

## **MODERN SLAVERY STATEMENT 2018/2019**

TH Clements & Son Ltd grows, harvest, packs and supplies brassica produce and potatoes to a range of customers including Retailers, Food Service Suppliers and Processors. We are a family owned business with an operational management structure for daily, weekly and monthly accountability.

Our company is committed to preventing slavery, human trafficking and labour exploitation within our business, our supply chains and the community around us.

TH Clements employs over 350 permanent workers in positions of Management, Administrations, Factory and Field Operatives, Drivers and Skilled Workers. We will also employ up to 300 agency workers per week during peak seasonal periods. We have identified that our agency workers are at a greater risk of Labour Exploitation especially those working in small field harvesting teams. However, we only look to contract Labour Providers who work legitimately, ethically and professionally throughout the year. Labour Providers are audited each year, and a selection of workers are interviewed about their terms and conditions and welfare. We work closely with the Gangmasters Licensing and Abuse Authority to remove any Labour Providers who are not working under the correct licensing conditions

We will ensure that our processes within the company eliminate any chance of Slavery and Human Trafficking by ensuring:

- All workers are paid independently into their nominated bank account
- Workers are in possession of their ID Card and bank cards
- Workers are not seen to be suffering from any inhuman or harsh treatment
- We hold a thorough induction with all workers and take a copy of their original ID during the induction process.
- Workers are interviewed periodically to understand the details on how they are paid, who they work for and where they live.
- We observe the people who carry out work for us and report any issues we are concerned about to the relevant personnel.
- We audit and review the Labour Provider Agencies who work for the company at least once per year
- We communicate the issues of Modern Day Slavery and Human Trafficking around the business and invite people to report any issues they may see to the HR Team
- We have notified all employees and workers of our whistleblowing telephone number if they wish to alert a problem anonymously.

Everyone within our business has a responsibility for ensuring the basic labour standards are met and that all employees and workers are treated with respect and integrity at all times. **Rachel Gedney, HR Manager** is the nominated person responsible for ensuring that efforts are made to investigate and remediate the risk of modern slavery in our business and the supply chains.

We check all our primary suppliers of produce to ensure they are using reputable Labour Providers and pay them a fair price for their goods or services to eliminate the need for them to pay for cheaper slave or bonded labour.

The Directors and senior management are committed to the Stronger2gether initiative and will ensure a significant representation from this company have undergone Stronger2gether training.

We are committed to the Ethical Trading Initiative and will continue to abide by its rules under our Ethical Trading Policy. We continue to improve and develop our safe working practices and provide a facility that all employees continue to enjoy working in. Regular Ethical Audits allow us to test our rigorous systems and confirm the standards that we pride ourselves on.

All senior managers and directors are aware of the Modern Slavery Act 2015 and will enforce the correct and humane treatment of all our employees and workers and associates that work within or in conjunction with this company.

TH Clements will never knowingly be involved with an organisation that is involved with any type of modern day slavery, exploitation or human trafficking. The Board of Directors and senior management of the company are committed to the eradication of slavery in our industry and have approved this statement on behalf of the company.



Signed .....

Date *1<sup>st</sup> November 2018*

**Chris Gedney, Managing Director**