

Modern Slavery Statement

1. Introduction to Modern Slavery

This is Greencell's second modern slavery statement following the introduction of the Modern Slavery Act 2015. Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a 'slavery and human trafficking statement for each financial year of the organisation'. The statement refers to our financial year ending 31st December 2017.

2. Organisation's Structure and Business

Greencell is part of Westfalia Fruit Group which in turn is part of Hans Merensky Holdings which is governed by the Hans Merensky Trust.

Greencell operates from three sites in the UK; Kings Hill, Spalding and Paddock Wood. The ripening, packing and supply of avocados to major high street retailers and the wholesale markets is the predominant business.

Westfalia Fruit is recognised as being one of the largest growers of avocados worldwide with the reputation for supplying superior, organic, Fairtrade & conventional quality fruit year round. Westfalia Fruit is a truly vertically integrated company operating oil and fruit processing plants producing avocado oils, guacamole and dried fruit. In addition to Greencell, Westfalia Fruit also owns similar businesses in Europe; Comexa in France and Westfalia B.V. in Holland.

3. Leadership

Greencell Managing Director and Senior Management team fully endorse this policy statement and work towards ensuring "Slavery and Human Trafficking is prevented within Greencell and its supply chain.

Elizabeth Williams, CSR Manager, is the nominated person responsible for ensuring that efforts are made to investigate and remediate the risk of Modern Slavery in Greencell's business and supply chains.

4. Supply Chain

Greencell has built long-term relationships, greater than 10 years, with many suppliers throughout the world to include South America, Africa and Europe. All products are sourced from approved nominated suppliers who pass Greencell's stringent supplier approval verification process and meet Greencell's high ethical expectations and standards within their own supply chains.

5. Greencell Policy on Forced Labour

Greencell is committed to ensuring that there is no modern slavery or human trafficking within the supply chains or in any part of the business. Greencell's modern slavery policies and procedures reflect Greencell's commitment to acting ethically in all business activities and relationships. The policies and procedures are based on universally recognised standards such as the ETI Base Code, UN Guiding Principles on Human Rights and the UK Modern Slavery Act (2015)

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Greencell is a "Full Member" of the Ethical Trading Initiative (ETI), A&B member of The Supplier Ethical Data Exchange (Sedex), Members of Assured Labour Providers (ALP) and Members of Sustainability Initiative of South Africa (SIZA).

"Stronger Together" and "Unseen - Recognise and Report Modern Slavery" App posters are posted in Greencell pack house canteen along with a Labour Provider whistle blowing hotline poster. Greencell also has a Whistleblowing Policy which is detailed in the Employee Handbook. At induction all Greencell employees are shown a "Modern Slavery DVD". Greencell also requires its Labour Providers to follow the same induction process.

Greencell has written robust policies and procedures describing how Greencell identify, evaluate and address modern slavery, to include;

- Ethical Policy
- Supplier Ethical Policy
- Anti-Bribery and Corruption Policy
- Health and Safety Policy
- Whistleblowing policy
- Equal Opportunities policy
- Preventing Unseen Labour Exploitation Policy
- Modern Slavery Guidance procedure
- Policy on Forced Labour within the supply chain
- Positive Work Environment Policy
- Recruitment Procedure
- Child Labour Policy

6. Due Diligence and Risk Assessment

Greencell's vision is for workers to be fairly treated and rewarded in working conditions that are safe and secure with the freedom to develop and grow their careers. Greencell aims to achieve this by working in close collaboration with its own growing operations, Westfalia Fruit, and long-term partner growers; clearly communicating the ETI base code requirements in a targeted fashion in line with the company's short, medium and long-term ethical objectives, as described in Greencell's ethical strategy. Greencell's ethical strategy has been developed following a thorough risk assessment of its supply base. An overall ethical RAG rating informs what actions need to be taken where for the benefit of the employees whether temporary or permanent within the supply chain.

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Greencell's ethical, technical and buying teams meet formally with key suppliers, at least annually, to specifically discuss human trafficking and worker welfare in their supply chain. The CSR Manager and the Technical Team will visit the supplier's premises; providing an opportunity to observe "business ethical activities, working conditions and carry out worker interviews to ensure suppliers are not breaching the ETI Base Code or Modern Slavery Act.

Greencell conduct careful assessments of prospective new supply chain partners to ensure that they meet the obligations set out in the ETI Base Code, UN Guiding Principles on Human Rights and the Modern Slavery Act.

Greencell keeps abreast of salient human rights issues by continuously monitoring the potential human trafficking risks within the supply chain and being active participants within the (ETI) Ethical Trading Initiative and Stronger Together Roadshows and Workshops.

7. Supplier Adherence to Our Values and Ethics

Greencell operates a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business activities and operations. Greencell is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within its supply chain by exercising strong policies and procedures as part of a robust, developing, due diligence framework.

In accordance with section 54(4) of the Modern Slavery Act 2015; Greencell works with first-tier suppliers to ensure slavery and/or human trafficking is not taking place within their own supply chains. Each supplier signs Greencell's "Policy on Forced Labour within the supply chain" demonstrating their commitment to identifying and eradicating anti-slavery and human trafficking.

Greencell is committed to carrying out business with suppliers who are working to ensure continuous improvements are made within their own operations and that of their supply chain.

Greencell Labour Providers are audited annually by a 3rd party to ensure pre-employment checks have been obtained for all agency workers.

The CSR Manager attends specific modern slavery training carried out by the GLAA, conducts worker interviews, throughout the year, to ensure agency staff members have not been coerced.

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8. Training on modern slavery and trafficking

All of Greencell employees receive awareness training in relation to Modern Slavery, employees who have a direct responsibility and involvement with the engagement of workers receive comprehensive modern slavery training.

9. Embedding the principles

During 2018-19, Greencell will/have undertaken the following activities.

- The Essentials of Ethical Trade training presented by the ETI (Ethical Trading Initiative) for all key Greencell personnel.
- Bribery and Corruption online training for all managers at Greencell.
- UK Competition Law training for the Senior Management Team at Greencell.
- Key personnel attend Stronger Together - "Tackling Modern Slavery in UK Businesses" workshop and Stronger Together – "Tackling Modern Slavery in Global Supply Chains".
- Sedex training and Sedex Risk Assessment training for new employees.
- Sedex training on Sedex Forced Labour indicators for new employees.
- Stronger Together Training for South African growers.
- NGO sponsorship delivering "Ethical Trade Awareness Training" for Small-Scale farmers in East Africa.
- Ongoing work with Mexican growers exploring alternatives to labour providers.

This statement has been approved by Greencell's Managing Director and is made in accordance with Section 54(1) of the Modern Slavery Act 2015.

Managing Director: Graham Young

Signed:

A handwritten signature in black ink, appearing to be "G. Young", written over a horizontal line.

Greencell Ltd:

Date:

25TH SEPTEMBER 2018.