

Modern Slavery Statement

52 weeks ending 26th April 2025



Introduction

This modern slavery statement has been created pursuant to Section 54 (1) of the UK Modern Slavery Act 2015. It demonstrates how Fresca Group Limited and its subsidiaries (the Fresca Group) are positively engaged in tackling modern slavery and labour exploitation. The health, safety and welfare of our employees is, and always has been, our primary focus and we commit to being proactive in our approach to mitigate risks posed by exploiters.

The International Labour Organisation (ILO) estimates that fifty million people worldwide were living in modern slavery in 2021 - ten million more than in 2016. Human rights risks, including modern slavery and labour exploitation, are prevalent in the fresh produce industry and the Fresca Group acknowledges that our business activities are amongst three of the GLAA's highest risk industries – agriculture; food processing, packaging and production; and warehouse and distribution. Therefore, Fresca recognises the duty we have to conduct the most effective due diligence with the goal of identifying and mitigating risks. We recognise this responsibility as both rights-conscious employers and customers. We also use the influence we have with our suppliers to engage with them in improving their business practices and conditions for workers, whilst building long-standing relationships and partnerships for the future. Fresca understands that work on this topic is an ongoing process and therefore we strive for continual improvement year on year.

Following comprehensive ethical management framework assessments across all our businesses in 2024, we have strengthened our governance structures, enhanced our risk assessment processes, and expanded our due diligence approach to address identified areas for improvement and ensure robust protection for all workers in our operations and supply chains.

Our Story

The Fresca Group's roots trace back over 150 years ago from 1874, when Matthew Mack opened the first Mack fresh produce stand at Covent Garden Market. Since then, the Mack generations have adapted and grown the business to what it is today. In 2005, Fresca Group Limited was established as the overall holding company for the rapidly expanding group, being one of the largest privately-owned supplier of fresh produce in the country with c.45% of our business owned by our own people.

The Fresca Group today is an investor and parent company for a number of subsidiary and joint venture businesses supplying fresh vegetables, salads and fruit to the UK. Within Fresca are some core group functions such as Finance, IT, Category Marketing, Communications and ESG who work with all the Fresca businesses both individually and as a group enabling maximum efficiency and effectiveness.

Employing over 1200 people, we recognise that people are at the heart of everything we do, so supporting their welfare is of paramount importance. Fresca's motivation for improving ethical standards comes from the very top of the organisation.

Our mission is to be the First Choice Produce Partner. Doing business the right way - ethically and sustainably, for our people, partners, products and planet.

A key benefit of being a group of companies is being resourced to facilitate knowledge sharing and good ethical practices between our businesses, driving further improvements.

Our Values



Flexibility

In our way of working,
our service and our direction



Resourcefulness

Finding solutions, even in
the toughest of times



Excellence

In our products, our people, our
facilities and our performance



Sustainability

Working for a greater
future, stronger ethics &
longer relationships



Character

A group with diversity,
passion and personality,
with people who care



Ambition

Driving developments
for Fresca, for our people
and our partners

Our Business and Supply Chains

Operating Businesses



Importer, packer, ripener and marketer of fresh fruit. Based in Evesham, Worcestershire.



Avocado specialist, importer and marketer. Based in Paddock Wood, Kent.



Experts in the growing & supply of speciality vegetables in the heart of Lincolnshire.



Fresh produce service solutions. Based in Paddock Wood, Kent.



Logistics and customs service for fresh produce, based in Paddock Wood, Kent.



Growing, packing & marketing speciality tomatoes, peppers & cucumbers from a landmark site in Kent, and lettuce in Chichester.



Branches in Birmingham, Bristol and Southampton. Broad customer base, including foodservice, caterers, secondary wholesalers, cruise lines and retail chains.

Joint Ventures



Packing and marketing the highest quality potatoes and vegetables. Based in Lincolnshire.



Marketing the avocado production of the leading Colombian avocado producer, Cartama, across Europe.



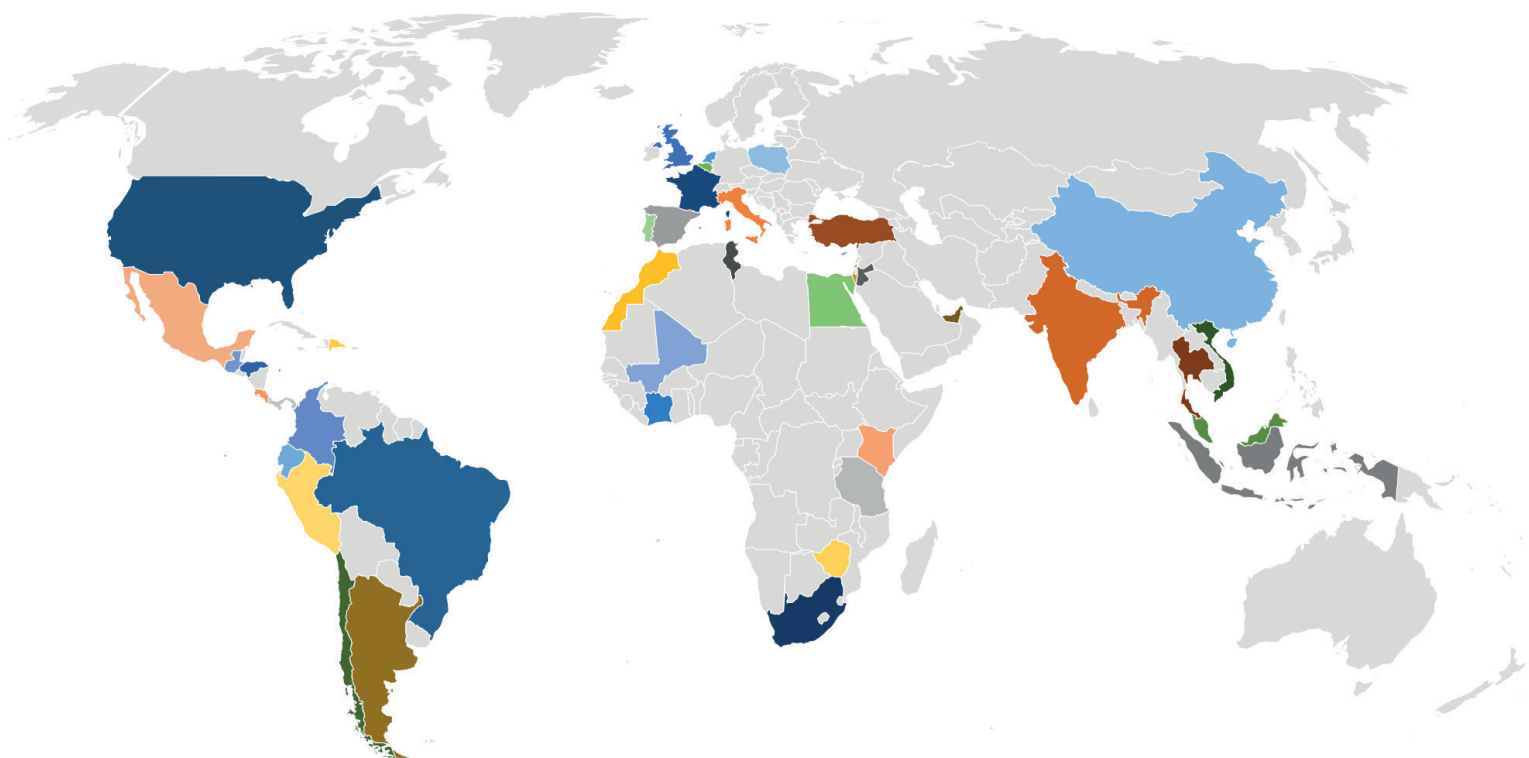
Research and commercialisation of exceptional new plum and interspecific stone fruit varieties from the Zaiger breeding programme in South Africa.

Supply Chains

The supply chains throughout Fresca are large and complex with our suppliers located in 41 countries. We acknowledge that modern slavery and labour exploitation exists, and we are committed to using our network and resources to manage and minimise these risks within our communities. To be successful, we must work to improve visibility and transparency of our multi-tiered supply chains, whilst considering supplier variables such as languages, cultures, legislative regimes, economic environments and approaches to human rights.

Following our 2024 ethical framework assessments, we have implemented enhanced supply chain mapping processes with clear definition of what is within our management scope, enabling more targeted and effective risk management across our supplier base.

Countries We Source From



Our Policies

The Fresca group of businesses has a number of internal policies to govern processes including, but not limited to, labour provider management, recruitment fees or handling potential cases of exploitation. Included in our extensive list of policies are:

A **Human Rights Policy** committing to respecting and promoting human rights throughout our businesses.

A **Recruitment and Selection Policy** to ensure effective, ethical and consistent recruitment practices and to ensure all applicants are treated fairly.

A **Code of Conduct Policy** to provide clear guidelines and expectations regarding ethical behaviour and practices within our organisation.

An **Equality and Diversity Policy** to ensure equality, diversity and inclusion, and to promote a culture where each employee is treated with respect and dignity.

An **Anti-Harassment and Bullying Policy** committing to provide a work environment free from harassment and bullying.

Grievance and Whistleblowing Policies to provide channels for our people to raise concerns or report allegations anonymously and without repercussion, including an anonymous feedback line and anonymous online form. Worker welfare chats also provide workers with another channel to raise concerns.

In 2024, Fresca undertook a comprehensive review of our ethical management systems across the group to identify opportunities to improve ethical management and deploy group policies consistently across all businesses.

Our Due Diligence and Risk Management

The Fresca Group due diligence process for our suppliers uses a combination of desktop risk assessments, engagement with suppliers, supplier self-assessment questionnaires, audits and other external factors such as information databases and known industry risk factors. Through these methods, we risk assess our suppliers and deploy the appropriate level of resource and support.

Due to the scale and complexity of our supply chains, we have adopted a continuous improvement approach, focusing our resources towards areas our due diligence determines are higher risk.

Enhanced Risk Assessment Framework

Our 2024 framework review has led to implementation of a more comprehensive risk assessment approach that moves beyond compliance-driven systems to proactive risk management:

Multi-Dimensional Risk Analysis

- Inherent risk assessment based on country, sector, and product-specific factors
- Live risk monitoring that responds to changing political, economic, and social conditions
- Forecast risk analysis to anticipate and prepare for emerging threats

The 4 P's Approach

- **Pursue:** Proactive investigation and intelligence-led targeting of potential risks
- **Prevent:** Enhanced control measures and supplier capacity building programmes
- **Prepare:** Comprehensive supplier preparation for emerging risks and challenges
- **Protect:** Robust protection mechanisms for workers throughout our supply chains

Fresca businesses request ethical standards of their suppliers and expect effective implementation of policies and ethical practices to be present within supplying businesses, whilst considering the size and nature of their business. We require all suppliers to commit to our ethical terms of supply, through which we set out minimum welfare criteria for workers, and state that suppliers conduct their own due diligence on their supply chains, with particular focus on risk factors such as labour providers.

To corroborate adherence to these standards, relevant suppliers must have completed their Sedex SAQ to 100% and some suppliers, as determined by our customers, have SMETA audits at regular intervals.

Fresca also sends out an Ethical Questionnaire for produce suppliers. This enables us to ascertain where ethical hazards are present and determine potential risks that need immediate attention. Each year we work on increasing the completion rate with the goal to this becoming a mandatory condition of supply.

Enhanced Governance Structure

Following our comprehensive framework assessments, we have strengthened our ethical governance across all businesses:

- **Designated Specific Points of Contact (SPOCs)** with appropriate ethical trade experience and training at each business unit
- **Formal roles and responsibilities** integrated into job descriptions across management levels
- **Enhanced training programmes** including ETI, CIPS, and Stronger Together certification
- **Stakeholder mapping and requirements matrix** ensuring comprehensive coverage of all customer and regulatory requirements
- **Continuous improvement programmes** with strategic suppliers based on risk assessment outcomes

Audits

Each of the retailer-serving Fresca businesses undertakes third party ethical audits that align with international standards. First party audits are also carried out internally to continually monitor our standards against the ETI basecode, industry standards, customer requirements and local legislation.

A number of our suppliers also undertake third party ethical audits – this is determined either through risk assessment or our customer requirements. The results from these audits enable us to understand where our suppliers are in their social journey and help to identify where they might need additional support to improve. We will always give them the opportunity to work on areas of non-conformances before taking decisions to move away from the supplier and provide support while they do this. Supplier visits also help to identify any potential unethical practices.

Fresca businesses also conduct second party audits on their service provider suppliers such as labour providers, cleaning companies and security companies.

Enhanced audit scope now includes specific focus on labour provider management, accommodation standards, worker engagement mechanisms, and effectiveness of grievance systems based on our live risk assessments.

Our Effectiveness

Much of the success in identifying and mitigating risks of modern slavery and exploitation rely on people. Modern slavery is a hidden crime, and without equipping people with the knowledge to understand red flags, modern slavery across the globe goes unnoticed. Fresca understand that to have any level of impact on combatting modern slavery and exploitation, we must expand knowledge-sharing as wide as possible.

As a network of companies, we can ensure our people are trained on modern slavery and have the confidence to report concerns, and we join forces with others in the industry to become a stronger influence for good.

Fresca prides itself on finding and resolving issues when they arise, our effectiveness is ultimately determined by the management of such issues and how we engage. We have adopted a 4P approach to demonstrate how we Pursue issues, learn from them and both Prevent recurrence and Prepare our business and supply chain. The culmination of this increases Protection for all stakeholders.

Our 2024 framework assessments have enabled us to move beyond theoretical compliance systems to practical, risk-driven approaches that deliver tangible improvements for workers throughout our operations and supply chains.

The Fresca Group has identified ethical challenges within its supply chains, which reflect broader systemic societal issues inherent to global sourcing operations. In response to each identified case, the organisation has implemented comprehensive remediation protocols encompassing effective due diligence, corrective actions, and systematic improvements aligned with the Pursue, Prevent, Prepare, and Protect framework. These interventions demonstrate the Group's commitment to proactive ethical management and continuous enhancement of supply chain standards.

Training

Internally, new starters are trained on modern slavery either during their induction or are assigned an e-learning module. Additional in-depth training is given to certain teams or groups of people. For example, all site Human Resources teams have had in-depth human rights and modern slavery training and further training is also being cascaded to procurement and commercial colleagues.

A number of colleagues across the group have also attended Stronger Together – Tackling Modern Slavery in UK Businesses training.

Enhanced training programmes now include:

- **Role-specific training for procurement, commercial, and operational teams**
- **Regular capability assessments to ensure adequate skills and resources**
- **Comprehensive training packages for suppliers in multiple languages**
- **Leadership development incorporating ethical decision-making**

On-site, Fresca businesses raise human rights and wellbeing awareness to continually remind our people of the importance of this topic. This is done through posters, noticeboards and the internal colleague communications app 'Grapevine'.

Collaboration and Networks

The current scale of modern slavery and labour exploitation means one organisation cannot tackle the issue alone. Being part of ethical networks and collaborating with other socially responsible businesses within the industry enables the best use of resources as projects can be worked on together, solutions shared, influence heightened, and therefore maximum progress made.

Food Network for Ethical Trade (FNET)

The Food Network for Ethical Trade is a collaborative initiative aiming to use the collective leverage of suppliers and retailers to bring about positive change in working conditions in global food, beverage and horticulture supply chains by providing guidance, resources, training and opportunities for collaboration.

FNET members include major UK food retailers, national and international food and horticulture processors, manufacturers and importers. Fresca attend regular online industry updates and in person FNET events.

Modern Slavery Intelligence Network (MSIN)

MSIN is a pioneering non-profit collaboration in the UK food and agriculture sector created in response to the findings of Operation Fort (the UK's largest ever modern slavery investigation). Information generated by the network is used to detect, prevent and disrupt modern slavery and labour exploitation activity in the industry, protecting workers and improving outcomes for those directly impacted. Fresca were one of the founding members of the Modern Slavery Intelligence Network and continue to pioneer the platform.

Spanish Ethical Trade Forum (SETF)

The Spanish Ethical Trade Forum is a multi-stakeholder collaborative initiative established in 2015 in response to a recognised need to promote better working conditions within the Spanish agri-food sector. The Forum has three pillars: **1. Meetings**, **2. Capacity Building**, and **3. Working Groups**.

A number of the Fresca Group businesses use suppliers in Spain and therefore Fresca are Associate Members of the Forum. Fresca representatives attend the annual international event, and we actively promote the forums to our Spanish suppliers.

Association of Labour Providers (ALP)

Established in 2004, the Association of Labour Providers promotes responsible recruitment and good practice for organisations that supply essential workers across a number of sectors, including the food industry. The ALP influences government and regulatory policy and provides a wide range of practical and up to date information and services to its members.

As a labour user, Fresca are Associate Members of the ALP and therefore have access to webinars, updates and guidance documents and use these through a labour user lens.

Our Key Achievements

Remediation

Outlined below are two of many examples where approaches of the ethical teams around the group have delivered effective remediation within a situation.

Return of Unpaid Holiday

A whistleblower report through the established grievance mechanism identified allegations of unpaid holiday entitlements within the supply chain. Following thorough investigation, these concerns were substantiated. Fresca oversaw the complete restitution of outstanding holiday payments to affected workers, implemented enhanced monitoring systems with the supplier, and conducted comprehensive follow-up auditing to prevent recurrence. This case exemplifies Fresca's commitment to fundamental ethical principles and collaborative supplier development to strengthen operational processes.

Worker Substitution

Fresca businesses have identified the escalating risk of worker substitution, whereby individuals without legal working status misrepresent their identity to gain employment. Through focused procedural enhancements, the Group has successfully detected and prevented multiple attempted breaches of employment verification systems. Fresca has collaborated with regulatory authorities and industry partners to disseminate best practices, demonstrating the efficacy of their risk assessment frameworks, due diligence protocols, investigative capabilities, and cross-sector partnership approaches. This proactive stance illustrates the Group's commitment to maintaining employment law compliance whilst contributing to broader industry standards for workforce verification.

Ethical Management System Progression

The Fresca Group continues established work based on a solid foundation for ethical management across all facilities, with particularly strong progress in governance structures and documentation in the past 12 months.

The transition from compliance-based to proactive ethical management remains a difficult challenge and success in the next phase will depend on:

- Addressing resource constraints that limit field-based due diligence
- Moving beyond theoretical risk assessment to practical risk management
- Developing more in-depth supplier partnerships for continuous improvement

The group's commitment to ethical trade is evident, but translation of this commitment into operational excellence requires sustained investment in capability, resources, and strategic focus on proactive ethical management practices.

Supplier videos

Digital training suite resources in English and Spanish for our supply chain as discussed in the 2024 Modern Slavery Statement are now complete and fully deployed.

GroceryAid

GroceryAid is a charity that provides free and confidential emotional, practical and financial support for those working in the grocery sector. Fresca have been supporting GroceryAid since 2022, and 2 Fresca colleagues are GroceryAid Network Members.

Fresca has been recognised as a Gold Award supporter since 2023, an accolade awarded when an organisation has demonstrated active participation across three critical pillars - Raising Awareness, Fundraising and Volunteering.

It is important for us to support and raise awareness of GroceryAid as they play a vital role in supporting our colleagues through the provision of resources such as counselling and has supported our own colleagues on many occasions. The resources they provide are tailored specifically for organisations such as ours. The businesses have also engaged in cake sales and competitions to raise money for GroceryAid. HR teams have been trained on the full suite of services offered by GroceryAid, and can recognise when to signpost colleagues to this important resource.

Enhanced Reporting and Impact Measurement

The Fresca Group has strengthened its internal reporting framework, implementing monthly ethical performance reports to both business and Group boards. This enhanced reporting transcends traditional compliance metrics to encompass tangible interventions and improvements that directly benefit workers across our operations and supply chain.

Building upon Fresca's established approach of proactively addressing ethical challenges, our evolved due diligence and risk assessment methodologies enable more sophisticated identification and resolution of workplace issues.

This comprehensive approach has achieved complete remediation of all identified ethical concerns, demonstrating the Group's commitment to continuous improvement and worker welfare enhancement throughout its global operations.

Statement of Responsibility

Our strategy for the reporting year ending April 2026 is already underway and we look forward to delivering further improvements for those employed in our business and supply chain.

I, the undersigned, take responsibility for this statement and represent the board of the Fresca Group Limited for overall ethical compliance.

NAME: *Martyn Fletcher*

POSITION IN COMPANY: *Chief Executive Officer*

DATE: *1st October 2025*



This statement covers the activities of Fresca Group Limited and all subsidiary companies for the reporting period ending 26th April 2025. It will be reviewed annually and updated to reflect our evolving approach to combating modern slavery and labour exploitation.