



Orchard House Foods

Modern Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Orchard House Foods Limited to prevent modern slavery in our business and supply chains.

Orchard House Foods has a zero-tolerance approach to modern slavery. We explicitly prohibit abuse, slavery, servitude, forced and compulsory labour, human trafficking and exploitation in our own businesses and our supply chains. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

Orchard House Foods is a market leader in prepared fruit, fresh fruit desserts and premium fresh squeezed fruit drinks. Our portfolio includes the brands Sun Ripe and Johnsons Juice.

Orchard House Foods employs over 1,000 people between our sites in Corby and Gateshead. We adhere to the Ethical Trading Initiative (ETI) Base Code and we encourage all our suppliers to adhere. As a business, we want to ensure that working conditions are safe and hygienic, child labour is not used, employment is freely chosen and workers are not required to lodge “deposits” or their identity papers with their employer, that they are free to leave their employer after reasonable notice, living wage is paid, working hours are controlled and that there is no discrimination or harsh | inhumane treatment.

Orchard House Foods is committed to responsible procurement. Our worldwide supply base provides us with thousands of raw materials, ingredients, packaging items and pieces of equipment. Orchard House Foods uses around 2,000 different fruit growers from 35 different countries, while ingredients and packaging supplies come mainly from within the UK and Europe.

Steps for the prevention of Modern Slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we have updated our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

The steps we have already taken include:

- i. We have conducted risk assessments to determine which parts of our business and which of our suppliers (raw materials | service providers | labour providers | contractors) are most at risk of modern slavery so that efforts can be focused on those areas;
- ii. We have engaged with key suppliers to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses or their supply chains;
- iii. We have introduced into our Supplier Code of Conduct principles around anti-modern slavery and policies to provide greater clarity;

- iv. We have written and implemented an internal company policy on preventing hidden labour exploitation;
- v. We have updated all our relevant policies and procedures, including our Whistleblowing Policy, to incorporate up-to-date information on current international labour standards and include consistent and clear tackling modern slavery clauses throughout all levels of the supply chain, these policies apply to all employees, casual workers, agency staff and suppliers;
- vi. We require all recruitment and employment agencies that we use (and that our suppliers use) to hold a GLAA (Gangmasters and Labour Abuse Authority) Licence and do thorough Right to Work checks prior to any offer of employment;
- vii. Training has been and continues to be provided to key management consisting of training via external partners and internal workshops; toolbox talks have taken place across the business raising awareness of all employees (including agency workers and security) and ensuring that people understand the importance of modern day slavery issues;
- viii. We have recently retrained our supplier compliance team on stronger together principles against modern slavery, which includes tools to use in tackling modern slavery in our supply chains, and we continue to attend ethical supply forums overseas with our fruit growers;
- ix. We have worked, and will continue to work, collaboratively with employees on a programme to identify, tackle and report hidden labour exploitation, raising awareness across our business;
- x. We have included recognising and reporting human trafficking, modern slavery and other third party hidden labour exploitation in our induction training for all employees, agency workers and site inductions for contractors |sub-contractors
- xi. The cost of the recruitment for Orchard House Foods is a business cost and no fee for recruitment is charged to workers, directly or indirectly.
- xii. We undertake regular desktop and physical audits of suppliers to ensure ethical practice.
- xiii. We have a confidential Whistleblowing process which references Modern Day Slavery and issue confidential staff engagement questionnaires. Modern Day Slavery posters and leaflets are displayed, regularly updated, and accessible to employees on all sites.
- xiv. We assess suppliers before engaging with them in business. Suppliers are required to produce copies of their accreditations. Suppliers are asked to complete a self-assessment ethical compliance questionnaire. This consists of questions around working hours, freedom of association, recruitment, accommodation, extended social accountability and health and safety - covering aspects of the Ethical Trading Initiative Base Code. SMETA (Sedex Member Ethical Trade Audits) are carried out on suppliers based upon their risk rating.
- xv. We are an A/B Member of Sedex and we now require all suppliers to become members of Sedex (thereby complying with the Ethical Trading Initiative Base Code) and to link to us on the Sedex platform so that we have visibility of their ethical status and can better understand compliance, development and risk from an ethical trading perspective. Where this is not in place we now require all suppliers to complete the self-assessment ethical compliance questionnaire;

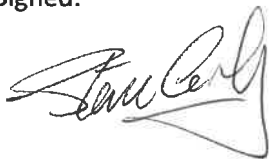
We intend to implement the following measures:

- i. Widen and review our risk assessment process to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- ii. Develop our depth of understanding of our supply chains and our suppliers' activities as they relate to ethical trade practices, forced labour and human trafficking;

- iii. Continue to engage with our suppliers to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses or their supply chains, supporting and guiding where required; where guidance is ignored and improvements continue to remain outstanding there is potential to sever the contract to supply
- iv. Continue to introduce contractual provisions in our contracts with our suppliers, obliging them to adhere to anti modern slavery principles and to accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion;
- v. Continue to require all suppliers to become members of Sedex and to link to us on the Sedex platform;
- vi. Actively and positively support our suppliers' efforts to build strong ethical trade and anti-slavery practices within their own operations, and encourage the development of the necessary resources to make these sustainable;
- vii. Continue to work collaboratively with our people and equip them with the necessary skills and resources to assess and recognise the risk of forced labour when forming business relationships and when interacting with our suppliers:
- viii. Continue to include recognising and reporting human trafficking and other third party hidden labour exploitation in induction training;
- ix. Continue to work in collaboration with our customers to further define common standards and assessments within our supply base that will actively promote a leading standard approach to ethical trade and worker welfare;
- x. Investigate sponsorship of overseas ethical forums to further enable a space to share best practices with our supplier base as well as other exporters and professionals. Orchard House Foods has a zero-tolerance approach to modern slavery and this will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

This statement has been put together as part of our commitment to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of directors of Orchard House Foods, who will review and update it annually.

Signed:



Steve Corby

CEO of Orchard House Foods

Date: January 2022

