

Modern Slavery Statement J.O.Sims 2018

INTRODUCTION

Modern Slavery is a crime with traumatic consequences for those who suffer such exploitation. It is the responsibility of everyone to be alert to 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 100 years with a long and successful history in fresh produce with a turnover in excess of £70 million. Sims has carefully selected and aligned with growers and suppliers across 22 countries, who share Sims 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 figs, 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 100 employees and utilises labour providers (all of which are required to be licensed by the GLAA) to meet additional demands in labour. The business is year round with seasonal peaks in demand in June/July and December.

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 and Spain. Cherries are also marketed and exported to Germany. 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 or human trafficking, discrimination or harassment is 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 Responsible Sourcing Policy reflects our commitment to acting with integrity in all our business relationships and transactions. Sims also has a separate Modern Slavery and Human Trafficking policy, anti-bribery and corruption, complaints and grievance policies in place which are updated as required. These policies can be found in the Staff Handbook which is issued to all new starters.

J.O.Sims internal policies and procedures are available to all employees via the following mediums; WikiFruit - our staff intranet, HR department and further communicated during formal induction and employee training via our Staff Handbook which we endeavour to update regularly.

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 each agency and any actions from these audits are set out clearly for the Labour Provider to correct. Where a 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 licence 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. The Stronger Together Implementation checklist has been used to identify gaps in policies and procedures within the business in order to create an action plan.

HR compliance ensures that any shared bank accounts will be investigated to ensure this 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 so are not 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 are 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 2017 and no non-conformances were identified, the next will take place in 2019.

Training and capacity building

Further training and capacity building in addition to the original Stronger Together training undertaken in 2016 has been identified as an area for attention across management and the site in general due to staff changes.

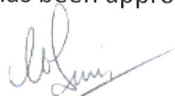
Suppliers have been encouraged to attend Modern Slavery training workshops such as that provided by Stronger Together where available.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes J.O.Sims Ltd slavery and human trafficking statement for **the financial year ending December 31st 2017.**

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

CEO's signature:



CEO's name:

Christopher Sims.

Date:

1st October 2018