

3.24 Winterwood Farms Limited Modern Slavery & Human Trafficking Statement

Issue 8

Year: 2025/2026

End date: 20 August 2026

This statement was approved by the Board of Winterwood Farms Ltd on 18th August 2025 and is published voluntarily in accordance with the Modern Slavery Act 2015. It outlines the steps we have taken to prevent modern slavery and human trafficking in our business and supply chains.

Modern slavery encompasses slavery, servitude, human trafficking, and forced labour. The Company has a zero-tolerance approach to any form of modern slavery.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery within the business or our supply chain.

Our business and supply chain

Established in 1978, Winterwood Farms produces a wide range of fruit from our farms in the United Kingdom, Poland, and South Africa, with nearly 2,000 hectares of combined cropping area. Our farms allow us to be one of the largest growers of Blueberries in Europe and Southern Africa.

Alongside our farming operations, we also pack fruits from around the world at our packhouse in the UK. These fruits are marketed to various retailers and supermarkets in the UK.

We purchase all our fruit from the farms on which they are grown, from our farms, or through reputable marketing agents. We have a very close, successful and long-term relationships with all our major suppliers.

Policies

The Company operates several internal policies to ensure that business is conducted ethically and transparently and we are committed to ensuring there is no modern slavery

1. Supplier and Ethical Agreement which contains detailed expectations of how we expect our suppliers to act regarding the ETI base code, Modern Slavery and Human Trafficking. The Company is committed to ethical trading and will not tolerate Human trafficking or Modern slavery in our supply chains.
2. Third Party Independent auditing. We have a program of external ethical auditing is in place including publishing the results of third-party audits on [SEDEX](#) (Supplier Ethical Data Exchange) website.
3. Worker Welfare Policy: The Company has a duty of care to all its employees. The Company conducts an extensive induction programme before employees commence work which covers Health and Safety, job descriptions, pay, food safety and human trafficking.
4. Bribery and Corruption Policy: The Company prohibits bribery or corruption in any form whether direct or indirect.
5. Human Rights Policy: The Company has a human rights policy covering employment, harassment, discrimination, accommodation, harassment in accommodation, violation of the human rights policy, and consequences.
6. Confidential Whistleblowing Policy: The Company has a confidential whistleblowing policy designed to make disclosures without fear of reprisal and in addition we also advertise several Retailer sponsored whistleblower numbers along with the whistleblowing policy of our marketing agent.

7. Equality, Diversity & Inclusion Policy: The Company has a policy not to discriminate against people and provides equal opportunities to all.
8. Forced Labour Policy: The Company has a policy against all forms of forced labour which covers prison labour, bonded labour, coercion, and child labour.
9. Recruitment Policy: This defines the processes by which the Company recruits and selects its employees.
10. Hidden Labour Exploitation Policy: The policy on the Hidden Labour Exploitation assesses risk, where the exploitation might occur and the process for reporting and supporting anyone found to have been subject to hidden labour exploitation.

Risk Assessment

The Company has risk-assessed our fruit suppliers and labour providers. This is based upon the Sedex Risk Assessment and a recognised Risk matrix relating to country. This deeper understanding has allowed the Company to evaluate specific labour risks by country that embody wherever relevant the chance of forced labour.

Due diligence

All employees at the Company's farm and packhouse in the United Kingdom are given a written contract of employment at the start of their employment.

The Company have continued using Labour Providers to provide staff to help with any labour shortages. The Company work only with registered GLAA labour providers and follows best practice guidance for ILO, ETI, and GLAA licensing standards. The Company conducts modern slavery questionnaires on an individual basis on all agency workers during induction. Staff have been trained to look for signs of Human Trafficking or Modern Slavery during induction. We also conduct annual audits on our labour providers.

The Company only uses registered GLAA labour providers, to provide any workers required under the Seasonal Worker Scheme (SWS).

The Company recognises there is scope in our supply chain for slavery and human trafficking to occur. The Company operates a supplier approval procedure for our fruit suppliers and maintains a preferred supplier list.

We conduct due diligence on all potential suppliers before allowing them to become a supplier. The Company requires all fruit suppliers to register with [SEDEX](#) (or with [SIZA](#) for South Africa) and complete the self-assessment questionnaire (SAQ). The Company assesses compliance to national and international standards, through second-party and third-party auditing to the [SMETA](#) protocol. Suppliers are required to operate according to the Ethical Trading Initiative (ETI) principles for which the Company offers support where needed.

Training and Awareness

Key members of staff have attended the [Stronger2gether](#) workshop to understand the signs of modern slavery and what to do if they suspect that it is taking place within our business or supply chain. Staff that conduct inductions and interviews have completed the [Stronger2gether](#) trafficking and modern slavery e-training course.

During induction, new staff are made aware of modern slavery using resources provided by [Stronger2gether](#). A modern slavery questionnaire is completed face to face. The modern slavery questionnaire is conducted by our trained inductors who are trained to spot signs of modern slavery. This year we increased the number of staff attending Stronger2gether training. A total of 18 staff have attended online training as of the end of July 2025.

Awareness is raised through posters and visual prompts in our employee areas.

Our progress

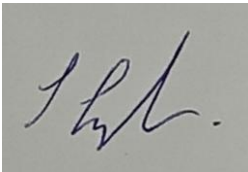
The Company will continue to work to improve our understanding of hidden labour exploitation and the Company intends to become Stronger Together Partners during 2025. We are further developing our remediation policies defining how we help staff who we identify as being subject to Human Trafficking.

Our policies: Continue to review and develop our current policies in line with emerging modern slavery and human trafficking issues.

Training and awareness: Further increase the number of staff who attend online training to identify signs of forced labour or hidden labour exploitation. Especially those that are responsible for monitoring and inducting staff into the business.

Risk Assessment: Continue to refine and develop our Modern Slavery Risk Assessment. The Company will also continue to engage with its suppliers of goods for resale on modern slavery and human trafficking risks within the supply chain.

Remediation: We have developed systems and processes to ensure that we are prepared, in the unlikely event, that we find that staff have been subjected to human trafficking or modern slavery. By having policies and procedures for what we need to do, we can better assure we are in a place to prevent, identify and to resolve issues. It is a person-centred approach with people at the heart of any process.

A square box containing a handwritten signature in blue ink, which appears to be 'S. Taylor'.

Stephen Taylor (Managing Director)

18th August 2025