

Introduction :

Keelings Group Modern Slavery Statement

This is the second Modern Slavery Statement published by Keelings and is published in accordance with the Modern Slavery Act 2015.

Modern Slavery is a term which encompasses slavery, servitude and forced or compulsory labour. Human trafficking is defined as arranging or facilitating the travel of another person with a view to that person being exploited.

This statement sets out the steps that Keelings Group has taken during the financial year 2016-2017 to ensure that modern slavery and human trafficking is not occurring in our organisation or in our supply chains. This statement shall be reviewed annually in line with the business financial year.

The Business and Supply Chains

We are a family owned business, focused on growing, sourcing, selling and distributing fresh produce. The company has a number of separate business units which employs over 1800 people across its manufacturing and head office sites in the UK, Ireland and France.¹

Keelings Group is a packer, importer and supplier of horticultural products to the retail sector in the UK, Ireland and the EU. Keelings Retail grows fruit in Ireland but we also source fruits, vegetables and flowers in 46 countries globally. Within the Group there is also a separate business unit that provides software solutions to the food/agriculture sectors.

Keelings Values

The values of our business are based on four core principles; People Matter, Integrity, Team Work and a Passion for Achievement. These values underpin everything we do. Keelings Group are committed to eradicate Modern Slavery and supporting the businesses within our supply chain to ensure their practices are ethical and in line with our business values.

Our Internal Policies

We expect our suppliers and labour providers to comply with best practice in tackling modern slavery and human trafficking. To this end we have developed a number of specific policies which address labour and human rights, promote good business practice and establish confidential channels of communication for employees and suppliers to raise any concerns. These policies include:

¹ In the United Kingdom, France and the Republic of Ireland, employing over 1572 (1448 Ireland and 124UK) direct members of staff and 265 people as (225 Ireland and 40 UK) agency staff.

- **Grievance Policy**
- **Equal Opportunities Policy**
- **Ethical Trading Policy**
- **Bullying & Harassment Policy**
- **Whistleblowing Policy**

In addition to our internal policies, Keelings Group applies the Ethical Trading Initiative (ETI) Base Code as a core standard for its company operations and its supply chains. All Tier 1 and Tier 2 suppliers have been issued with an ‘Ethical Responsibility Policy’ and are required to comply with both local legislation and the ETI Base Code as a minimum requirement.

We will not tolerate the abuse of human rights within any part of our business or our supply chains. To this end we operate a whistleblowing policy aimed principally at our employees. Keelings subscribe to an independent hotline, which is clearly communicated to all employees during their induction process. This is to encourage workers to report any concerns about human rights violations or any other wrong doings within the business. Any such reports will be taken extremely seriously and thoroughly investigated.

Due Diligence

Almost 15% of our staff across our sites outside of Ireland are agency workers, who are employed for seasonal work and short term cover. Within Ireland up to 30% of our staff are agency workers who can also be engaged with the business for longer periods of time. As part of our initiative to identify and mitigate the risk of modern slavery occurring within our own direct operations, we conduct our own internal risk assessments of labour providers to ensure that workers have all the legal rights and benefits to which they are entitled and that they are treated with respect. Our UK labour providers undergo a SMETA audit against the ETI base code and are licensed under the Gangmasters Labour Abuse Authority (GLAA). Whilst this is not a legislative requirement in ROI, we do require all labour provider to operate to ETI base code standards.

Risk assessments and SMETA audits are an integral part of our overall supplier management system. They are the tools we use to identify risks, compliance gaps and to help us identify where action is needed whether immediate, short or long term. To that end:

90% of our suppliers are registered on SEDEX and have completed a Self-Assessment questionnaire

848 of our suppliers are listed on SEDEX, of these 205 in the last 2 years have received a SMETA audit.

Additionally, our technical team has a rolling monitoring programme to check food safety and worker welfare with 1st tier suppliers. During the visits, the technical team will review any issues raised in previous SMETA audits.

Risk Assessments

We establish the risk profile of Tier 1 and Tier 2 suppliers using industry wide frameworks. On the one hand, suppliers are Risk Assessed using the SEDEX Risk Assessment Maplecroft

tool which considers country of origin and highlights key of areas of concern on labour and human rights.

On the other hand, Keelings uses a risk assessment developed by the Food Network for Ethical Trade FNET. This network was launched in 2017 with the goal of establishing a common approach to managing ethical trade in food supply chains, responding to the requirements of the Modern Slavery Act and in line with the UNGPs. We use FNET topline ethical trade risk assessment tool and supplier guidance for managing ethical trade risks within our supply chains. Based on this country risk assessment, Keelings will request that growers conduct a SMETA audit and schedule supplier technical visits to respond to level of risks.

Training and Capacity Building

Our employees and suppliers play a crucial role in helping us to ensure that modern slavery is not taking place in our business and in our supply chains. Over the last 3 years we have delivered various training activities to raise awareness of modern slavery and inform our employees about the issue. These include:

- Modern Slavery, Labour and Human Rights Training delivered over 20 senior staff members in our Technical and Human Resource Departments.
- Attendance and participation in Stronger Together Workshops.
- Awareness training using Stronger Together tools for existing workers during the induction process. In particular, using the Stronger Together Campaign Video and communicating helpline numbers.
- Improvement in induction training to include Modern Slavery Awareness.

Industry Collaboration

Keelings International are members of the Fresh Produce Consortium, Supplier Ethical Data Exchange (SEDEX). Industry updates and Horizon scanning is engaged in through both engagement in the industry and our customers updates and forums.

Reviewed and approved by Technical Director :

Date:.....



Amendment Record Sheet			
Date	Revised Issue Details	Revised by	Revision No
July 2016	Original issue	Catriona Gregory	01
22 nd January 2018	Update	Des Ferris	02