



Modern Slavery and Human Trafficking Policy




GRAYSONS

Modern Slavery and Human Trafficking Policy Statement

Our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the legislation.

We are a responsible and ethical business committed to sustainable food and fair working practices.

Our Procedures

We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

- We have a robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and security checks to ensure everyone employed is 16 and above
- Market-related pay and rewards reviewed annually
- Wellbeing activities and initiatives to support our people's physical and mental wellbeing and lifestyle choices

Our Policies

Graysons' operational policies related to respecting, protecting and remedying the human rights of all those who work on behalf of Graysons, as well as related supplier policies that support action on modern slavery are:

- Responsible Sourcing Policy
- Human Rights Policy
- Environmental Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Health and Safety Policy
- CSR Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- Recruitment/Agency workers policy

Training

We aim to provide training for our procurement team and the programme is designed to raise awareness of the issue of slavery and human trafficking and to help identify and mitigate potential risks from our supply chain.

- How to assess the risk of slavery and human trafficking
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected

- How to escalate potential slavery or human trafficking issues
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios.

Due Diligence for Suppliers

All Graysons suppliers and subcontractors are expected to apply the principles of the Modern Slavery Act 2015 and Ethical Trading Initiative, as well as our standard terms and conditions of supply.

Our supplier approval process incorporates a rigorous review of the controls undertaken by the supplier and a risk-based assessment of their policies and practices. Prior to nominating suppliers our Commercial Director audits the supply chain thoroughly. Our supply base is then monitored for continued adherence through an annual 'due diligence' questionnaire.

We understand that our suppliers often have their own complex supply chains, which makes it difficult for us to directly monitor or control the working conditions of each individual entity within a supply chain. We make it clear to our suppliers that they have a responsibility to ensure that their own supply chains remain free from abuse.

The company directors and senior management have responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within our supply chain.

Our Managing Director, Tim O'Neill, has Board responsibility for legal compliance.



Signed: Tim O'Neill

Position: Managing Director

Date: 05/01/2024