



# MODERN SLAVERY STATEMENT

## A) ORGANISATION

This statement applies to Griffin & Brand (European) Ltd of company registration no 900348 (referred to hereafter as 'Griffin & Brand'). The information included in the statement refers to the financial year 2018/2019

## B) ORGANISATIONAL STRUCTURE

Griffin and Brand is a limited liability family run business with one site within the UK in Ashford Kent. Griffin and Brand is owned by Chairman Antony Elliott with his Son Mark Elliott as Managing Director. The Company's main operation is the global import of table grapes for supply to our UK customers. We source from South Africa, Chile, India, Egypt, Spain, Italy, Greece, Brazil, and Peru. Harvesting of table grapes is seasonal work and some of the countries we source from have lower labour standards than that of the UK. Therefore Griffin & Brand accept that there is increased risk within our supply chain. All labour supplied to Griffin and Brand directly is supplied in the UK

## C) DEFINITIONS

Griffin & Brand considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.
- Domestic servitude

## D) COMMITMENT

Griffin & Brand acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Griffin & Brand understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Griffin & Brand does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Griffin & Brand in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Griffin & Brand strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom or the ETI Base code which ever affords the employee greater protection.

## E) SUPPLY CHAINS

In order to fulfil its activities, Griffin & Brand's main supply chains include those related to the growing, harvesting and packing of fresh table grapes from South Africa, Chile, India, Egypt, Spain, Italy, Greece, Brazil and Peru. We understand that the harvesting of table grapes is seasonal work which may involve the use of labour providers by our supply chain

## F) POTENTIAL EXPOSURE

Griffin & Brand considers its main exposure to the risk of slavery and human trafficking to exist within its supply chain as this involves seasonal work in countries where either workers' rights or enforcement of those rights are not as rigorous as within the United Kingdom

In general, Griffin & Brand considers its exposure to slavery/human trafficking to be relatively limited due to the steps it has taken to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## G) STEPS

Griffin & Brand carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Griffin & Brand has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Griffin & Brand has taken the following steps to ensure that modern slavery is not taking place:

- Temporary labour used is through a contracted GLAA Licensed labour provider
- Griffin & Brand audit our provider annually
- Key Staff have received stronger together training to help identify potential signs of modern slavery.
- Our supply base must be either be Sedex registered or have a 3<sup>rd</sup> party ethical audit
- Suppliers are risk assessed and high risk suppliers must have a 3<sup>rd</sup> party ethical audit.
- Suppliers are issued our code of practice which includes an ethical policy and must agree to adhere to it before they can supply

Griffin & Brand want to continually improve its position with regards to modern day slavery and has identified the following to enable it to do so.

- Become an associate member of stronger together  
Griffin and Brand will become an associate member of Stronger together. We will upload all of our policies and procedures onto the stronger together website. This will allow greater transparency in what we do.
- Raise awareness within the supply chain  
Griffin and brand will put additional requirements on our suppliers to raise awareness within our supply chain for the suppliers and any potential victims working for them.

Griffin and Brand will report on its progress with the above on its 2019/2020 annual statement.

#### **H) KEY PERFORMANCE INDICATORS**

Griffin & Brand has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Griffin & Brand or its supply chains.

- Labour provider audits by Griffin & Brand
- Sedex self-assessment and 3<sup>rd</sup> party audits for Griffin & Brand's Site
- Supplier Sedex self-assessment and 3<sup>rd</sup> party audits

#### **I) POLICIES**

Griffin and Brand has the following statements/policies which further define its stance on modern slavery.

- Statement of ethical practice
- Policy on employment of young people in the UK

#### **J) SLAVERY COMPLIANCE OFFICER**

Griffin & Brand has two Slavery Compliance Officers, Jeremy Barnes for UK Operations and James Taken for Suppliers, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to Griffin & Brand's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed  Managing Director

Date: 20/08/19