



Modern Slavery Statement

Berry Gardens Ltd
(trading as Driscoll's UK)

**Financial
Year
2024**

Driscoll's
Only the Finest Berries™

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INTRODUCTION

In line with the requirements of the UK Modern Slavery Act 2015 (the 'Act'), Berry Gardens Ltd, trading as Driscoll's Maidstone, outlines the steps taken during the financial year from January 2024 to December 2024 to **prevent modern slavery and human trafficking within our operations and supply chains**. This statement reaffirms our ongoing commitment to ethical business practices and the protection of human rights.

We recognise that modern slavery and human trafficking remain complex and evolving global issues. As such, we are dedicated to conducting our business with Integrity, Transparency, and Accountability. We strive to uphold the highest ethical standards and ensure that respect for human dignity is embedded throughout our organisation.

Our approach is one of zero tolerance. We actively promote awareness among our employees and workers, ensuring they understand the signs of modern slavery and know how to report concerns confidentially and responsibly.

Throughout the past year, we have implemented a range of initiatives aimed at strengthening our safeguards against modern slavery. These actions are detailed within this report and reflect our proactive stance on this critical issue.

Looking ahead, we remain focused on enhancing our practices and working collaboratively with partners, stakeholders, and industry peers. **Our goal is to continuously improve our ability to identify and address risks, share knowledge, and contribute meaningfully to the eradication of modern slavery.**

This statement was approved by the Driscoll's
EMEA Leadership Team

Ellen van der Wees

VP of HR – Driscoll's of Europe,
Middle East and Africa
April 2025

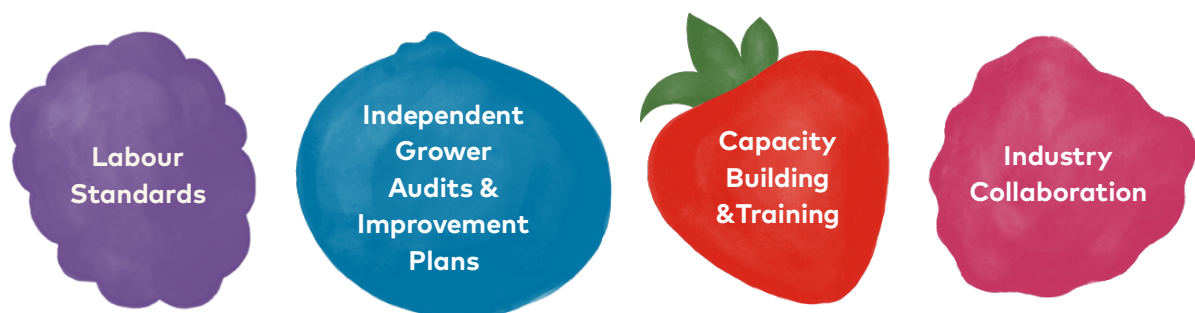


ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Berry Gardens Ltd has been owned by Driscoll's since 1st November 2022 and supplies both UK and Imported soft fruit to retailers, wholesales and catering outlets. The UK headquarters is based in Kent and directly employs a team of more than 420 employees.

Driscoll's has over 100 years of farming heritage and hundreds of independent growers around the world. We are passionate about growing great tasting strawberries, blueberries, raspberries and blackberries. We are the global market leader for fresh berries grown in more than 22 countries and sold in more than 60.

Our global reach and the nature of our business means we operate in some countries which are of higher risk of Modern Slavery. Although the majority of Driscoll's wider workforce is employed by our independent growers, we have a responsibility as a trusted brand to ensure all workers in our supply chains are treated with respect and working within Driscoll's enterprise is a source of pride. To mitigate risks in our supply chain, we work closely with our suppliers and take a transparent, structured, aligned and sustainable approach to tackling Modern Slavery. Collaboration is key to maintaining our standards and striving for continuous improvement. **Our labour program is comprised of four main activities:**



Maintaining, implementing and monitoring our standards and practices in the UK is led by our HR, Operations, Social and Environmental Impact and Compliance teams supported by the local and EMEA business unit management teams.

POLICIES ON MODERN SLAVERY

We have several internal policies (as part of Driscoll's Code of Conduct) including: Preventing Hidden Labour Exploitation Policy and our Whistleblowing Policy that support our aim of preventing Modern Slavery within our organisation and supply chains. We also have our labour standards which define Driscoll's core workplace principles and expectations in relation to employment and prevention of modern slavery which apply to all workers in our supply chain, with no distinction. Our implementation efforts of these standards focus on **providing protection to the most vulnerable employees of our enterprise, particularly those workers who are migrant and work on a seasonal basis.** Our labour standards are based on the International Labour Organisation (ILO) Conventions and Recommendations, the SEDEX Members Ethical Trade Requirement (SMETA), the Global Social Compliance Program (GSCP) standard, the Business

Social Compliance Initiative (BCI) standard, local legislation and a collaborative review of agriculture-specific standards from several non-governmental organisations.

We expect businesses that work with us to respect the human rights of their employees and workers and to take all reasonable steps to prevent Modern Slavery within their own organisations. We will not knowingly work with those that do not.

We are a member of SEDEX and are independently audited to these standards ourselves.



We take a
**ZERO-
TOLERANCE**
approach

In addition to the policies mentioned that specifically relate to Modern Slavery we also have effective grievance mechanisms and treat any allegation of a breach of our policies seriously. We provide an independent and confidential whistleblower line that enables employees, customers and suppliers to raise any concerns in their native language via a number of channels including a multi-lingual phone line to help remove any communication barriers.

EXTERNAL PARTNERSHIPS

Modern Slavery is a global issue that we cannot solve in isolation. One of Driscoll's core values is the humility to respect and learn from our colleagues and competitors which we feel is particularly appropriate where Modern Slavery is concerned and as such, we work in collaboration with specialist organisations such as Stronger Together, with whom we are proud to hold Business Partner status and with competitors and suppliers through specialist forums such as Food Network Ethical Trading (FNET).

We are also active members of/work actively with:

- The Developing Common Due Diligence Tools Working Group and Empowering Working Group,
- Spanish Ethical Trade Forums (AFCE),
- Modern Slavery Intelligence Network (MSIN),
- Seasonal Worker Scheme Taskforce (SWSTF)
- Due Diligence and Good Practices during Recruitment and On Farm (part of workstream),
- Fresh Produce Consortium (FPC)'
- The Sustainability Group

DUE DILIGENCE PROCESSES

We have several due diligence processes to help us manage the risk of Modern Slavery in our own business and in our supply chains. Our Labor Standards are reinforced through training, onboarding, and visible materials. Social audits, based on country and site risk, are conducted internally and externally. Non-compliance prompts corrective action, with ongoing issues leading to supplier exclusion.

Our due diligence processes include:

Supplier Risk Assessments

We risk assess all of our suppliers through industry relevant bodies and conduct business to the **Ethical Trading Initiative (ETI)** principles. Audits are carried out by trained auditors on a periodic basis depending on risk.

Supplier/Grower Audits

We work closely with our grower base to monitor worker welfare and ensure the international standards, in country law and industry expectations are met. We carry out compliance checks which include checking pay meets required minimum standards with no unexplained deductions, labour practices, health and safety, farm contracts, accommodation standards, grievance mechanisms and ethical training across the growers' management teams.

We pro-actively promote guidance, training and tools in line with industry best practices such as the Just Good Work App, Responsible Recruitment Toolkit and UK Grower Seasonal Worker Toolkit.

Growers are SEDEX members and are SMETA audited as per guidelines.

In some parts of our supply chain, depending on risk we also conduct specific social audits, engaging directly with workers. Worker input is a critical component of our social audits and they are engaged in both group and individual interviews across a representative sample of workers, including reaching vulnerable groups such as pregnant women, migrant workers and indirectly employed workers.

Agency Audits

Our HR team carry out regular audits annually on our temporary labour providers and assess them for statutory compliance in line with UK legislation, GLAA licensing standards, their adherence to ETI Base Code, Agency Worker Regulations and other general employment and financial legislation.

All non-conformances are recorded and have to be closed out within agreed timescales. Serious non-conformances, particularly in relation to Modern Slavery concerns could result in termination of contract.

Worker Voice Survey

Our workforce have the opportunity to take part in employee voice surveys which gives them the chance to raise concerns anonymously and give us an understanding of how engaged they feel.

SEDEX Self Assessment Questionnaire

We ensure that our Self Assessment Questionnaire on SEDEX is regularly updated so our customers and suppliers can see what measures we have in place and what we are working to achieve.

Summary

We feel the measures we have in place are a strong foundation for us to continue to build upon and demonstrate our commitment to preventing Modern Slavery within our business and to being transparent and collaborative with our policies and procedures.

TRAINING AND RAISING AWARENESS

We work hard to continually raise awareness of Modern Slavery and employee rights amongst our colleagues and agency workers from the point of induction. We utilise resources from **Stronger Together** to ensure that information is delivered in employees and workers native languages where possible.

We display multi-language posters around site, including on the back on toilet cubicles with information about Modern Slavery, including indicators and how to get help if it is needed.

During this reporting year 16 members of our HR, Production Management, Technical, Compliance and Training Teams attended 'Preventing Modern Slavery in UK Businesses' training hosted by Stronger Together.

To mark Anti-Slavery Day, we launched a company-wide awareness campaign to educate and engage our workforce on the realities of modern slavery. An informative email was distributed to approximately 150 employees with email access, highlighting the global scale of modern slavery and encouraging vigilance and awareness.

In addition, we delivered an in-person awareness presentation to over 200 colleagues, including both employees and agency workers in our Production and Warehouse teams. The session focused on recognising the signs of modern slavery and provided clear guidance on how individuals can seek help if they suspect they or someone else may be at risk.

To further promote engagement, we invited all employees to participate in an Anti-Slavery Day quiz. With prizes on offer, the quiz served as an interactive way to deepen understanding of modern slavery and reinforce key messages from our awareness efforts.

Our Head of Compliance, EMEA attended the Modern Slavery Intelligence Network conference in 2024 and is actively working on our membership process with them.



MEASURING EFFECTIVENESS

Since last year we have started to monitor some KPIs in relation to Modern Slavery to complement our other ethical and sustainability related KPIs.

In the coming 12 months we will continue to monitor our KPIs for improvements and also consider other KPIs which may also help us measure our effectiveness.

The KPIs we have been monitoring are:

- Year-on-year improvements on the Stronger Together Progress Reporting Tool
- Maintaining and/or improving upon our Stronger Together Business Partner status
- Hosting an annual modern slavery awareness event and increasing attendance year-on-year

PRIORITIES FOR THE NEXT 12 MONTHS

Over the next 12 months our plans include:

- Hosting another Modern Slavery awareness event in October during Anti-Slavery week
- Providing further Modern Slavery training for managers and supervisors who couldn't attend the 2024 training
- Continue to measure our progress through monitoring our KPIs
- Maintain or improve on our Stronger Together Business Partner status
- Achieve MSIN membership
- Host awareness workshop to share knowledge with our customers
- Continue to collaborate with suppliers, customers and other industry groups to share knowledge and further develop our understanding of Modern Slavery as it continues to evolve and change

The background of the entire page is decorated with various berries and green leaves. There are two large red strawberries, one in the top left and one in the bottom center. A blueberry is in the top center, and another is in the bottom left. A purple raspberry is in the top right, and another is in the middle left. A pink raspberry is in the middle right. A yellow lemon is in the bottom right corner. Numerous green leaves are scattered throughout the page, some near the berries and others on their own.

Thank
you

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