



Modern Slavery and Human Trafficking Statement for Glinwell Marketing Ltd

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and sets out the steps we have taken and plan to take to minimise the risk of modern slavery in our business.

Introduction

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

We remain committed to establishing a zero-tolerance position towards acts of modern slavery. We continue to monitor and embellish systems and processes designed to prevent and eliminate all forms of modern slavery from within our business and our supply chain.

The Group is comprised of:

Glinwell PLC+

Glinwell Marketing Ltd

Hertfordshire Growers Ltd

Smallford Land*

*Smallford Land currently has no employees.

As a business with a heavy reliance upon labour, The Group remains committed to zero-tolerance towards acts of modern slavery and the eradication of all forms of modern slavery from within Glinwell's businesses and our supply chain.

Due Diligence

Employee Training:- Having benefitted from training organised in conjunction with the Gangmasters Licensing Authority and Stronger Together, our key personnel remain vigilant for any possible signs of modern slavery and understand what action to take, should such suspicions arise.

Confidential Support:- The telephone numbers for the Modern Slavery Helpline and the Salvation Army remain prominently displayed within our premises.

Policies and Procedures:- We continue to review and update our HR Policies and Procedures. In particular, we;-

1. Continue to undertake relevant "Right to Work Checks" in order to prevent illegal working, recognising that illegal working has been shown to be associated with modern slavery.
2. As part of the onboarding process, employees bank details provided have 'soft checks' to check for duplicate and sequential accounts.
3. Encourage employees use of our detailed Whistleblowing Policy, in the event they have concerns about the Company's activities or wish to raise possible concerns regarding possible act of modern slavery.
4. Have an internal procedure for identifying and handling possible instances of modern slavery.
5. Require suppliers to provide detailed information on how they monitor and act upon any instances of modern slavery through their internal, best practice checklists.
6. Ensure this statement is discussed during onboarding, particularly within company inductions.

Ethical Trading:- We continue to welcome and cooperate with regular ethical audits, instigated by our key customers. These include unsupervised interviews with employees. We also participate in and are involved with SEDEX, the world's leading online platform for managing and improving working conditions globally, which is implemented throughout the Growing supply chain.

Prevention & Mitigation Initiatives

Training:- We will deliver a further programme to key managers and supervisors aimed at recognising possible signs of modern slavery.

Employee Welfare Committee:- As part of our commitment to sustainability, we will revise the composition of our Employee Welfare Committee, ensuring representatives are trained to recognise possible signs of modern slavery.

Supply Chain:- We will continue to work with our independent auditors, to ensure such scrutiny is an integral part of their ethical audit programme.

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 remain responsible for the ongoing development and implementation of the Company's anti-slavery initiatives.

We, the Directors, will review and update the Statement as required on an annual basis:

Signed _____
Joe Colletti
Director

Date: 25/9/23

Signed _____
Sam Cannatella
Director

Date: 25/9/23