

Karsten UK Ltd

Modern Slavery Policy

Organisation

This statement applies to Karsten UK Ltd and the information included in the statement refers to the financial year 1st October 2022 – 30th September 2023.

Introduction

This Policy is to outline the processes that Karsten UK Ltd has in place to detect and prevent instances of Modern Slavery and Human Trafficking in our business/supply chain. We recognise the challenge is difficult and we are committed to work in partnership with our supply chain partners to combat potential risks. Karsten UK Ltd is committed to continually improve awareness, understanding and practices of modern slavery and human trafficking.

In compliance with the Modern Slavery Act 2015, Karsten UK Ltd commits to maintaining a proactive approach to prevent **no** human trafficking or slavery in our own operations or supply chain. Where occurrences are identified Karsten UK Ltd will report the matter to the GLAA or the Police in UK and with the appropriate authorities within our overseas supply chains.

Structure

Karsten UK Ltd is part of the Karsten group based in South Africa, that was established in 1958 and is a family owned business. Karsten UK Ltd is a dedicated service provider and pre-packer in the UK. Karsten UK's main focus is to co-ordinate a seamless logistical operation to transport the fruit from where it is harvested, to our customer base here within the UK.

The facility for Karsten UK Ltd is based at Enterprise Way, Pinchbeck, Spalding, Lincolnshire where fresh produce is distributed nationally to a range of customers, including retailers and wholesale markets. Karsten UK Ltd currently employs around 113 direct employees and engages with temporary workers through contract agreements with licenced Agency Labour Providers.

Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer, through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being brought or sold as property
- Being physical constrained or to have restriction placed on freedom of movement

Commitment

Karsten UK Ltd acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and additionally, its supply chains.

Karsten UK Ltd does not enter into business with any other organisation in the UK or abroad which knowingly supports or, is found to involve itself in slavery, servitude or forced or compulsory labour.

No labour provided to the Karsten UK Ltd in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Karsten UK Ltd strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

Our supply chain

In order to fulfil its activities, Karsten UK Ltd works with a number of suppliers in the UK and overseas for the supply of:

- Fresh Fruit
- Packaging
- Agency Labour Providers
- Distribution Services
- Contracted Services
- Site Services

Supply Chain Management is managed via both the Technical team and the retailer. In the event that produce is pre-approved by the retailer, the SEDEX number will be gained and linked to our system.

If fruit is brought by Karsten UK directly, then the SEDEX number and SAQ/and or SMETA audit will be gained. The supplier questionnaire that are sent, is a minimum 3 yearly and captures the SEDEX numbers and ethical audit dates. Sourcing policies from the retailers also captures this information. If required or requested suppliers will be audited by an independent certified body to conduct the audit or by the Technical team.

Agency Labour Providers

We have a close working relationship with each of our Agency Labour Providers who are all GLAA registered. Each of the Agency Providers is required to sign a Service Agreement Contract. Twice yearly each of the Agency Labour Provider are audited by our HR team and any actions found from these audits are then set out clearly for the Labour Provider to correct within an agreed given timeframe. Should a critical non-compliance be found during an audit, that Agency Provider would be reported to the GLAA.

During the agency audits, the following checks are carried out but is not limited to the following:

- Proof of Right to Work.
- Checking that settled or pre settled status is gained.
- Pay – ensuring that the National Minimum Wage/National Living Wage along with any statutory payments are being paid.
- Checking of individuals wage slips to ensure that they are accurate.
- Ensure that training has taken place, this include inductions, awareness of workplace activity and Stronger Together.
- File Checks, ensuring that the following has been completed at Induction; application forms, workers employment history, how they heard about their agency provider, medical checks, employee information, WTD, bank details, and food safety questionnaires.
- Checking of the Labour Providers Policies and Procedures.
- Carrying out GLAA Active Checks on the Labour Provider.
- Checking of multiple occupancy and any shared bank accounts

Monthly Workers interviews are conducted confidentially onsite at Karsten UK Ltd by the HR and Management teams. Any findings or concerns raised are dealt with immediately. All Worker's hours are also closely monitored, this is done by the HR Team, Department Managers and each Agency Labour Provider and this is done via our Time and Attendance system.

Communication and Training

Karsten UK HR team members have attended Stronger Together training sessions, along with the Modern Slavery Act seminars provided by the ALP. All employees of Karsten UK Ltd have then been provided training following these sessions.

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Stronger Together awareness training in the form of information and video is also given/shown as part of our Induction Programme to all Karsten UK Employees and Agency Personnel. All our Agency Labour Providers have attended the Stronger Together workshops and support this Initiative.

We have the Stronger Together video showing on a TV which is located in our main canteen at regular intervals throughout each day to raise awareness. Stronger Together posters and help line numbers are displayed in canteens, offices and toilets to give help and guidance should it be needed. We actively encourage all staff to be constantly vigilant and report any concerns the might have to management. Karsten UK Ltd also has a confidential Whistle Blowing Policy that allows employees/workers to report anonymously and is encouraging each of the Agency Labour Providers to also have one set up if they do not currently have one set up.

Key Performance Indicators

Karsten UK Ltd continually work to prevent and tackle modern slavery through several KPI's in the following areas: (3rd Party SMETA Audits, Whistleblowing Hotlines, Stronger Together Training and onsite Modern Slavery Champions).

Policies and Procedures

Karsten UK Ltd has internal policies and procedures set up and are available to all employees. These are also found on the Karsten UK intranet, staff handbooks are located in various locations on site and this is explained and gone through during Induction training and any relevant in house training sessions.

External Audits

Karsten UK Ltd has a third party semi announced ethical audit (SMETA) conducted every 2 years.

Statement Approval

This statement is made in pursuance of s.54 (1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Managing Director signature:

Herman Engelbrecht
Managing Director
Date: 1st October 2022