



Modern Slavery Statement

Introduction

Glinwell Marketing Ltd., supply specialist varieties of fresh produce of the highest quality to high street multiples and other organisations. Our supply chain comprises both U.K. and overseas organisations and is diverse in terms of size, location and the products and services provided.

Glinwell Marketing Ltd. is committed to establishing a zero-tolerance position towards acts of modern slavery. This includes establishing and improving systems and processes designed to eradicate all forms of modern slavery from within our business and our supply chain.

The Group comprises of:

Glinwell Plc

Glinwell Marketing Ltd

Hertfordshire Growers Ltd

Smallford Land*

* Smallford Land currently has no employees

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Statement Purpose

Modern slavery is estimated to affect 29.8 million individuals around the world. It includes those who have been brought to the U.K. from abroad, as well as vulnerable people already living within the U.K., who are forced to work against their will.

This statement is designed to meet the requirements of the Modern Slavery Act 2015, setting out the Company's commitment to eradicate any acts of modern slavery from within our business and supply chain. **Action Taken & Procedures in Place**

- **Employee Training** — In conjunction with the Gang Master Licensing Authority and Stronger Together, key personnel have sat comprehensive training on how to spot possible signs of modern slavery and what action to take if a case arises.



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- **Confidential Support** — We have ensured the telephone numbers for the Modern Slavery Helpline and the Salvation Army are prominently displayed within each of the Company's premises along with having implemented our own, fully confidential internal whistleblowing line for reporting potential cases.
- **HR Policies and Procedures** - We have reviewed and updated a number of our HR Policies and Procedures associated with eliminating modern slavery. In particular we;
 - 1. Ensure we adhere to U.K. Immigration, Asylum and Nationality checks in respect to Recruitment and Selection.
 - 2. Facilitate employees use of our detailed Whistleblowing Policy, in the event they have concerns about the Company's activities or wish to raise concerns about possible acts of modern slavery.
 - 3. Have an internal procedure for identifying and handling cases of modern slavery for both Glinwell Staff and our HR department.
 - 4. Ask suppliers to detail information on how they manage and monitor modern slavery through a detailed Good Practice Implementation Checklist.
- **Ethical Trading** — We continue to welcome and cooperate with regular ethical audits from our key customers, which include unsupervised interviews with employees. Glinwell also participate and are involved with SEDEX which is implemented throughout the growing supply chain.

Looking Ahead

- **Training** — We recognise changes in personnel creates a need to deliver additional training (including refresher training). As such in 2021 we will deliver a further programme to key managers and supervisors aimed at recognising the possible signs of modern slavery.
- **Employee Welfare Committee** — In 2021 we will revise the composition of our Employee Welfare Committee and train representatives to recognise the possible signs of modern slavery.
- **Supply Chain** — Our supply chain comprises both U.K. and overseas organisations and as such we recognise this represents the area of greatest risk with regards to possible occurrences of modern slavery. We will continue working with our independent auditors, to ensure scrutiny of possible modern slavery is an integral part of their ethical audit programme, to be undertaken during the next twelve months.



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Responsibility

We, the Directors of Glinwell Plc are ultimately responsible for ensuring the steps taken to minimise the risks of human trafficking or slavery are appropriate.

The Head of Technical, Head of Operations and HR Manager are responsible for the ongoing development and implementation of the Company's anti-slavery initiatives.

We, the Directors, will review and update this statement as required on an annual basis.

Joe Colletti

Director

Date

24-03-2021

Sam Cannatella

Director

Date

24.03.2021