

MODERN SLAVERY AND FORCED LABOUR STATEMENT



Transparency in Supply Chains (TISC) November 2021.

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This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 which establishes and reviews our slavery and human trafficking policy for the past year and looks forward to the challenge of the next financial year. The statement has been approved and signed off by the Strawson’s management board.

The Company, its Ethos and Composition:

Strawson Ltd is an active, family-based company incorporated in August 2001 with its registered office located at Bilsthorpe, Nottinghamshire. Its business is the production of vegetable crops and cereals which it grows and markets. Its main clients are the major UK Supermarkets.

Strawson Ltd has fully recognised and sought to identify and eliminate the increasing evidence of modern slavery within agriculture and its related industries. It is determined to ensure that there is no risk or toleration of modern slavery or human trafficking, in its own business or in its supply chains, and that its staff are properly trained and alert to the dangers and can report it properly if encountered.

There are 86 permanent staff, divided between field operations, packhouse and administration. Our supply chain consists primarily of labour providers¹ for packhouse work. Dependent upon needs, the number used varies between 50 to 150 at peak times.

Well established Spanish and French sources are occasionally used also for

¹ *Gangmasters* as defined under the Gangmasters Licensing Act 2005

importation of crops at certain times of the year.

Dealing with the Risk:

Nevertheless, agency labour remains potentially the main source of risk for human slavery within our supply chain and thus is subject to particular scrutiny. This is not to exclude equal vigilance within our own directly employed staff, however.

Labour providers are carefully chosen and each of them subject to yearly inspections by a consultant, not only to ensure compliance with the terms and standards of the Gangmasters and Labour Abuse Authority licence, but also to monitor and observe any points of concern for workers' welfare. This is done through worker interviews and direct contact as well as by established inspection procedures.

We are also audited by our clients, particularly the supermarkets, for ethical and compliance matters. We work with [SEDEX](#) and are audited against [SMETA](#) standard and follow the Ethical Trading Initiative ([ETI](#)).

The Service Level Agreement (SLA) between our labour providers and the company includes an assurance of their awareness of modern slavery and an obligation to follow our own guidance and zero tolerance towards any form of abuse. They must also report any concerns. These will be discussed at our daily packhouse management packhouse meetings.

This is further evidenced by the presence of our agents on site to oversee and observe workers whose behaviour might indicate any personal problems, or signs of slavery, bullying or human trafficking and for which

training has been given. This liaison initiative has proved invaluable.

Similarly, we review our entire supply chain periodically and we expect all agencies to have in place recruitment and other policies which are free from bias, discrimination and those elements which might encourage or allow modern slavery. This is contained within the SLA, any breach of which, especially in this regard, is considered serious enough to review the agencies' continued contract. As well as the GLAA Standards, we use the [ETI base code](#), which is widely known and respected, as a template for our scrutiny.

All of our growers have terms and conditions in line with our common values and ethical aims and treatment of those who work for them. They are part of [Global GAP](#) or [Red Tractor](#).

Action:

We work closely with all staff on site, permanent or agency, to exchange information or give advice. In addition to this, all workers have access to our own staff for queries and welfare and they are encouraged to make known any concerns about working conditions or personal matters without fear of discrimination, recrimination or prejudice. We have recently put in place our whistle-blowing procedures.

Last year, we achieved our stated goals: to conduct worker face-to-face interviews to gauge opinion and awareness within our workforce and to see where further training might be required; having done so, a series of seminars was undertaken to cover all levels of staff. Networking with firms of a similar interest to our own has proved a useful channel of communication; and all procedures within the company are

being updated to include the element of Modern Slavery.

Strawson Ltd is a [Business Partner](#) in the Stronger2gether initiative. We are pleased to share our commitment to the elimination of modern slavery in this way. We work with the [Association of Labour Providers](#) (ALP) and our staff have attended their training courses and seminars.

Strawson Ltd as part of the [Ethical Training Initiative](#) are subject to their Base Code in matters of employment and ethical policies and our own in-house policies, including recruitment, procurement and the employee code of conduct. We expect a similar level of commitment from our suppliers.

Strawson Ltd has been very active in its liaison with the [GLAA](#)² (formerly GLA), based in Nottingham, since 2005, as well as with all other relevant authorities. We have put our

organisation at their service for their staff training and meetings. They are a first port of call for our enquiries. We continue to attend their periodic public meetings and seminars.

[Aims and Aspirations](#)

We have set ourselves new aims for the coming year:

1. Concentrating on our own internal staff, we shall undertake scrutiny of all aspects of their duties in the light of Modern Slavery;
2. To test and ensure that the new and robust procedures and policies are benefitting both the company and the workers.
3. To develop a bespoke training matrix to identify staff and agency needs highlighting Modern Slavery issues.

[Management Approval:](#)

This document has been approved for publication by the management board who will continue to review it annually and publish it on their website.

Signed on behalf of the board:



Signature:

Date: 18.11.2021

² Gangmaster and Labour Abuse Authority