

Modern Slavery Statement

2025



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CEO Statement

At PDM Produce, we are proud to be a family-owned business rooted in the heart of Shropshire, with a heritage spanning three generations of farming.

Having grown this business from the ground up with family at its heart, and as a third-generation farmer, I am deeply committed to the values that have shaped our business from the very beginning—integrity, respect, and a strong sense of responsibility to our people, our partners, and our community.

Our family values are at the core of everything we do. Whether working with our dedicated employees, trusted contractors, or valued seasonal and temporary colleagues, we believe in fostering a culture of fairness, equality, and mutual respect. These principles extend to the close relationships we maintain with our customers and suppliers, built on collaboration and shared responsibility.

We recognise that modern slavery has no place in our industry or society. Sadly, the reality of modern slavery and human trafficking remains a persistent threat, both within the UK and throughout the complex layers of our European supply chains. These exploitative practices often thrive in the shadows, preying on vulnerability. Furthermore, recent turbulent global crises, from geopolitical conflicts to economic instability, have unfortunately exacerbated these risks, creating increased opportunities for modern slavery to occur, particularly within the UK produce industry where reliance on seasonal labour can be high.

That's why we are committed to working together — with our wider team, our partners, and the wider fresh produce sector—to actively disrupt exploitative practices and create a safer, more transparent environment for all. Our goal is to ensure that everyone who contributes to our business, directly or indirectly, is treated with dignity and respect.



To reinforce this commitment, the last year has seen us dedicate significant time and resources to strengthening our collaborative efforts. We have worked extensively, engaging with both customers and suppliers across Europe, to enhance transparency, share best practices, and collectively identify and mitigate risks within our shared supply chains. Building on this foundation, throughout 2025, we will be further strengthening our internal processes and due diligence to enhance our ability to detect, prevent, and respond to any potential instances of modern slavery within our operations. This ongoing dialogue, partnership, and internal vigilance are crucial in building the resilience needed to combat modern slavery effectively.

By standing together, we can protect the rights of our current wider team, support the wellbeing of their families and communities, and safeguard the future of our industry for generations to come.

At PDM Produce (UK) Ltd, we are passionate about natural nutritious, delicious, and sustainable fresh food that benefits both people and the planet. This commitment extends beyond our fields and into the heart of our operations, where we prioritize the well-being and protection of everyone involved in our supply chain.

This statement, made on behalf of the Directors of PDM Produce (UK) Ltd, reaffirms our dedication to eradicating slavery and human trafficking. In accordance with the Modern Slavery Act 2015, we outline our policies, procedures, and the proactive steps we take to identify and mitigate risks within our business and supply chain.

Philip Maddocks, CEO

Our People

At PDM, we are deeply committed to the wellbeing of our employees and colleagues. As more than just a family business—PDM is family—we place open dialogue and mutual respect at the core of our decision-making. This culture of care and connection underpins our approach to ethical practices and responsible business conduct.

In 2024, we introduced our 'Help Us Help You' survey to further strengthen our culture of listening and inclusion. This initiative is designed to give every colleague a voice—capturing their thoughts, feelings, and suggestions—so we can continue to evolve as a workplace where everyone feels safe, respected, and valued. The insights we gain help shape our policies and practices, reinforcing our commitment to transparency, fairness, and continuous improvement.

Also over the past year, we developed our People Strategy with our employees at the heart of everything we do.

This strategy focuses on key pillars including wellbeing, training & development, worker voice, business culture whilst raising awareness of wider exploitation risks. It reflects our proactive approach to creating a safe, supportive, and empowering environment for all, and strengthens our ability to identify and prevent modern slavery and unethical practices across our operations and supply chains.

We recognise that the fight against modern slavery is ongoing and requires vigilance, transparency, and continuous improvement. At PDM, we remain steadfast in our commitment to fostering a culture where people are protected, heard, and empowered. Through our values, strategies, and actions, we will continue to build a workplace and supply chain that reflect our belief that everyone deserves to be treated with dignity, fairness, and respect.



Our Business

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.

We are split into the following:

- PDM Produce (UK) Ltd
- PDM Espana Salads S.L

Our first packing facility was built in the early 90's, enabling us to respond quickly to the 'pick to plate' demand set by our consumers. At the time, this made 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. In 2020 we set up PDM Espana Salads S.L to allow us to have a growing operation in Spain to support our business here in the UK.

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 products from our own facility in based in Seville Spain as well as from other partners in Southern Europe.

Due to the seasonality of our industry, our colleague numbers vary between winter and summer seasons across both PDM Produce (UK) Ltd and PDM Espana. Across both business we have 632 employees. This is calculated by averaging the headcount of weekly paid people across a month + monthly paid headcount. The average for the year is then calculated by averaging all of the monthly headcounts.

Our colleagues originate from across the world



We are currently supplying a mix of Washed and Ready to Eat (WRTE) bagged salads, WRTE salad bowls, whole head lettuce and celery to retail and food service business across the UK and Ireland, as well as raw material salad crops to the UK and Ireland salad processing industry.

632
employees



Our Commitment

We have a zero-tolerance approach to slavery and human trafficking.

This commitment is embedded in our core policies, including:

- **Ethical Trade Policy:** Sets the foundation for ethical conduct and human rights within our business.
- **Whistleblowing Policy:** Provides a confidential channel for reporting concerns, including any related to modern slavery.
- **Human Rights Policy:** Upholds the fundamental rights of all individuals within our sphere of influence.
- **Bribery Policy:** Sets out our expectations on corruption and bribery.
- **Supplier code of Conduct:** Provides our supplier with visibility of our ambitions and requirements.
- The above policies were all reviewed throughout 24/25 and have been trained out across the businesses.



Our Actions

Robust recruitment

- We prioritize direct recruitment for permanent roles and partner with approved agencies when necessary.
- We engage with licensed Seasonal Worker Scheme providers and adhere to the Agency Worker Regulations 2010 (as superseded by AWR 2023) for temporary staff.
- All agencies undergo regular audits and checks and must be GLAA registered where required.
- We conduct thorough right-to-work, and identification checks for all employees.
- We insist that all labour providers, where required, have current GLAA licences and that they follow the provisions of the Gangmasters Licencing Act 2004, adhering to all their standards, protecting employees from poor treatment and exploitation.
- We are committed to the principle that no individual should be required to pay for employment opportunities, except where explicitly permitted by the legislation of their country of origin. We strive to uphold fair and ethical recruitment practices across all our operations and supply chains.
- Identification and right to work checks are carried out prior to induction, to ensure that all colleagues have the legal right to work in the UK and robust documentation verification 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 colleague, making sure that we avoid any risk of employing individuals under the age of 18 unless as apprentices.

We ensure that each colleague holds a bank account that is unique to themselves and is freely held.

Supply Chain Management & Traceability

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Supply Chain Management & Traceability

Throughout the 24/25 season we had the following:

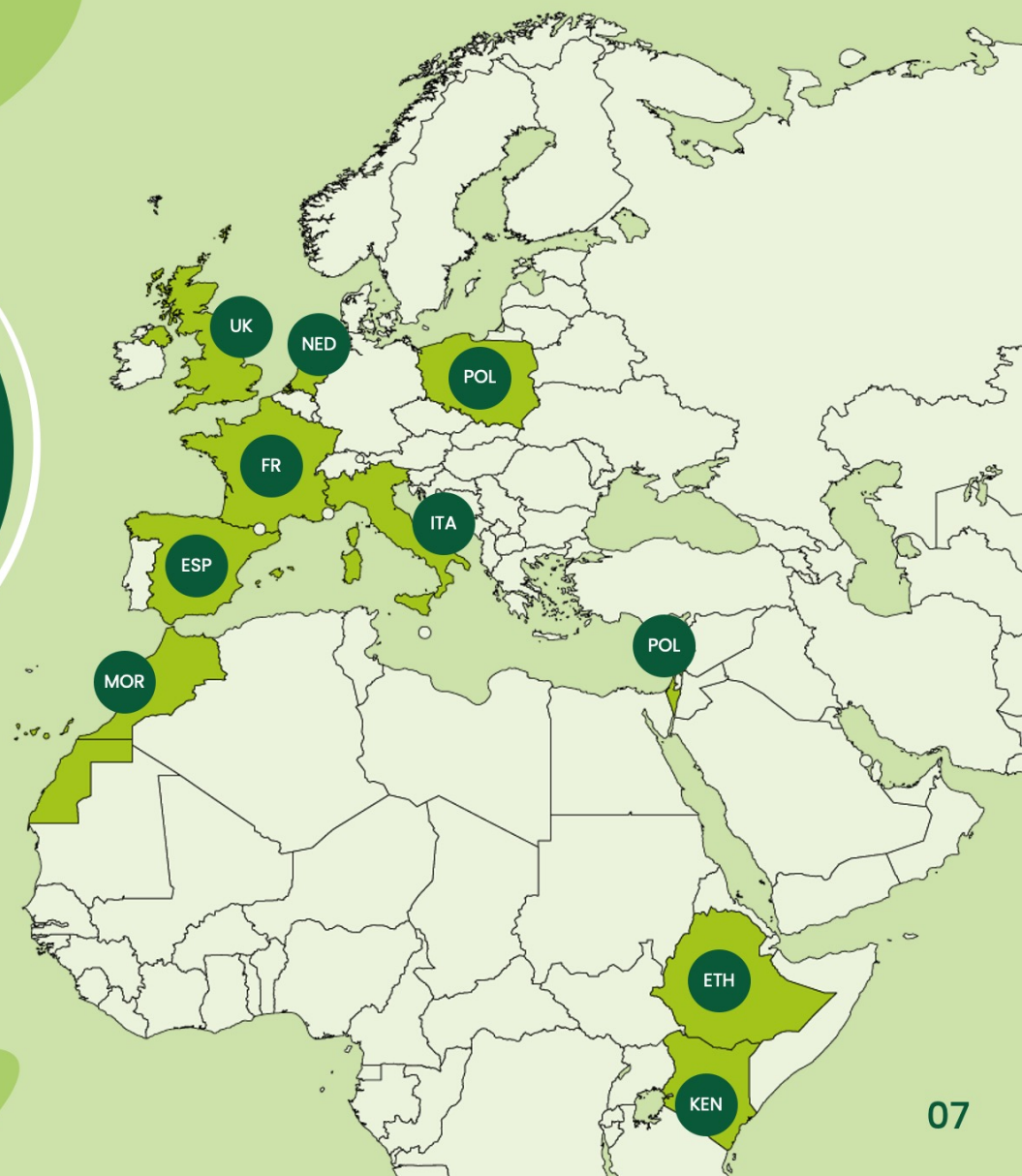
- 114 suppliers
- 10 different countries
- 57111 colleagues. 36% being female and 64% being male
- 64% of colleagues are permanent 36% of colleagues are seasonal or Temporary
- 100% of raw material suppliers are on SEDEX
- 100% of packaging suppliers are on SEDEX
- 50% of transport suppliers are on SEDEX
- 56% of suppliers have GRASP audits
- 33% of suppliers have SMETA audits
- 87.5% of suppliers completed the SEDEX Self-Assessment Questionnaire (SAQ)
- 33% of suppliers are high-risk as per SEDEX Radar

Incident

A potential issue concerning fee payments within the recruitment process was identified at our site during our annual SMETA audit. We conducted interviews and investigated the allegation, determining that the incident was historical,

Following the initial investigation, we worked with the labour provider, retailers, and an independent third party to ensure a thorough and fair investigation. The investigation is currently ongoing.

10
countries
of origin



Grievance Mechanism

We encourage reporting of any concerns through our confidential Whistleblowing Policy and the 'SafeCall' system, which is trained out across the business.

- Display Unseen Modern Slavery Hotline posters to ensure our colleagues have multiple ways to raise grievances.
- Engaged with our raw material suppliers about implementing grievance mechanisms within their organisations.
- We encourage our Spanish growers to join Canal Foros which is run by the ETFA.

Collaboration

Member of the Food Network for Ethical Trade (FNET) sharing knowledge across the all member and working group sessions throughout the year.

- Co-lead of the 'Empowering work' working group in FNET.
- Members of the ALP.
- Members of The Ethical Trade Forums (ETFA) in Spain, attending international meeting and have growers that are actively engage with the programmes of knowledge sharing across Spain.
- Members of the Seasonal Worker Taskforce, with the HR and Training Manager sitting on Governance Committee.

Board Level Oversight

Our Board of Directors actively oversees our anti-slavery efforts.



Areas of Risk & Mitigation

We have identified potential risks within the following areas:

- **Labour:** Mitigated through robust recruitment practices, training, and partnerships with ethical labour providers.
- **Illegal payments within labour supply base:** Working in collaboration with all labour providers, colleagues, and stakeholders highlighting areas of risk and horizon scanning.
- **Fraudulent documentation:** Ensuring authenticities of all official documentation.
- **Raw materials:** Addressed through supplier due diligence, audits, and promoting ethical certifications.
- **Limited grievance mechanisms:** Being addressed via working closely with suppliers and in country working groups.
- **Packaging:** Managed through supplier engagement and SEDEX membership.
- **Transport:** Mitigated through due diligence and promoting SEDEX membership.
- **Indirect consumables:** Prioritizing local sourcing where possible.

Performance Indicators

We track key performance indicators (KPIs) to measure the effectiveness of our anti-slavery efforts. These include:

- Ensuring raw material, packaging suppliers and transport provider complete our Code of Conduct (ethical supplier packs).
- Working with suppliers to reduce their risk levels.
- Promoting SEDEX membership and ethical audits for suppliers.
- Increasing colleague awareness of modern slavery.



Training & Awareness

- Managers receive training on modern slavery through the 'Stronger Together' program.
- HR personnel are trained using the 'Responsible Recruitment' Toolkit.
- All colleagues undergo induction training on ETI Base code and modern slavery risks and reporting procedures.
- We actively participate in training and briefings provided by the Association of Labour Providers (ALP).

2024/25 Highlights

- **100%** of raw material suppliers are on SEDEX.
- **100%** of packaging suppliers are on SEDEX.
- **50%** of transport suppliers are on SEDEX.
- **56%** of suppliers have GRASP audits.
- **33%** of suppliers have SMETA audits.
- **87.5%** of suppliers completed the SEDEX Self-Assessment Questionnaire (SAQ).
- **33%** of suppliers are high-risk as per SEDEX Radar.
- **100%** of new starters received modern slavery training.



Our Actions

Commitments

Expand whistle-blowing programs within our supply chain.

Increase collaboration with organizations like FNET and Spanish Ethical Trade forums.

Develop and implement a new Supplier Code of Conduct.

Roll out the Just Good Work app to UK employees and Spanish suppliers.

Increase transparency within our Goods Not For Resale (GNFR) supply chains.

Roll out of modern slavery Champions.

For a member of each product supplier to attend a local Ethical Trader Seminar.

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.

Outcome

We have gained traction on this throughout the year via supplier briefings. We have rolled this on into our 25/26 commitments.

We are part of the Seasonal Workers Task Force governance committee, and we are a co-lead on the FNET Empowering Work working group.

Code of conduct has been developed and issued to all suppliers.

All employees recruited through the Seasonal Workers Scheme are advised to download the Just Good Work app before coming to join the PDM family. Ongoing work with the Spanish supply chain.

We have increased the number of Transport suppliers who are on SEDEX from 8% to 50%. Ongoing engagement in the supply chain.

Training program in place for modern slavery champions, first cohort of champion training not yet complete.

Unfortunately, there are no ethical forums in Italy but we are advocating the creation of this within in supply base and FNET. 60% of Spanish suppliers have attended the EFTA Forums throughout 24/25 year.

This is ongoing and with the changes in SEDEX SAQ this has been challenging to track.

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Commitments

Our commitments for 2025/2026 are as follows:

- Rolling out management training on Case Handling & Incident Management
- Review Human Rights Due Diligence framework
- Working with the Seasonal Workers Task Force and our labour providers to ensure employees awareness of the ULULA app that is providing all with feedback about the recruitment process and life at PDM Produce (UK) Ltd
- Joining MSIN
- Carry out full supply chain mapping for all recruitment pathways for PDM Produce (UK) Ltd and PDM Espana Salads S.L.
- Carry out an independent review of our Ethical Trade and Human Rights programs.

PDM Produce is unwavering in our commitment to ethical practices and human rights. We believe that everyone deserves a workplace free from exploitation. This statement reflects our ongoing dedication to combating modern slavery and ensuring that our business operates with integrity and respect for all.

This statement will be reviewed and updated annually.

Approved by
Philip Maddocks, CEO

