

NORTHWAY MUSHROOMS LTD. - MODERN SLAVERY POLICY & PROCEDURES 2018

Introduction

This statement has been produced in accordance with the Modern Slavery Act 2015 and sets out the actions that Northway Mushrooms Ltd Group Limited will take to identify and understand potential modern slavery risks related to its business activities and supply chains. This statement relates to actions and activities during the current financial year.

Northway Mushrooms Ltd Group Limited is committed to preventing modern slavery in its business activities and its supply chains and detailed below are actions that have been implemented, and will continue to be, with the aim of fulfilling this commitment.

Policies

We are committed to the prevention of modern slavery which includes servitude, forced labour, human trafficking and child slavery. Our Modern Slavery policy is delivered through a range of associated policies and procedures:

- Ethical Code of Conduct Policy
- Staff Management Policy
- Health and Safety Policy
- Environmental Policy
- Whistleblowing Policy

Ultimate responsibility for ensuring prevention of modern slavery and for monitoring compliance to this modern slavery policy is undertaken by the Northway Board of Directors. The responsibility for monitoring of compliance within the group is that of David Dallas, Group Technical Manager.

About Northway Mushrooms Ltd Group Limited

Northway Mushrooms Ltd Group is a Producer Organisation consisting of 21 member Mushroom farms and 3 member Strawberry Farms. Farms are located both in Northern Ireland and the Republic of Ireland. Northway Mushrooms Ltd and its' members are involved in the growing and marketing of fresh mushrooms on an all year round basis and the growing and marketing of strawberries on a seasonal basis. At March 2018 the group as a whole employed 985 employees on a permanent basis on its mushroom farms and a relatively small number of less than 10 seasonal staff on its strawberry farms. The vast majority of the workforce, greater than 90%, comprise migrant labour from within the EU.

Understanding the Risks of Modern Slavery

The key direct risks of Modern Slavery identified within Northway Mushrooms group are:

- Exploitation and trafficking of migrant workers during recruitment by supply agents or other 3rd parties including...
 - employment not freely chosen
 - forced, bonded or involuntary labour
 - payments or deposits for securing employment , accommodation or other services
- Recruitment of staff not entitled to work in the country of employment.

- Exploitation of migrant workers whilst employed on farms by a 3rd party including...
 - employment not freely chosen
 - forced, bonded or involuntary labour
 - ongoing payments for securing employment , accommodation or other services
 - Under pay of employees
 - Excessive working hours
 - Poor physical working conditions, including safety conditions.
 - Bullying, discrimination and harassment during employment

To address the above risks Northway Mushrooms Ltd shall undertake the following

- Annually review with all members the group policy on preventing modern slavery in its business, ensuring that each member commits to this policy and understands their individual requirements in meeting this.
- Undertake regular training and communication events with members to ensure their awareness of modern slavery, what the risks are within their workforce and what the current industry best practice measures are to counter these risks
- Provide member growers with access to a comprehensive range of employee documentation and training materials relating to fair and safe employment. Where required these will be translated into appropriate languages to ensure understanding
- Undertake regular internal reviews with members relating to their staff employment practices to assess their compliance with Northway Mushrooms and other legal requirements.
- Encourage and assist members with undertaking regular 3rd party ethical audits to demonstrate their commitment and compliance with preventing modern slavery in its business,
- Act as an independent contact point for any group employee wishing to disclose occurrences or practices, i.e. whistleblowing, relating to unethical working practices.