

The logo for PDM, with 'P' in teal, 'D' in lime green, and 'M' in light green. The background features a dark green background with a large, dark green leaf silhouette and a white wavy line.

PDM

Modern Slavery:

Statement 23/24

A stylized lime green leaf silhouette located in the bottom right corner of the page.

At PDM Produce (UK) Ltd, we are passionate about providing nutritious, delicious, and sustainable fresh food that benefits both people and the planet. This commitment extends beyond our fields and into the heart of our operations, where we prioritize the well-being and protection of everyone involved in our supply chain.

This statement, made on behalf of the Directors of PDM Produce (UK) Ltd, reaffirms our dedication to eradicating slavery and human trafficking. In accordance with the Modern Slavery Act 2015, we outline our policies, procedures, and the proactive steps we take to identify and mitigate risks within our business and supply chain.

Our Business

PDM has been growing fresh produce in the UK for more than 30 years, supplying many of the UK's leading retailers and specialist outlets. We provide quality, fresh products, both whole head lettuce and celery as well as bagged baby leaf salads for UK and Irish consumers.

We are split into the following:

- PDM Produce (UK) Ltd
- PDM Espana

Our first packing facility was built in 1998, enabling us to respond quickly to the 'pick to plate' demand set by our consumers. At the time, this made us one of the UK's only grower/packers of these products. Our first wash line for spinach and baby leaf products was added in 2006, and by 2012 we had a full wash and ready-to-eat packing facility.

As growers of a seasonal product, we harvest what we can during the usual British season (typically May to October), using fields within a 25-mile radius of the farm. During the winter months, we supply products from our own facility in Spain as well as from trusted partners in Southern Europe.

Due to the seasonality of our industry, our colleague numbers vary between winter and summer seasons. We have around 400 permanent colleagues during the winter months and then recruit significantly from outside the UK for our summer months for harvesting personnel, taking our total colleague numbers to over 800.

We are currently supplying a mix of Washed and Ready to Eat (WRTE) bagged salads, WRTE salad bowls, Wash Before use lettuce and celery to retail and food service business across the UK and Ireland, as well as raw material salad crops to the UK and Ireland salad processing industry.

Our Commitment

We have a zero-tolerance approach to slavery and human trafficking. This commitment is embedded in our core policies, including:

- **Ethical Policy:** Sets the foundation for ethical conduct and human rights within our business.
- **Whistleblowing Policy:** Provides a confidential channel for reporting concerns, including any related to modern slavery.
- **Human Rights Policy:** Upholds the fundamental rights of all individuals within our sphere of influence.

Our Actions

1. Robust Recruitment:

- We prioritize direct recruitment for permanent roles and partner with approved agencies when necessary.
- We engage with licensed Seasonal Worker Scheme providers and adhere to the Agency Worker Regulations 2010 (as superseded by AWR 2023) for temporary staff.
- All agencies undergo annual audits and must be GLAA registered.
- We conduct thorough right-to-work, and identification checks for all employees.

2. Training and Awareness:

- Managers receive training on modern slavery through the 'Stronger Together' program.
- HR personnel are trained using the 'Responsible Recruitment' Toolkit.
- All colleagues undergo induction training on modern slavery risks and reporting procedures.
- We actively participate in training and briefings provided by the Association of Labour Providers (ALP).

3. Supply Chain Management:

- PDM is a member of the Supplier Ethical Data Exchange (SEDEX), and we are regularly audited by third parties who publish the results, making them visible to our customers.
- We are also signed up to the Gangmasters and Labour Abuse Authority (GLAA) Active Check Database, which will inform us of any changes related to the Labour Providers we use.

- We insist that all labour providers have current GLAA licences and that they follow the provisions of the Gangmasters Licencing Act 2004, adhering to all their standards, protecting workers from poor treatment and exploitation. We emphasise that no-one should pay for their work placement.
- Identification and right to work checks are carried out at induction and verified for all employees to ensure they are not in possession of fraudulent documents and that they have their original ID cards/passports with them. This also confirms the age of the colleague, making sure that we avoid any risk of employing individuals under the age of 18 unless as apprentices.
- Wages are paid either into a 'pre-payment card', which is unique to each colleague and is provided through us by our banking provider or to a UK bank account registered to and freely held by the individual.
- All our raw material suppliers have received PDM due diligence supplier packs. We recommend all our suppliers are, as a minimum, Global GRASP certified or, ideally, SMETA certified. We will challenge our raw material suppliers each year to move from Global GRASP to SMETA, and we will work with them to help them do so.
- PDM will work with all suppliers to limit risks within their own business and supply chain. We will not maintain business relationships with any suppliers that have refused assistance or have intentionally breached the human rights of their employees or colleagues. All new or potential suppliers will undergo due diligence assessment as part of the tender or negotiation process.
- We have generated an ethical pack for our packaging and transport suppliers.

4. Grievance Mechanism:

- We encourage reporting of any concerns through our confidential Whistleblowing Policy and the 'SafeCall' system. Which is trained out across the business.
- Display Unseen modern slavery hotline posters to ensure staff have multiple ways to raise grievances.

5. Collaboration:

- Member of the Food Network for Ethical Trade (FNET) sharing knowledge across the all member and working group sessions throughout the year.
- Members of the ALP.
- Members of The Ethical Trade Forums (ETF) in Spain, attending international meeting and have growers that are actively engage with the programmes of knowledge sharing across Spain.

6. Board-level Oversight:

- Our Board of Directors actively oversees our anti-slavery efforts.

Areas of Risk and Mitigation

We have identified potential risks within the following areas:

- **Labour:** Mitigated through robust recruitment practices, training, and partnerships with ethical labour providers.
- **Raw Materials:** Addressed through supplier due diligence, audits, and promoting ethical certifications.
- **Packaging:** Managed through supplier engagement and SEDEX membership.
- **Transport:** Mitigated through due diligence and promoting SEDEX membership.
- **Indirect Consumables:** Prioritizing local sourcing where possible.

Performance Indicators

We track key performance indicators (KPIs) to measure the effectiveness of our anti-slavery efforts. These include:

- Ensuring suppliers complete our ethical supplier packs.
- Working with suppliers to reduce their risk levels.
- Promoting SEDEX membership and ethical audits for suppliers.
- Increasing colleague awareness of modern slavery.

2023/2024 Performance Highlights:

- 100% of raw material suppliers are on SEDEX.
- 78% of packaging suppliers are on SEDEX.
- 8% of transport suppliers are on SEDEX.
- 58% of suppliers have GRASP audits.
- 29% of suppliers have SMETA audits.
- 96% of suppliers completed the SEDEX Self-Assessment Questionnaire (SAQ).
- 4% of suppliers are high-risk as per SEDEX Radar.
- 100% of new starters received modern slavery training.

Commitment 2023/2024	Outcome
Ensure all raw material suppliers and labour providers have been issued with and returned their appropriate supplier pack	100% of suppliers have completed our supplier packs
Work with any high-risk suppliers to reduce their risk to a medium level	This is on-going and with the changes in SEDEX SAQ this has been challenging to track.
Work with any medium risk suppliers to reduce their risk to a low level	This is on-going and with the changes in SEDEX SAQ this has been challenging to track.
For all existing raw material, transport and packing suppliers and labour providers with a headcount of 100+ to be members of SEDEX.	Of our supplier with over 100 staff 7 have SMETA audits.
For all of our raw material suppliers to have had a Global GRASP assessment or a SMETA audit	This has been completed
For a member of each product supplier to attend a local Ethical Trader Seminar	Unfortunately, there are no ethical forums in Italy, Our Spanish suppliers have attended the EFTA Forums throughout 23/24 year.
To continue to expand colleague awareness of modern slavery and human trafficking through recruitment and induction processes and up to date communications	<p>Targeting KPI's around Modern Slavery, not only at induction, but ensuring all relevant departments have staff training in awareness and how to act in an incident.</p> <p>During 2023/24 100% of new starters were trained in modern slavery and exploitation awareness in line with Stronger Together. in addition to further manager/ supervisor awareness training.</p>

Commitments for 2024/2025:

- Expand whistle-blowing programs within our supply chain.
- Increase collaboration with organizations like FNET and Spanish Ethical Trade forums.
- Develop and implement a new Supplier Code of Conduct.
- Foster awareness of responsible recruitment practices.
- Roll out the Just Good Work app to UK staff and Spanish suppliers.
- Increase transparency within our Goods Not For Resale (GNFR) supply chains.
- Roll out of modern slavery Champions.

PDM Produce is unwavering in our commitment to ethical practices and human rights. We believe that everyone deserves a workplace free from exploitation. This statement reflects our ongoing dedication to combating modern slavery and ensuring that our business operates with integrity and respect for all.

This statement will be reviewed and updated annually.

Approved and signed by Phillip Maddocks, CEO.