

## **Modern Slavery Act Transparency Statement**

EC Drummond Group commits to developing and adopting a proactive approach to tackling hidden labour exploitation. Hidden labour exploitation is the exploitation of job applicants and workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of the management structure. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that forced labour is often well hidden by the perpetrators, with victims, if they perceive this of themselves, being reluctant to come forward.

### **Our business**

EC Drummond Group are involved with the growing, processing, packing and marketing of a range of arable, soft fruit, top fruit and poultry with a quality and freshness that is second to none. Our customers include major supermarkets across the UK and the wholesale market.

Since being established in 1956 by Eric Drummond, the family business has grown to employ over 95 full time employees and 300 seasonal workers.

### **Our supply chains**

We source our wide range of products from across the UK from many suppliers. However, we are committed to implementing and enforcing effective systems and controls to prevent modern slavery and human trafficking throughout of supply chain.

EC Drummond Group has an Ethical Purchasing policy that details our expectations of our suppliers and in addition, we would expect our suppliers to risk assess their suppliers against modern slavery and forced labour issues.

### **Our commitment to combating modern slavery**

We ensure that our labour providers have a Gangmasters and Labour Abuse Authority (GLAA) licence and follow the provisions of the Gangmasters (Licencing) Act 2004 and the Immigration Act 2016 and accordingly adhere to their standards.

The standards are legal requirements to protect workers from poor treatment and exploitation. They cover issues such as working hours, training, terms and conditions, the national minimum wage and transport to ensure labour providers meet the basic safety and welfare standards. There are also conditions attached to the licence holder and Principle Authority to check if they are "fit and proper" to hold a licence.

EC Drummond Group have also adopted the Ethical Trading Initiative (ETI) Base code of Labour Practice, which is based on standards of the International Labour Organisation (ILO). The ETI is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. Companies with a commitment to ethical trade adapt a code of labour practice that they expect all their suppliers to work towards. Such codes address issues like wages, hours of work, health and safety and the right to join free trade unions.

We also subscribe to Stronger Together, a multi-stakeholder initiative which aims to reduce modern slavery, particularly hidden forced labour, labour trafficking and other third-party exploitation of



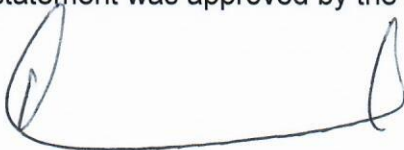
workers. Stronger Together provides guidance, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.

Our policies on Ethical Trading and Human Rights set out our commitment combating modern slavery.

EC Drummond Group shall:

1. Designate appropriate managers to receive any necessary training to identify potential labour exploitation and have a responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. The Group will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that labour resourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
4. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licencing and Abuse Authority or police.
5. Provide information on tackling "Hidden Labour Exploitation" to our workforce through workplace posters, worker leaflets and induction.
6. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and act on reports appropriately.
7. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities via the GLAA.
8. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.
9. Carry out worker interviews at least once a year and on an ad-hoc basis to assist in identifying concerns.

This statement was approved by the Board of Directors, October 2019

A handwritten signature in black ink, appearing to read 'Ben Drummond', written over a horizontal line.

Ben Drummond  
Director