



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **INTRODUCTION FROM THE MANAGING DIRECTOR**

Peter Gilding & Co Ltd and its' subsidiaries are fully committed to the UK Modern Slavery Act 2015.

Slavery and human trafficking remains a hidden blight on our global society. We understand that we all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Employees are expected to report concerns and management are expected to act upon any information received.

### **ORGANISATION'S STRUCTURE**

Peter Gilding & Co Ltd imports fresh produce from around the world, supplying wholesalers and retailers. The Company has facilities, utilising its' subsidiaries, to pack produce into various formats to meet customer demands.

### **OUR BUSINESS**

Our business is family owned, independent and autonomous, with the normal shareholder oversight and direction. It operates out of its' single site based on the Knowsley Business Park on the outskirts of Liverpool in the United Kingdom.

The Company employs a core staff of 180 people with additional temporary staff, as and when required, sourced from local recruitment agencies who are constantly vetted and audited annually. All our colleagues are paid the living wage or more.

The Company has two main departments being the wholesale market and the retail market:

- Wholesale Market department sells produce to the wholesale markets in the UK.
- The Retail department has the ability to pack into a variety of formats required by retailers matching specifications set from season to season.

In addition, the Company provides storage and distribution facilities, subject to seasonal availability of space within its' large temperature-controlled warehouses.

### **OUR SUPPLY CHAINS**

Our produce is sourced from over 20 countries around the world and follows the seasonal harvest in both the Northern and Southern hemispheres. The majority of produce is sourced directly from growers, but, when demand requires, we may also purchase from agents to maintain supplies to our customers.

The approved supplier list is maintained in accordance with the BRC Standard and is primarily controlled by a supplier assessment questionnaire (SAQ) which is completed every 3 years.

Suppliers who are working towards a quality accreditation e.g. Global Gap, BRC or IFS may be provisionally approved pending a successful audit outcome.

Deliveries are monitored for compliance over an initial period before full approval is granted.

Once approved, suppliers are continuously monitored and annual requests made for quality and ethical credentials along with proposed pesticide usage plans and pesticide analysis results.

Other raw materials, goods and services are sourced from internally approved suppliers who hold industry recognised GFSI accreditations and certificates.

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### **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. Our Sedex self-audit and Ethical Trading Base Code compliance reflects 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 -

- Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, we ask these entities to sign an agreement with us confirming that they have suitable anti-slavery and human trafficking policies and processes in place and comply with the Modern Slavery Act. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain as it is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

### **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and our contractors to comply with our values.

The Directors are responsible for compliance in their respective departments and for their supplier relationships.

### **RECRUITMENT**

Our recruitment practices ensure that as a business we undertake pre-employment checks on all employees prior to them joining us to confirm their legal identity and right to work in the UK.

We aim to reduce the risk of any modern slavery and human trafficking further by working with approved Third-Party recruitment providers for temporary staff when required to fulfil increases in customer orders. Each approved provider is a member of the Stronger2gether initiative and confirm all employees provided have completed legal identity and right to work checks prior to arriving on site.

### **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 ensure the relevant members of staff are aware of, understand, and agree to, our Value Statement and Modern Slavery and Human Trafficking Policy. All Directors have been briefed on the subject.

This also includes highlighting whistle bower and helpline numbers where vulnerable people may obtain help anonymously through Gangmasters Licensing Authority, Modern Slavery helpline, Migrant Help or Salvation Army.

### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following key performance indicators (KPI's) to measure 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:

- Completion of Quality Compliance systems.

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- Signed agreements from our suppliers and hauliers ensuring compliance with our expectations in regards to modern slavery and human trafficking.
- Use of labour monitoring and payroll systems; and
- Communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the current financial year.

### Objectives 2017/18

- Become a member of Stronger Together initiative. **Completed.**
- Nominated senior member of staff to attend awareness training course with Stronger Together. **Completed.**
- Raise awareness through posters and visual prompts in our communal staff areas. **Completed.**
- Train all operations staff to recognise areas of the workforce that may be at risk, signs to look for and actions to be taken if they suspect people are being exploited. **Completed.**
- New staff induction to include anti-slavery and human trafficking briefing. **Completed.**

### Objectives 2019/20

- All administrative staff to complete Modern Slavery and Human Trafficking awareness training. **Completed.**
- Main suppliers to renew commitment to Modern Slavery and Human Trafficking policy. **Ongoing.**
- Roll out to main transport companies that provide logistics. **Ongoing.**
- Audit employment agencies used for temporary workers. **Ongoing.**

### Objectives 2020/21

- All pack house staff that joined the Peter Gilding Group in March 2019, to complete Modern Slavery and Human Trafficking awareness training. **Completed.**
- Main suppliers to renew commitment to Peter Gilding & Co Ltd Modern Slavery and Human Trafficking Policy. **Ongoing.**
- Main Transport companies that provide logistics to confirm commitment to Modern Slavery and Human Trafficking Policy. **Ongoing.**
- Audit employment agencies used for temporary workers. **Completed**
- Renew or update on-site posters. **Completed**

### Objectives 2021/22

- Main suppliers to renew commitment to Peter Gilding & Co Ltd Modern Slavery and Human Trafficking Policy. **Ongoing**
- Main Transport companies that provide logistics to confirm commitment to Modern Slavery and Human Trafficking Policy. **Ongoing**
- Audit employment agencies used for temporary workers. **Completed**
- Refresh right to work in UK status for staff. **Completed**



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### Objectives 2022/23

- Refresher training for all PGCL operations staff to recognise areas of the workforce that may be at risk, signs to look for and actions to be taken if they suspect people are being exploited.
- Main suppliers to renew commitment to Peter Gilding & Co Ltd Modern Slavery and Human Trafficking Policy.
- Main Transport companies that provide logistics to confirm commitment to Modern Slavery and Human Trafficking Policy.
- Refresh or update on-site Stronger2gether posters.
- Audit employment agencies used for temporary workers.

Andrew Gilding  
**Managing Director**