

# **PDM Produce (UK) Ltd – Modern Slavery Statement**

This statement is made on behalf of the Directors of PDM Produce (UK) Ltd in respect of the Modern Slavery Act 2015. This act requires us to publicly declare what efforts have been made within our own business and that of our supply chain to eradicate slavery and human trafficking.

In accordance with the Act, our statement articulates our policies and practices around recognising and preventing human trafficking and slavery, the key areas of risk to us and the measures put in place to address this risks.

## **Organisational Structure**

PDM has been growing fresh produce in the UK for more than 30 years, supplying many of the UK's leading retailers and specialist outlets. We provide quality, fresh products, both whole head lettuce and celery as well as bagged baby leaf salads for UK and Irish consumers.

Our first packing facility was built in 1998 enabling us to respond quickly to the demand of 'pick to plate' set by our consumers, at the time making us one of the UK's only grower / packers of these products. Our first wash line for spinach and baby leaf products was added in 2006 and by 2012 we had a full wash and ready to eat packing facility.

As growers of a seasonal product we harvest what we can during the usual British season (typically May to October), using fields within a 25 mile radius of the farm. During the winter months we supply product from our own facility in Spain as well as from trusted partners in Southern Europe.

Due to the seasonality of our industry our employee numbers vary for winter and summer seasons. We have around 300 permanent employees during the winter months and then recruit significantly from outside the UK for our summer months for harvesting personnel, taking our total employee numbers to over 700.

## **Our Policies**

PDM has an Ethical Policy, Whistleblowing Policy, Human Rights Policy and Grievance Policy all of which can be used to address any concerns of slavery and/or human trafficking within our business.

Our recruitment practices are robust with all permanent employees recruited by us. Many of our seasonal staff return to PDM year after year and we work with two of the licenced Seasonal Worker Scheme providers to recruit other seasonal staff, paying a fee directly to them. Where local agency workers are required for temporary cover these are supplied to us by an established local UK provider on a daily or weekly assignment basis. If an assignment is expected to last more than 12 weeks then we aim to offer the worker the opportunity to join us as a permanent employee. We currently utilise one UK recruitment agency for temporary cover. Any agencies used by PDM are audited at least once per year.

Contracts are signed with all labour providers and UK recruitment agencies before the commencement of any supply. If additional resources are required then we will ensure agents comply with the GLAA, ETI base code and our Ethical Policy.

We provide supplier packs to all our raw material suppliers and request that they are members of Global Gap as a minimum or are members of Sedex and undertake a SMETA audit.

## **Training**

Most of our Managers have received training in modern slavery issues through the 'Stronger Together' programme and key members of the HR team have received training in the 'Responsible Recruitment' Toolkit. The local UK recruitment Agency also train key members of staff in the 'Stronger Together' programme.

PDM are members of the Association of Labour Providers (ALP) and regularly participate in their training and briefings.

Through our Induction Programme, we educate all employees on the risks of Modern Slavery and provide information to all employees about how to raise concerns via the GLAA or through our Whistleblowing Policy.

Our Technical Director and others within the Technical Team have undertaken Lead Auditor training which is utilised when visiting our raw material suppliers.

The Director of People and others from the HR Team regularly attend employment law updates, ethical trade conferences and customer ethical meetings in addition to awareness events held by GLAA, ALP and many of our customers.

We encourage our supply chain colleagues to attend Stronger Together training and Ethical Trade forums which are available within their own countries in order to help them identify and report any potential breaches of our Ethical Policy.

## **Due Diligence**

PDM is a member of the Supplier Ethical Data Exchange (SEDEX) and we are regularly audited by third parties who publish the results making them visible to our customers.

We are also signed up to the Gangmasters and Labour Abuse Authority (GLAA) Active Check Database which will inform us of any changes related to the Labour Providers we use.

We insist that all labour providers have current GLAA licences and that they follow the provisions of the Gangmasters Licencing Act 2004 adhering to all their standards protecting workers from poor treatment and exploitation. We emphasise that no-one should pay for their work placement.

Identification and right to work checks are carried out at induction and verified for all employees to ensure they are not in possession of fraudulent documents and that they have their original ID cards / passports with them. This also confirms the age of the employee making sure that we avoid any risk of employing individuals under the age of 18.

Wages are paid into a 'pre-payment card' which is unique to each employee and is provided through us by our banking provider.

All our raw material suppliers have received PDM due diligence supplier packs. We recommend all our suppliers are, as a minimum, Global GRASP certified or, ideally, SMETA certified. We will challenge our raw material suppliers each year to move from Global GRASP to SMETA and we will work with them to help them do so.

Our raw material suppliers have signed up to the Ethical Trade Initiative (ETI) Base Code. PDM will work with all suppliers to limit risks within their own business and supply chain. We will not maintain business relationships with any suppliers that have refused assistance or have intentionally breached the human rights of their employees or colleagues. All new or potential suppliers will undergo due diligence assessment as part of the tender or negotiation process.

We have generated an ethical pack for our packaging and transport suppliers.

## **Areas of Risk**

Our business and supply chain providers can be divided into 5 areas:

- Labour
- Raw Materials
- Packaging
- Transport
- Indirect Consumables e.g. stationery, tools, fuel etc

### **Labour & Raw Materials**

Candidate availability, english skills and work experience has decreased since Brexit and since 2020 we use labour from two of the Licenced Providers of the SWS scheme for many of our seasonal workers.

In our winter supply chain, risk comes from the recruitment and treatment of suppliers own staff or labour provided employees.

### **Packaging**

Our packaging suppliers are predominantly UK based with 1 supplier in Spain who is utilised on a low level / low volume basis.

### **Transport**

Our Transport suppliers used to deliver from Farm to customer are all UK basis except for export to Ireland which is via an Irish Transport company.

Since 2021 we have contracted directly with Spanish and Italian hauliers to collect and deliver raw material to us at PDM.

### **Indirect Consumables**

Where possible we purchase or indirect consumables from local UK based businesses.

## **Performance Indicators**

PDM is not aware of anyone within our supply chain being identified as having an incident of modern slavery or human trafficking. We have not received any human rights related grievances in relation to our business or those within our supply chain.

We aim to follow a number of key performance indicators to measure how effective we have been in ensuring slavery and human trafficking practices are not taking place in any part of our business or supply chains. These KPI's are:

- Ensure all raw material suppliers and labour providers have been issued with and returned their appropriate supplier pack
- Work with any high risk suppliers to reduce their risk to a medium level
- Work with any medium risk suppliers to reduce their risk to a low level
- For all existing raw material, transport and packing suppliers and labour providers with a headcount of 100+ to be members of Sedex
- For all of our raw material suppliers to have had a Global GRASP assessment or a SMETA audit.
- For a member of each product supplier to attend a local Ethical Trader Seminar
- To continue to expand employee awareness of modern slavery and human trafficking through recruitment and induction processes and up to date communications

## **Monitoring and Auditing**

As members of SEDEX we are regularly audited with the results visible to all our customers.

We currently conduct our own technical visits on our raw material suppliers on a quality basis and have introduced an element of ethical questioning to enable us to consider risks. We monitor our suppliers using the SEDEX risk assessment tool and actively engage with them on how to improve their risk ratings.

We will physically audit any high risk suppliers once every year and only reduce the risk rating once evidence of the risk has decreased.

## **Actions**

We understand that industries who do not predominantly supply fresh produce may not be aware of modern slavery and trafficking within their own supply chain. We will work with all our suppliers to ensure that they are aware of the risks, of their legal obligations and the whistleblowing processes they should follow should any issues be found within their business and or supply chains.

Any findings which indicate potential slavery or trafficking (or other serious ethical issues within the supply chain) will result in an open and honest dialogue between us, our supplier and our customers and a thorough investigation with suitable action plan.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes PDM's Slavery and Human Trafficking Statement.

Approved and signed by Phillip Maddocks, CEO