



MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to Griffin & Brand (European) Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2020/2021.

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 the 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.

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 at least 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) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for Griffin & Brand, as it did for others across the nation.

Griffin & Brand welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, Griffin & Brand remains in a position to publish its statement for the financial year 2020/2021 in line with the original publishing requirements.

Griffin & Brand concludes that the COVID-19 pandemic did adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above. Labour shortages at our supplier's sites did occur during the pandemic and any form of labour shortage increase the risk of workers being used, which could be considered a victim of modern-day slavery. To reduce the risk Griffin & Brand kept in close contact with our suppliers and where issues with labour were identified Griffin and Brand changed our requirements to less labour intensive options. An example would be changing a requirement for punnet grapes to a 10kg bulk pack instead. Griffin & Brand feels reducing the labour requirements where issues were reported helped to reduce the risk associated with a labour shortage.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking. Griffin & Brand took the decision from the outset of the pandemic to ensure that the entire workforce who were required to self-isolate in accordance with public health guidelines continued to receive full pay during their absence.

Griffin & Brand's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

H) 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
- Griffin & Brand are a Stronger Together Business Partner
- Key Staff have received stronger together training to help identify potential signs of modern slavery.
- Stronger together questioners are frequently given to staff members to help identify potential modern-day slavery
- Our supply base must be either be Sedex registered or have a 3rd party ethical audit
- Suppliers are risk assessed and high risk suppliers must have a 3rd 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

In our 2019/2020 statement we identified the two areas to improve these were

- improve our supplier code of practice and increase requirements relating to the prevention of modern day slavery

We improved our code of practice with a new section dedicated to modern-day slavery.

- work with supplier sites that are identified as higher risk on Sedex and help them to improve the policies and procedures to reduce the risk to their site

We have worked with suppliers identified as high risk however more work needs to be done in this area. We have seen a large increase in throughput at our site, which has resulted in more supplying sites so further work to strengthen our supply base is needed

We will report on the progress of the above in our 2021/2022 Statement

I) 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 3rd party audits for Griffin & Brand's Site
- Supplier Sedex self-assessment and 3rd party audits

J) POLICIES

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

- Policy –Business Ethics
- Statement of ethical practice
- Policy on employment of young people in the UK
- Policy – Tackling Modern Slavery

K) TRAINING

Griffin & Brand provides the following training to staff to effectively implement its stance on modern slavery

- Stronger together induction training for all staff members on how to spot signs of modern-day slavery
- Managerial policy training for all policies in relation to modern-day slavery.
- Stronger together workshop training for key members of staff

L) 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: 25/06/21

Griffin & Brand