

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in the UK and constitutes Keelings Retail slavery and human trafficking statement for the financial year ending 2016.

Organisational structure

We are 100% family Irish-owned business, focused on growing, sourcing, selling and distributing fresh produce and produce to the horticultural and grocery sector.

Keelings Retail is a division of the Keelings Group. Within Keelings Retail, there are a number of business units, encompassing a farming division, retail trade division and a flowers division. Keelings Retail employ over 1500 employees in the Republic of Ireland.

Our supply chains

Keelings Retail work with over 1900 growers globally to supply fresh produce and flowers to the Irish retail sector. We source our produce from over 46 countries globally.

We have mapped out our supply chains for Africa, Asia, Central and Latin America, North America, Europe and New Zealand.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we will put in place a designated Modern Slavery and Human Trafficking Policy to support our existing Ethical Trading Policy which is aligned to the ETI Base Code.

Our Modern Slavery and Human Trafficking Policy demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we conduct risk assessments of our supply chains and our agency labour providers. We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Drive best practice in tackling modern slavery and human trafficking.
- Protect whistle blowers, with a separate whistle blowing policy.

Supplier adherence to our values

We encourage and expect our suppliers and labour providers to comply with best practice in tackling modern slavery and human trafficking. Keelings will guide, advice and support our suppliers and labour providers where necessary to address instances where they do occur.

Prior to working with any labour provider or supplier, the company conducts a comprehensive due diligence exercise to ensure that legal and company standards can be met. Following a self-assessment, we will conduct a risk assessment to evaluate labour and human rights performance of our suppliers, in line with the Ethical Trading Initiative (ETI) Base Code. This will ensure all those in our supply chain and contractors comply with our values.

We have identified dedicated personnel from across key departments dedicated to ensuring compliance, which consists of representatives from the following departments:

- Technical
- Procurement
- Operations
- Human resources

The compliance team is led the Compliance manager.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided training to our staff and labour providers on the Modern Slavery Act, as well as Labour and Human Rights Remediation based on the ETI Base Code. We would expect our business partners to ensure those responsible within their organisations are aware of their responsibilities address modern slavery.

Our effectiveness in combating slavery and human trafficking

We will review our key performance indicators (KPIs) to ensure that we are measuring how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Review and amend presentations at assessment centre and induction stage to include information on modern slavery and human trafficking. Including information on where individuals can go for further support.
- Request that our labour providers provide us with a statement of intent on modern slavery and human trafficking.

DAVID KEELING

DATE

MANAGING DIRECTOR

KEELINGS RETAIL

Amendment Record Sheet		
Date	Revised Issue Details	Revised by

