



## **MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT For Financial Year Dec 24 – Nov 25**

### **1. Introduction**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Fresh Hub Group (“FHG” or “the Group”) has taken during the financial year 1 December 2024 to 30 November 2025 to prevent modern slavery and human trafficking in its operations and supply chains.

This statement applies to Fresh Hub Group as the legal reporting entity and covers all Group-controlled businesses operating during the reporting period.

Fresh Hub Group has a zero-tolerance approach to modern slavery, forced labour, human trafficking and hidden labour exploitation. We are committed to operating in a manner that protects the dignity, safety and wellbeing of all workers connected to our business.

### **2. Our Structure, Business & Supply Chains**

Fresh Hub Group is a UK-based fresh produce group operating across multiple sales and sourcing channels. The Group sources, imports and distributes fresh produce through a network of growers, packhouses, service providers and logistics partners.

The Group sources produce from suppliers located across Europe, Africa, Asia and the Americas through a network of growers, producer groups and service providers. Given the nature of global agricultural supply chains, we apply a proportionate risk-based approach to oversight and engagement with suppliers.

Our supply chains include:

- Growers and producer groups (UK and international)
- Packhouses and processing facilities
- Logistics and transport providers
- Labour providers and agencies
- Service providers supporting operations

Given the nature of agricultural and labour-intensive supply chains, we recognise that certain areas may present heightened risks, particularly where seasonal labour, migrant workers and high-risk geographies are involved.

### 3. Our Policies in Relation to Modern Slavery

During the reporting year, FHG has strengthened its policy framework to support a structured approach to human rights and modern slavery risk management.

Key policies include:

- **Tackling Modern Slavery – Preventing Hidden Labour Exploitation Policy (January 2026 revision)**
- Ethical Trade Policy
- Procurement Policy
- Supplier Code of Conduct
- Human Rights & Ethical Trade Grievance Mechanism

Our Modern Slavery Policy explicitly recognises that adverse human rights impacts may arise not only from labour practices but also from environmental harms, such as heat stress, unsafe water access or chemical exposure, which can affect worker health and wellbeing.

These policies are reviewed at least annually or where risk profiles change and are communicated to relevant employees and suppliers.

### 4. Due Diligence Process

FHG operates a risk-based approach to human rights due diligence, aligned with the UN Guiding Principles on Business and Human Rights.

During the reporting period, the Group has:

- Embedded ethical trade and human rights requirements into supplier onboarding and tendering processes
- Required suppliers to acknowledge our ethical trade and modern slavery expectations
- Encouraged participation in recognised platforms such as Sedex where appropriate
- Implemented a structured **Human Rights & Ethical Trade Grievance Mechanism**, accessible to employees and relevant supply chain stakeholders
- Strengthened internal recruitment controls and recruiter compliance principles
- Introduced grievance logging and escalation procedures, including a protocol for severe human rights violations and remediation
- This approach is designed to identify, assess, mitigate and monitor risks proportionately.

Risk identification and assessment inform supplier engagement priorities and internal governance review.

### 5. Risk Assessment and Management

Through our engagement with FNET and internal review processes, we have identified key areas of potential modern slavery and human rights risk, including:

- Use of seasonal and migrant labour
- Labour-intensive agricultural production
- Recruitment practices involving third-party agents
- Environmental conditions that may impact worker health (e.g. heat exposure, water access)

Risk mitigation measures include:

- Supplier engagement and dialogue
- Review of available audit or self-assessment information.

- Where available, the Group reviews third-party ethical audit reports and supplier self-assessment information to support risk assessment and engagement.
- Escalation of serious concerns through defined governance routes
- Application of a Severe Human Rights Violations & Remediation Protocol where necessary

Where risks are identified, we prioritise remediation and corrective action over immediate disengagement, unless there is a failure to cooperate or serious unresolved breaches.

Risks are reviewed periodically as part of the Group's HRDD cycle and governance processes.

## **6. Grievance Mechanisms and Remedy**

FHG recognises that access to effective grievance mechanisms is central to preventing and addressing modern slavery.

During the reporting year, we implemented a **Human Rights & Ethical Trade Grievance Mechanism**, aligned with the UN Guiding Principles. This mechanism:

- Is accessible to employees, agency workers and relevant supply chain stakeholders
- Allows confidential and anonymous reporting where appropriate
- Provides structured investigation, escalation and remediation processes
- Includes provisions for severe human rights violations
- Grievances are logged, reviewed and used to inform risk assessments and continuous improvement.
- Significant cases are escalated in line with defined governance procedures.

## **7. Training and Awareness**

FHG requires relevant employees to complete periodic training appropriate to their roles and provides training and awareness including induction awareness and management responsibilities in recognising and escalating concerns.

- Recruitment controls and prevention of hidden labour exploitation
- Ethical trade and modern slavery awareness
- Management responsibilities in identifying and escalating concerns

Recruiters are required to adhere to defined compliance principles, including prohibition of recruitment fees and inappropriate third-party involvement.

## **8. Effectiveness and Continuous Improvement**

During the reporting period, FHG has focused on strengthening governance and embedding policy into practice.

Improvements include:

- Clearer ownership of human rights and modern slavery responsibilities
- Introduction of grievance logging and review processes
- Strengthened procurement controls at onboarding and tender stage
- Development of supplementary protocols addressing severe human rights risks

We recognise that maturity in this area is a journey. The Group currently operates at a Foundation level of maturity and has made measurable progress during the reporting

period, with a structured roadmap for further strengthening supplier oversight and governance.

Over the coming reporting periods, Fresh Hub Group will focus on:

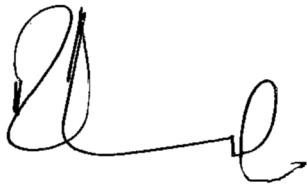
- Strengthening supplier engagement and transparency
- Further embedding grievance mechanisms across relevant stakeholders
- Continuing to refine risk assessment and monitoring processes
- Supporting suppliers in developing effective worker voice mechanisms

### **9. Governance and Approval**

Responsibility for the implementation and oversight of the Group's modern slavery and human rights commitments sits with senior management, supported by HR, procurement and sustainability functions.

This statement has been approved by the Board of Directors of Fresh Hub Group and will be reviewed annually and published on the FHG website.

Signed for and on behalf of Fresh Hub Group:

A handwritten signature in black ink, appearing to read 'R. Landymore', with a long horizontal stroke extending to the right.

Robert Landymore  
Managing Director  
Fresh Hub Group

Date: 17/04/2026\_\_\_\_\_

During the reporting year, no confirmed instances of modern slavery were identified within our own operations