



Dame Sara Thornton DBE QPM
Independent Anti-Slavery Commissioner
5th Floor, Globe House
89 Eccleston Square
London, SW1V 1PN

16th December 2020

Dear Dame Sara,

Firstly, I would like to acknowledge the value of the role of Independent Anti-Slavery Commissioner to the Fresh Produce sector. You and your department have brought a tremendous amount of energy and are a recognised driving force in promoting good practices in the quest to end Modern Slavery.

Operation Fort has had a marked effect in our industry, raising the awareness and commitment levels significantly, and increasing collaboration between the key stakeholders concerned. The Modern Slavery conference hosted by G's in January 2020 and the subsequent development of the Modern Slavery Intelligence Network represents a milestone in this regard.

I fully acknowledge that challenging times still lay ahead, with unrepresented levels of uncertainty due to COVID-19 and the fast-approaching end of the transition period (Brexit), we know that we must remain vigilant. It is highly likely that criminal organisations are ready to take advantage of this situation to perpetuate their deplorable practices, and we know that we must be prepared for that.

I read your Operation Fort review with interest and appreciated the precise description of the depth and implications of the case, as well as of the state of play in the industry's efforts against Modern Slavery. The IASC Maturity Framework will help us all define our roadmap in order to improve our Modern Slavery management systems.

If I may, I would like to bring to your attention that those businesses with more mature systems could struggle to fully identify themselves in one of the different categories, as they might have developed specific expertise in various areas. My Ethics team found that to be case as we see ourselves as conforming with *most* of the criteria corresponding to the "Evolving Good Practice" category, but also conforming with the majority of the elements for "Leading Innovation on Human Rights" category.

Our business model, which is based predominantly on producing our products directly, instead of outsourcing large parts of our supply chains, amplifies the social value of our operations, however it creates higher direct exposure to some of the Modern Slavery risks inherent in our sector. This has led us to develop specific expertise in all areas related to the direct management of our workforce, prioritising our own operations, which represent the great majority of the company's turnover. The use of risk assessment analytics and innovative worker engagement tools are also essential elements of our Human Rights programme and have proven their importance. Although this is an area we will continue to develop.

We believe that the short-term future involves a wider endorsement of the UN Guiding Principles, in particular by SMEs. In this regard, we are planning to launch our new Human Rights Policy, which will constitute a broader

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and more dynamic framework to fight Modern Slavery, as well as other social risks that could be present in our supply chains.

The wider implementation of the UN framework will promote more mature conversations within the industry around the risks we face and will enable mine and other organisations to develop management procedures accordingly.

I look forward to continuing working together throughout 2021 in tackling Modern Slavery.

Yours sincerely,

John Shropshire OBE
Chairman, G's Freshly

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