# ALCON LEGGER

# **Modern Slavery Act Statement - 2017**

#### Introduction

At Argent Foods Limited group, we are committed to operating our business in a transparent and responsible manner, striving to attain the highest ethical standards and respect for human rights. This includes reducing the risks of Modern Slavery throughout our business and our supply chain. Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude.

The respect and protection of human rights continues to be a core belief of Argent Foods Limited group and as such we do not accept any forms of forced, bonded, involuntary or child labour. We expect the businesses who work with us to follow these principles and will not knowingly work with those who do not.

In this statement we set out our activities which continue to support and demonstrate our commitment as stated above. The statement relates to activities undertaken during the financial year ending 31<sup>st</sup> December 2017.

#### **Organisational structure**

Argent Foods Limited group is a diversified international food group, with operations in Europe, Australasia and Africa. We focus on the processing, manufacture, supply and marketing of fresh fruit and produce, meat, poultry, and animal by-products.

We have an international workforce across our countries of operation spanning various disciplines including manufacturing, management, sales and other support functions. As a group, we pride ourselves on being a fair employer consistently operating in a manner that is respectful of our employees and compliant with relevant legislation. We take action to ensure that our own workforce is free from the risks of modern slavery through various activities and processes which include:

- Verification of the right to work in the UK prior to employment and periodic checks as required
- Awareness raising through inductions and throughout employment
- Supportive, transparent policies and procedures
- Zero tolerance to any form of human rights abuses including forced labour

## **Supply chains**

Our supply base is extensive and has a global reach. We have over 6,300 suppliers worldwide who we work closely with to mitigate the risks of Modern Slavery. Throughout 2017 our Strategic Steering Group continued its work to understand and mitigate the risks of Modern Slavery across the group and our supply chains. We focussed on concluding phase one of our action plan which included:

- Establishing the overarching principles for the group
- Developing the group policy
- Establishing the training blueprint
- Engagement and awareness raising for subsidiary MDs
- Establishing the governance structure













 Training key individuals in the subsidiaries to enable them to take accountability within their organisations

We then commenced phase two of our action plan by establishing the operational SME (Subject Matter Expert) groups within the subsidiary originations. The role of the SME group is to implement the policies and blueprint procedures in a manner that is fit for their individual subsidiary.

As the SME's become established in the subsidiaries, more targeted activities will continue.

## **Culture of openness**

As we have previously asserted, we believe that open communication is vital to reduce the risk of any exploitation of our people. As such we encourage an open culture with all our stakeholders. We encourage all our employees, customers and other partners to report any concerns related to our direct activities or those of our supply chains. This includes any circumstances that may give rise to an enhanced risk of modern slavery. Our *Policy on whistleblowing* is designed to support our open culture and to make it easy for employees to make any disclosures without fear of retribution. To further support our commitment in this area, we have introduced a workers hotline within our global berry businesses. In addition to this we have an active Employee Assistance Programme which includes confidential helplines, which are staffed with knowledgeable call handlers, who can either offer support on the phone, or direct employees to the right support appropriately and confidentially.

We continually review all of our business and people policies to further cement our commitment in this area, making our stance, processes and support clear and visible to all stakeholders.

# **External partnerships**

In 2017 we continued to develop our relationships with external industry, national and global bodies with a strong focus on the prevention of Modern Slavery. We recognise that Modern Slavery is a global issue and the insights, support, training and learnings from external bodies continue to be valuable to us. Our key external partners were the following organisations:

- Stronger Together
- The Gangmasters and Labour Abuse Authority (GLAA)
- The Association of Labour Providers (ALP)
- Food Network for Ethical Trade
- The Produce Ethical Network
- The Ethical Trading Initiative and Oxfam
- The Good recruitment campaign

We will continue to partner with external bodies and will seek to partner with agencies which specialise in supporting victims of Modern Slavery.

#### **Due diligence**

We continually review and evolve our supply chain due diligence systems to ensure that we are working effectively to identify, assess and then mitigate any areas of risks. Our supply chain includes organisations from whom we source:













- Our direct products (fruit/meat)
- Product related items (packaging)
- Employees (recruitment agencies and labour providers)
- Logistics services (freight)
- Cleaning services
- General consumables
- Utilities

Prior to engaging a new supplier we evaluate their ethical principles and seek assurances regarding their commitments to protecting human rights. In addition to this we are members of supplier information databases (i.e. SEDEX and QUADEX) which allows for complete transparency when analysing our suppliers. The tools also feed into our risk mapping, working with and supporting our suppliers to reach the required standards.

Furthermore, we require that any agencies that are used to source labour are registered and certified with the GLAA and have a demonstrable commitment to mitigating the risks of Modern Slavery.

## **Awareness raising and Training**

In 2016 our focus centered around upskilling key individuals across the group on the risks of modern slavery. Our work included structuring the workforce in terms of skills knowledge requirements and building a training map to support this. In 2017, we continued in the execution of this plan, training more individuals within the subsidiaries to enable them to set up and effectively manage their SME groups.

Awareness continues to be raised through posters and visual prompts in our employee areas, particularly targeting high risk areas such as factories.

#### **Board Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2017. This statement has been approved by the board of directors, who will review and update it annually.

CEO's signature: Name: David Gray Date: June 2018

This is the parent company statement and we are adhering to this at this subsidiary.











