

Modern Slavery Statement J.O. Sims 2023

INTRODUCTION

Modern Slavery is a crime with traumatic consequences for those who suffer such exploitation. It is the responsibility of everyone to be alert and vigilant in identifying both the risks and the signs of modern slavery. J.O. Sims Ltd. is committed to continually improving our awareness, understanding and practices of modern slavery and human trafficking, working with our suppliers to combat slavery like practices within our supply chains. Where occurrences are identified J.O. Sims will report the matter to the GLAA (Gang Masters and Labour Abuse Authority) or Police in the UK and with the appropriate authorities within our supply chains internationally.

STRUCTURE

J.O. Sims Ltd is a family owned business dating back over 125 years with a long and successful history in fresh produce with a turnover in excess of £95 million. J.O. Sims has carefully selected and aligned with growers and suppliers across 22 countries, who share our values of quality, value, safety, sustainability, integrity and innovation. In a number of cases J.O. Sims has joint ventures internationally which it is closely aligned with and committed to.

J.O. Sims Ltd is a UK importer, grower, packer, blender and marketing agent of fresh fruits including fresh cherries and cranberries and dried fruits and nuts such as dates and mango. Head office is based at Pudding Lane, Pinchbeck, Spalding which is also the main UK packing site from where produce and products are distributed nationally to a range of customers including retailers, food manufacturers and wholesale markets.

The business has over 150 employees and utilises three labour providers (who are required to be licensed by the GLAA) to meet additional demands. The business operates all year round with seasonal peaks in demand in January and June/July.

J.O. Sims Ltd works with a number of suppliers locally in the UK and internationally in both Northern and Southern hemispheres in the supply of:

- Fresh fruit
- Dried fruit and nuts
- Distribution services
- Contracted services
- Packaging

In addition to the Pudding Line site, Sims has direct packing operations in Poland, Spain and South Africa. The Pudding Lane site also undertakes 3rd party packing for other fruit businesses locally and for a cereal manufacturer.

Policies

J.O. Sims Ltd is committed to ensuring no modern slavery, human trafficking, discrimination or harassment or breaches of human rights are taking place in any part of our business or in our supply chains but recognise this is a considerable task with differing levels of risk depending on country and business activity.

The Company's Ethical Trading and Human Rights policy reflects our commitment to acting with integrity in all our business relationships and transactions. J.O. Sims also has a separate Modern Slavery and Human Trafficking policy, anti-bribery and corruption, whistleblowing and grievance policies in place which are updated as required.

These policies can be found on the Staff Intranet called Sharepoint and are issued on request to employees. Employees are introduced to many parts of these policies whilst going through their induction on starting with the business in addition to annual refreshers.

J.O. Sims internal policies and procedures are available to all employees via the following mediums; Staff Intranet (Sharepoint), HR department and further communicated during formal induction and employee training.

Labour Provider (Agency) management

The Labour Providers engaged by J.O. Sims at Pudding Lane must be registered with the Gangmasters and Labour Abuse Authority (GLAA). In addition, Sims conducts Labour Provider

audits twice a year with the agency and any actions from these audits are set out clearly for the Labour Provider to correct.

Where the Labour Provider consistently fails to comply with these corrective actions or in the case where they would lose their GLAA licence then J.O. Sims reserves the right to terminate their contract immediately. File checks and interviews are also conducted with employees of the Labour Providers in the Labour Provider audit. Where any critical non-compliance is uncovered, they will be reported to the GLAA.

The agency audit includes but is not limited to checking:

- GLAA license status
- Policies on human trafficking, minimum working hours, minimum age of workers and young workers, equal opportunities, anti-bribery and corruption.
- Grievance and complaints procedure for employees
- Ensuring employees are not required to pay any working finding fees or fees associated with other services such as medical checks or translation of documents or for PPE.
- Proof of identity and age of workers
- Proof of work contracts
- Proof of accurate and full payslips
- Ensuring that employees receive the NMW/NLW
- Training with Stronger Together has been undertaken

At J.O. Sims, posters of the ETI Base Code and the Modern Slavery Helpline are displayed in communal areas and in the company washrooms. Stronger Together literature, including multi language posters and helpline numbers, are in communal areas, canteens and toilets to give help, guidance and information on modern slavery and exploitation and its many forms.

HR compliance ensures that any shared bank accounts will be investigated to ensure there is a proper and legitimate reason for them. The HR team will also consider the number of employees living at single address to make sure this is sustainable and not over crowded.

The HR department also oversee the management of worker hours to ensure they are not so excessive and through this system monitor where specific individuals are undertaking more

overtime than others in order to ensure this is voluntary and not being controlled by others.

Due diligence with suppliers

J.O. Sims Ltd is an AB member of Sedex and require all suppliers to be members of the Suppliers Ethical Data Exchange (Sedex) as either AB or B members as appropriate and linked to J.O. Sims Ltd. Suppliers are expected to maintain their Self-Assessment Questionnaire (SAQ) at 100%, to update it every 6 months and to ensure that J.O. Sims Ltd have full access to it and their audits in order to aid the risk assessing process completed by the Technical team.

The Sedex Risk Assessment Tool (RAT) is used to inform the business of the risks within the supply base. The RAT categorises suppliers as either low/medium/high risk which can be addressed with suppliers either via email/telephone or on many of the national and international site visits that take place annually.

Where requested by a customer or based on the RAT, audits of suppliers will take place either as 2nd party (by a member of the J.O. Sims Ltd team) or 3rd party audits (undertaken by an approved 3rd party audit provider). Sims does not undertake unannounced ethical audits.

J.O. Sims Ltd has a third party ethical audit (SMETA) every 2 years. The last audit was in 2021 and two non-conformances were identified and closed out within the required timescale. The next audit will take place in this year (2023).

Training and capacity building

Modern Slavery Training workshops took place in early 2019 for Senior Managers and the Board and the business will endeavour to continue to attend Stronger Together training as appropriate each year. Further modern slavery training workshops are scheduled to take place in 2023.

Suppliers have been encouraged to attend Modern Slavery training workshops such as that provided by Stronger Together where available.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes J.O. Sims Ltd Modern Slavery and Human Trafficking statement for the financial year ending December 31st 2023.

This statement has been approved by the board of directors, who will review and update it annually.

Managing Director signature:

A handwritten signature in black ink, appearing to read 'C. Sims', written over a horizontal line.

Managing Director name: Christopher Sims