



FRESH HUB GROUP

Tackling Modern Slavery & Preventing Hidden Labour Exploitation Policy

Version 4.0 | February 2026

Review: Annual

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Document Control		
Version	Date	Summary of changes
4.0	Feb 2026	Comprehensive refresh aligned to Modern Slavery Act 2015 s.54; Home Office Statutory Guidance (v4.4, 2025); TISC (2025); GLAA standards.
3.0	Jan 2026	Revised policy and recruiter appendix
2.0	Aug 2022	Initial Group policy and recruiter compliance form

1. Purpose & Commitment

Fresh Hub Group (“FHG” or “the Group”) is committed to respecting internationally recognised human rights and preventing all forms of modern slavery, forced labour, human trafficking and hidden labour exploitation across its operations and supply chains.

We recognise that adverse human rights impacts may arise not only from labour practices, but also from environmental harms. Environmental conditions such as heat stress, water scarcity, unsafe chemical exposure, pollution and climate-related risks can directly and indirectly affect the health, safety, dignity and livelihoods of workers and communities connected to our business.

We recognise that fair, legal and ethical treatment of workers is fundamental to building a resilient and sustainable business.

FHG therefore operates a zero-tolerance approach to modern slavery and is committed to:

- Protecting the dignity and safety of all workers
- Preventing exploitation in recruitment and employment
- Identifying and addressing risks proportionately
- Escalating and remediating severe human rights violations

This policy is designed to support compliance with:

- The UK Modern Slavery Act 2015
- The UN Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance
- ETI Base Code principles

2. Scope

This policy applies to all Group-controlled entities and applies proportionately to joint ventures and associated businesses:

- All Fresh Hub Group employees
- All Group sites and operations
- All suppliers, growers, labour providers, agents and subcontractors
- Particular attention is given to higher-risk areas, including:
 - Seasonal and migrant labour
 - Labour-intensive agricultural production
 - Third-party recruitment agents
 - High-risk geographies

The policy applies to all permanent, temporary and agency workers engaged by the Group

This policy underpins the Group's annual Modern Slavery Statement, and disclosures are informed by the policy's HRDD cycle

3. Legal & Policy Framework

Fresh Hub Group's approach to preventing modern slavery and hidden labour exploitation is grounded in applicable legislation, recognised international standards and defined internal governance structures.

This policy supports compliance with:

- The **UK Modern Slavery Act 2015 (Section 54)**
- The **Home Office Statutory Guidance on Transparency in Supply Chains**
- The **Transparency in Supply Chains (TISC) 2025 requirements**, where applicable
- Relevant standards and expectations of the **Gangmasters and Labour Abuse Authority (GLAA)**

The Group's approach is also aligned with the:

- **UN Guiding Principles on Business and Human Rights (UNGPs)**
- **OECD Due Diligence Guidance for Responsible Business Conduct**
- **ETI Base Code principles**

4. Definitions & Indicators

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking.

Hidden labour exploitation includes exploitation of job applicants or workers by third parties, including:

- Recruitment fees or debt bondage
- Coercion linked to accommodation or transport
- Retention of identity documents
- Restriction of movement
- Threats, intimidation or abuse
- A severe human rights violation includes actual or potential impacts that cause serious harm, are life-threatening, irreversible, systemic, or affect vulnerable groups, including adverse impacts arising from environmental conditions where such impacts materially affect worker health, safety or dignity.

5. Governance & Responsibility

- The **Managing Director** holds overall accountability for the effectiveness of this policy.
- The **Head of HR** has day-to-day oversight and implementation, including oversight of recruitment controls and coordination of investigations.
- The **Sustainability, Technical and Operational teams** support risk identification, supplier engagement and monitoring.
- Managers and supervisors are responsible for applying this policy in practice and escalating concerns.
- All employees have a duty to report concerns and suspected breaches.
- The policy is reviewed annually and supported by Board-level oversight through ESG and risk governance processes.
- The Board receives periodic oversight of modern slavery and human rights risks through established governance processes, including review of significant incidents and policy updates.



6. Human Rights Due Diligence (HRDD)

FHG operates a risk-based HRDD approach:

- **Identify**
Assess actual and potential risks across operations and supply chains, including environmental conditions affecting workers.
- **Assess**
Evaluate risks based on severity, likelihood and vulnerability of affected groups.
- **Prevent & Mitigate**
Implement recruitment controls, supplier expectations, training and corrective actions.
- **Monitor & Track**
Use audits, supplier engagement, grievance data and management review.
- **Review & Improve**
Update actions annually and where risk profiles change.

7. Recruitment & Labour Provider Controls

FHG commits that:

- Employment is freely chosen.
- No worker pays recruitment fees.
- Only authorised labour providers are used.
- Subcontracting without approval is prohibited.
- No worker shall be required to surrender passports or identity documents.
- Recruiters must sign and comply with Recruiter Compliance Principles.
- Recruitment practices are overseen by HR and subject to periodic review.

8. Working Conditions, Wages & Welfare

- Payment of wages in accordance with legal requirements and provision of transparent payslips.
- Safe and hygienic workplaces, supported by appropriate risk assessments and first aid arrangements.
- Private worker interviews, welfare discussions and structured feedback mechanisms.
- Equal treatment and respect for freedom of association.



9. Supplier Expectations

Suppliers must:

- Comply with applicable labour and human rights laws
- Provide evidence of compliance where reasonably requested.
- Align with ETI Base Code principles
- Prohibit forced labour and child labour
- Provide safe and hygienic working conditions
- Respect worker dignity and non-discrimination
- Ethical trade and human rights expectations are embedded in:
 - Supplier onboarding
 - Tender processes
 - Terms and Conditions
- Serious or unresolved breaches may result in suspension or termination.

10. Environmental Conditions & Worker Wellbeing

FHG recognises that environmental risks can create human rights harms. As part of its human rights due diligence, the Group considers:

- Heat exposure and rest breaks
- Access to safe drinking water
- Chemical handling and protective equipment
- Air quality and sanitation
- Environmental practices affecting worker health or community livelihoods
- These considerations are addressed proportionately through supplier engagement, source visits and risk assessment.

11. Training & Awareness

FHG provides mandatory annual training to managers, HR personnel and recruiters.

- Induction for all workers
- Toolbox talks during seasonal peaks; multilingual materials
- Relevant employees receive training on:
 - Modern slavery awareness
 - Recruitment controls
 - Recognising indicators of exploitation
 - Escalation responsibilities

Suppliers are expected to cascade awareness within their operations.

12. Speak Up & Reporting Channels

- Internal – line manager; HR; whistleblowing.
- External – Modern Slavery Helpline 08000 121 700; GLAA; Police 999; Home Office portal.
- The mechanism is accessible to supply chain workers where appropriate.
- Non-retaliation – confidentiality and protection.
- Concerns may be raised confidentially or anonymously.

13. Investigation, Escalation & Remediation

Investigations will normally follow these stages:

- Initial triage and safeguarding of affected workers
- Evidence gathering and confidential interviews
- Escalation to relevant authorities where required, including the GLAA, Police or the National Referral Mechanism (NRM)
- Implementation of corrective action plans (CAPs)
- Remediation for affected workers, including repayment of fees, wage corrections or safe accommodation where relevant

14. Grievance & Escalation

- FHG operates a Human Rights & Ethical Trade Grievance Mechanism aligned to the UNGP effectiveness criteria.
- Concerns may be raised confidentially or anonymously through:
 - Line management
 - HR
 - Whistleblowing channels
 - Designated reporting email
- All grievances are:
 - Logged and assessed
 - Investigated proportionately
 - Escalated where necessary
 - Tracked to closure
- Where severe human rights violations are identified, the **Severe Human Rights Violations & Remediation Protocol** is triggered, which may include:
 - Immediate safeguarding



- Senior management escalation
- Supplier corrective action plans
- Engagement with authorities (e.g. GLAA)

- Victim support and remediation
- Termination of supplier relationships will be considered only where remediation is not possible or where there is failure to engage in corrective action.

15. Monitoring, KPIs & Reporting

Effectiveness is monitored through:

- Grievance log review
- Recruitment compliance checks
- Supplier corrective action follow-up
- Periodic management reporting
- Where appropriate, metrics may include:
 - Training completion rates
 - Grievance resolution timelines
 - Corrective action closure rates
- This supports continuous improvement rather than box-ticking compliance.
- Findings are reviewed periodically at management level.
- Findings inform risk assessment updates and continuous improvement actions.

Significant incidents and thematic risks are escalated to senior management and, where appropriate, the Board.

16. Data Protection & Record Keeping

Investigations and worker data are handled in accordance with applicable UK data protection legislation. Access is restricted to authorised personnel and records are retained in line with the Group's retention schedule.

17. Non-Compliance & Disciplinary Actions

Failure by employees to comply with this policy may result in disciplinary action, up to and including dismissal for gross misconduct.



Suppliers or labour providers found to be in breach may be subject to suspension, termination and/or reporting to relevant authorities.

18. Review & Continuous Improvement

FHG recognises that maturity in human rights due diligence is a journey.

The Group currently operates at a **Foundation level** of maturity and is committed to strengthening governance, supplier engagement and monitoring capability over time, proportionate to risk and business scale.

The Group is progressing towards enhanced supplier performance evaluation and risk-based oversight.

19. Approval

This policy is approved by the Board of Fresh Hub Group and is reviewed annually.

Managing Director: Robert Landymore

Approval Date:

Version No Ref:

Appendix A – Recruiter Compliance Principles

- Sign before activity
- Approved channels & locations only
- No gifts/loans; declare conflicts
- No ID retention; lawful data handling
- Ensure language understanding; no contract substitution
- No accommodation/transport without HR approval
- Authorised shift allocation only
- Immediate escalation of suspicions
- Annual training; accurate records



RECRUITER COMPLIANCE PRINCIPLES

Appendix A

(Any individual undertaking recruitment for a Fresh Hub Group position must sign a copy of this form and return it to either the Head of HR or their Line Manager before interviewing any applicants. The form is to be stored on the individuals' personal file.)

Recruiters Name _____

- 1 Sign this document before interviewing any applicants.
- 2 Only interview applicants in an approved location.
- 3 Not allow applicants to complete registration documents on behalf of others.
- 4 Not accept money, favours or any gifts at all from applicants or workers.
- 5 Not loan any personal money to temporary workers.
- 6 Notify the Head of HR or their Line Manager when informed by an applicant or worker that they have paid money to be introduced to the Company.
- 7 Not allow an unauthorised agent or individual to introduce job applicants to the Company.
- 8 Notify the Head of HR or their Line Manager when suspecting an individual of introducing job applicants to the Company for personal gain.
- 9 Not act as a landlord or be involved in the provision of accommodation, transport or other paid for services to workers without prior authority from the Head of HR or your Line Manager.
- 10 Not allow anyone other than an authorised person to choose which workers are selected for work shifts.
- 11 Not force or coerce temporary workers to work against their will.
- 12 Not threaten or subject workers to physical or mental mistreatment.
- 13 Treat all applicants and workers with dignity and respect.
- 14 Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to the Head of HR or Line Manager immediately.

I confirm I understand the responsibilities outlined herein and will comply accordingly.

Recruiter's Signature: _____ Date: _____

I have checked and confirm that the Recruiter understands the above principles.

Manager's Signature: _____ Date: _____