon scanning and review our methodology on a yearly basis. This includes inputs from several professional bodies such as ETI, Sedex, SIZA, FNET, GLAA, Human Rights watch, Stronger Together, Ethical Corp, Global Slavery Index, UN SDG News, Fairtrade and ILO.

When onboarding new suppliers or sourcing countries, we conduct assessments which include a review of the modern slavery risks and contribute to our procurement and commercial decisions, along with any new supplier's capacity to mitigate these risks. Where we know there are severe risks in-country, confirmed cases of modern slavery within our industry or political and socioeconomic conditions changing in a way that workers can be affected, we will conduct **enhanced due-diligence** work with suppliers. This could include in-depth assessments of policies and practices, recommendations for training or putting suppliers in contact with local NGOs who can support. We will also look at capacity building and reviews of management systems to ensure suppliers have the capability in-country to monitor the risk of modern slavery, along with the knowledge needed to both prevent and detect modern slavery in their operations and supply chains.

We will continue to diligently monitor potential indicators through the analysis of nonconformances and our assessments alongside continued collaboration and communication with our supply chain.

RESPONSE AND REMEDIATION

We would investigate any potential allegation of Modern Slavery that might be reported in the areas and communities we operate in. Any case of forced labour or slavery will be covered under our Serious Incidents in the Supply Chain policy, or our internal response plans which include collection of details, investigations and actions to remediate and prevent future cases.

Audit Management

As mentioned previously, there are a wide range of ethical audits and certifications within our supply chains, which our teams monitor. We support suppliers at each stage of the ethical audit, from recommending audit companies, sending reminders for booking the audit on time, reviewing the audit reports and constructing corrective action plans. Should non-conformances (NCs) be raised during ethical audits, our team work closely with the supplier to take action. We share best practices to resolve issues as quickly and effectively as possible. We will work with suppliers on their action plans, aiming to offer advice and support for all audits. We will also monitor trends throughout the season, and where a new issue emerges, we will inform all suppliers which could be affected, so they are aware and can mitigate the issue.

As part of our due-diligence and improvement process we review the results of our supply chains audits on an annual basis, to perform trend analysis and highlight areas of focus for the coming seasons, including potential issues around forced labour and modern slavery. In the last reporting period, out of the NCs in areas related to potential risk indicators, 85% were closed within the reporting window, with the remaining 15% being closed outside of the reporting window but within the deadlines provided by the auditor. So, whilst risks are present, our closure rate is performing well and we engage with all suppliers to work out the best way to close their non-conformances and prevent reoccurrence.

Within the year 2023-2024 there were no confirmed cases of modern slavery reported, however the NCs show how useful our audit monitoring programme is to reduce the risks at lower tiers of the supply chain. Through robust monitoring and close supplier relationships, when further NCs indicate that improvements are needed we will be able to improve our supply chains capability to prevent modern slavery. Therefore, audit management will remain a key part of our actions going forward.

Training and Capacity Building

In our three operational sites in the UK, Modern Day Slavery training is conducted at point of induction for **all our workers**, regardless of employment status or level of position. Modern Day Slavery principles are discussed covering the concept of labour exploitation and the prevention of human trafficking, how to detect early the signs of potential victims, how to raise concerns, how to get support and where to find further information around our sites. This also includes watching a video from Stronger Together on the subject that brings the topic to life in terms of real-life scenarios.

We display Stronger Together posters, in various languages, across our noticeboards and in our welfare facilities. All management receive training on modern day slavery, how to identify potential cases, who to escalate the concerns to and what not to do if faced with a situation of MDS.

In addition to the Modern Slavery training that covers 100% of our workforce, we also offer additional training from supervisor to senior management levels in multiple forms. Courses have been held by nGaje, Modern Slavery Awareness and High Speed, Human Trafficking and Modern Slavery. During the period covered by this statement, 49 leaders attended these courses (30 in person, 19 online).

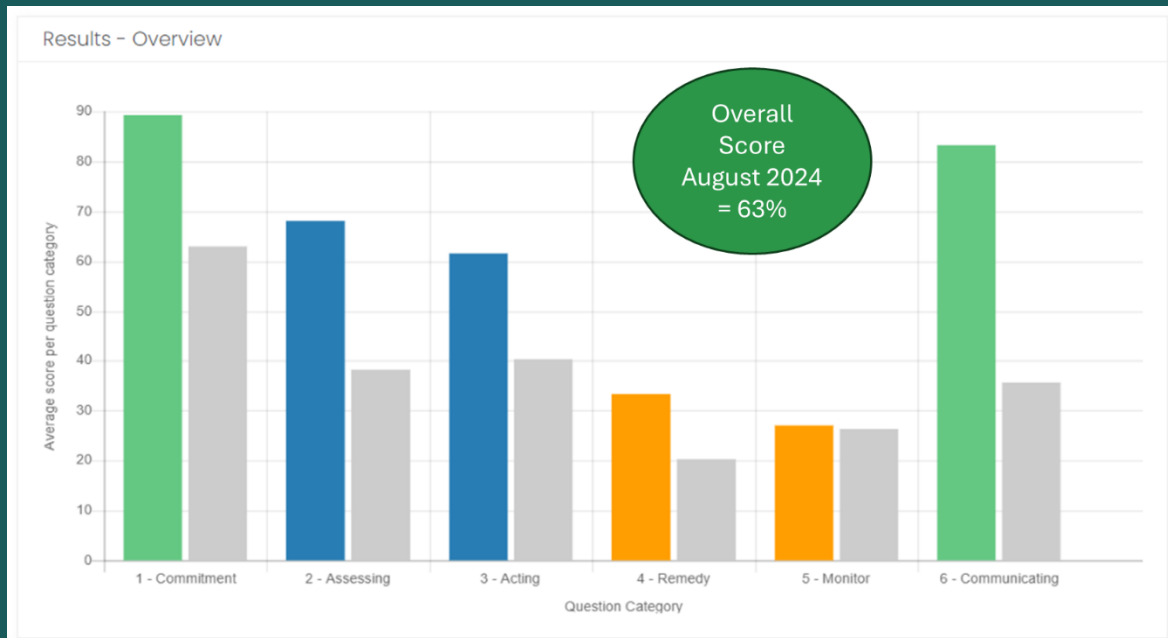
There is also training available for our suppliers in the different countries of origin. We work together with our customers, certification bodies and other institutions to encourage our suppliers to participate. Some of which include:

- Spanish Ethical Trade forums;
- Responsible Recruitment Training organised by Responsible Recruitment Toolkit (RRT);
- Stronger Together courses in South Africa;

- On-site visit to Egyptian Suppliers to engage suppliers on the Egyptian Ethical Trade Forums;
- FNET workstream meetings, event and workstreams which we promote amongst our supplier base.

OUR PROGRESS, FUTURE CONSIDERATIONS AND PLANS

Since we first started using the Stronger Together Progress Reporting Tool (PRT) tool, in July 2021, we have increased our score from 30% to 63%. The details of our last score are below:



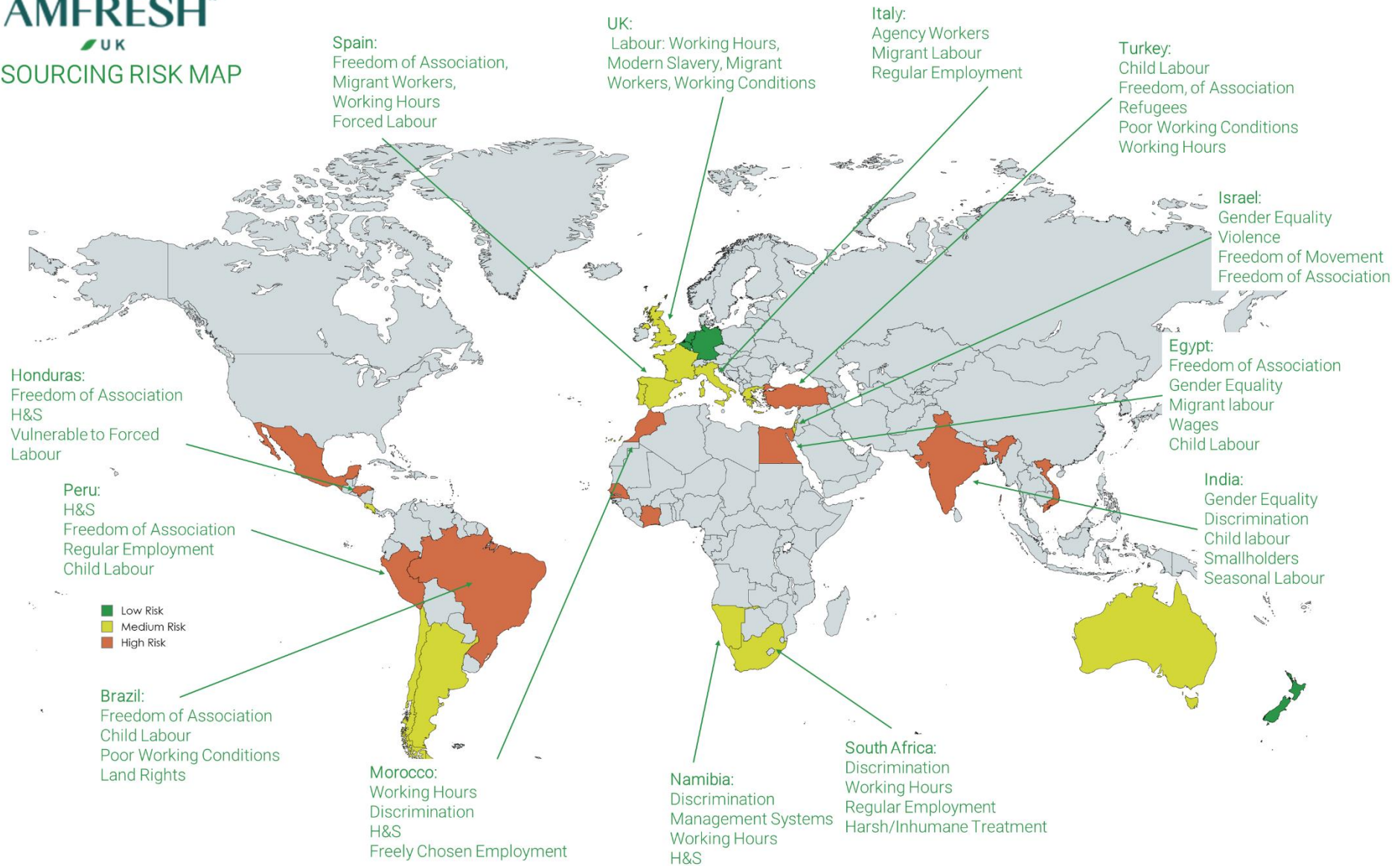
Between the last two occasions of completing the tool we took the following actions as a result:

- Rolled out action plans with our Tier One Suppliers in Spain.
- Mapped and risk-assessed our supply chain down to farm level, incorporating key risks such as forced labour, use of labour providers, labour standards and health and safety.
- Developed our worker committee through training with FNET.
- Reviewed training needs within the business relating to modern slavery.
- Provided training for Modern Slavery Champions.

By the next time we complete the tool we expect to have:

- Completed our remediation and response policy, while also developing remediation and response plans with our tier one suppliers.
- Mapped our service providers and risk-assessed them through SEDEX SAQ data.
- Supported supplying sites further on creating whistleblowing lines and establishing grievance mechanisms.
- Rolled out a policy to our supply chain and service providers on the Employer Pays Principle.
- Continued to work on exploring opportunities within the Stronger Together toolkits to strengthen our activities

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SOURCING RISK MAP



Appendix One: The Sourcing Risk Map for AMFRESH UK and AMT FRESH.