

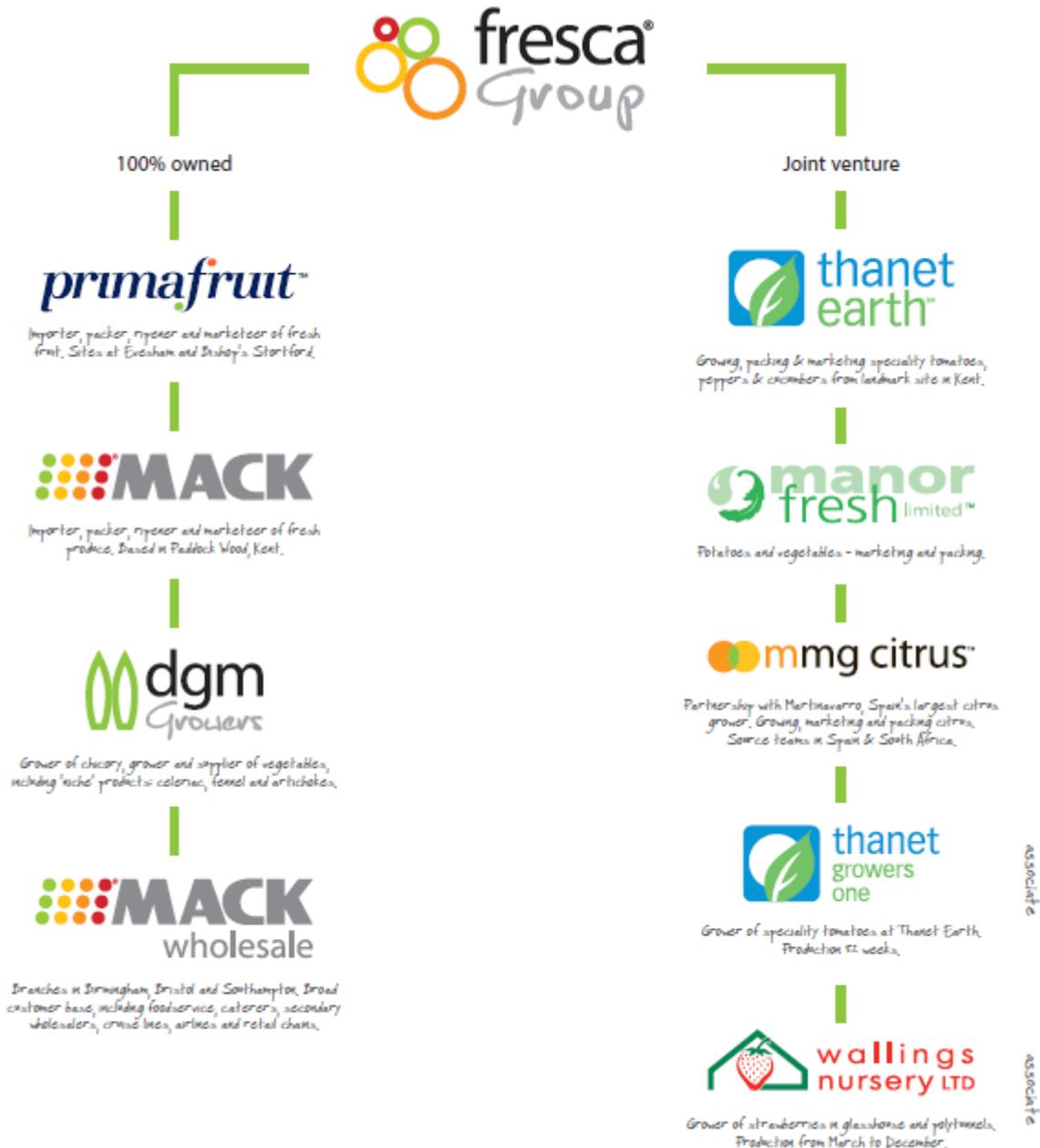
Modern Slavery and Ethical Trading Statement

September 2016 – August 2017



Organisational Structure

Fresca Group Ltd is a privately-owned company with a variety of holdings in the fresh produce industry. The business includes wholly-owned enterprises and a range of joint venture and associate businesses.



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Our Business

Our companies supply customers with fresh produce. Our customers are located primarily in the UK, and include multiple retailers, processors, foodservice operators, cruise lines, caterers and other fresh produce packers.

Our physical operations are primarily based in the United Kingdom, but products are sourced both within the UK and from international suppliers.

Our Supply Chain

The route to market for the products we sell is large and complex. Temporary and seasonal labour is a common feature in our supply chain, and one that we have identified as our largest risk for potential ethical issues. We seek to identify and rank this risk by area and to implement the mechanisms we consider necessary to provide assurance of good practice or to identify specific issues.

The very broad international nature of our business brings added complexity with considerations such as language, culture, legislation and economics all being significant influences in our supply chain. Standardisation of approach is not considered appropriate or feasible at this stage, but close relationships with recognised and respected bodies in the UK and internationally help provide support for upholding expected standards.

Business Policy and Practice

We are committed to reducing the risk of slavery and human trafficking within our own business and our supply chains. We recognise that characteristics of Modern Slavery crimes are hidden and we continue to develop our policies and systems to help identify potential abuse.

Each of our companies will identify its own risks and priorities and is responsible for monitoring and auditing as necessary. Monitoring is by KPIs specific to each business.

Some parts of our business are more advanced in their monitoring procedures and have key performance indicators in place. Review and continuous improvement of the control systems becomes the priority here. Others are working to map more effectively and to develop risk assessments, effective scorecards, training and measurement. We use our group structure to help drive best practice across all our companies.

Where a risk of abuse is identified a suitable action plan will be agreed and implemented, using respected third parties to monitor and support as appropriate.

Responsibility and Training

Each of the Fresca companies has a nominated lead Ethical Manager. Relevant training and professional development opportunities will be provided. Some training has been given to some colleagues and we are assessing the best strategy for compliance and awareness training to best meet the risks identified.

Where a Fresca Group company uses an employment agency then such contracts will be overseen by individuals trained in Gangmaster Licensing Authority requirements and procedures. There will also be regular reviews and audits.

New employees within a Fresca Group company are informed of their rights during an induction session.

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Every person working in a Fresca Group company (whether an employee, agency employee or contractor) is entitled to use the Fresca Feedback telephone line to report concerns. This service is publicised widely and frequently through the business.

I the undersigned take responsibility for this statement and represent the board of Fresca Group Ltd for overall responsibility for Ethical compliance.

<i>Name</i>	Ian Craig
<i>Position in Company</i>	Chief Executive
<i>Date of Signing</i>	26/9/16

