



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 is committed to ensuring that slavery, human trafficking, and exploitation have no place in our business operations or supply chain. As a supplier of specialist varieties of fresh produce to high street multiples and other organisations, we acknowledge our responsibility to respect and uphold the human rights of all individuals involved in our business activities, both directly and through our supply chains.

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.

Risk Assessment and Due Diligence

Our highest risk areas are those related to overseas sourcing, particularly from regions with known vulnerabilities to human rights abuses. We are actively working with our suppliers to monitor, assess, and mitigate these risks, ensuring they adhere to our ethical standards.

Our Policies & Procedures

We have implemented the following policies to prevent modern slavery and human trafficking in our business:

1. Anti-Slavery and Human Trafficking Policy
2. Ethical Policy for Suppliers
3. Social Compliance Policy
4. Child Labour – Remediation Policy
5. Human Rights Policy

Procedures

We continue to review and update our 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.
7. 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.

Measures Taken to Address Modern Slavery

In the last year, we have taken the following actions to address and reduce the risks of modern slavery in our business:

- Continued to build awareness within our teams about the importance of identifying and reporting modern slavery.
- Continued to work with our independent auditors, to ensure such scrutiny is an integral part of their ethical audit programme.
- Having benefitted from training organised in conjunction with the Gangmasters Licensing Authority and Stronger Together, our key personnel are trained to remain vigilant for any possible signs of modern slavery and understand what action to take, should such suspicions arise.
- The telephone numbers for the Modern Slavery Helpline and the Salvation Army remain prominently displayed within our premises.

Future Actions

We are committed to continuously improving our efforts to combat modern slavery. Over the coming year, we plan to:

- Introduce a more detailed reporting mechanism for employees and suppliers to report any suspected cases of modern slavery.
- As part of our commitment, we will revise the composition of our Employee Forum, ensuring representatives are trained to recognise possible signs of modern slavery.
- Work with industry groups and stakeholders to improve best practices for preventing modern slavery.

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. We take our responsibility to prevent modern slavery very seriously. We will continue to evaluate and strengthen our policies, processes, and relationships with suppliers to ensure that modern slavery has no place in our business operations or supply chain.

We are committed to making a positive difference in the lives of those who produce the goods we supply and maintaining the highest standards of ethical business practices.

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: 25-11-24

Signed 
Sam Cannatella
Director

Date: 25-11-24

