

# Monaghan Statement of Compliance Modern Slavery and the Supply Chain

## Introduction

This statement is made in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps that Monaghan has taken and is continuing to take to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain.

Modern slavery includes slavery, servitude, human trafficking and forced labour. Monaghan 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 taking place within the business or our supply chain.

## Our Business

Monaghan is one of the world's largest substrate and mushroom companies, established in the early 1980's. We are a family business with very strong values for people, customers, the environment and suppliers. Headquartered in Co. Monaghan in Ireland, our operations span Canada, Ireland, the United Kingdom and Europe. We employ circa 3,500 people and supply a number of major retailers across, the UK, ROI and Europe with fresh mushrooms.

## Due Diligence Processes

We are operating in a sector that has relatively high risk of slavery and/or trafficking. We mitigate the risk by internally reviewing our supply chain to evaluate human trafficking and slavery risks. We conduct supplier audits which review all aspects of the supply chain including safety, human trafficking, child labour and other legal requirements.

As part of our ongoing strategy to identify and mitigate risk we have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Monitor potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers (whistle blowing policy).
- Promote best practice in tackling modern slavery and human trafficking.

We encourage and expect our suppliers and labour providers to comply with best practice in tackling modern slavery and human trafficking. Monaghan will guide, support and advise our supplier and labour providers where required.

We are members of SEDEX (Suppliers Ethical Data Exchange) and we are regularly audited by third parties who publish our audit results on the SEDEX portal.

We hold Business Partner status with Stronger Together. We upload evidence to publicly demonstrate our commitment to tackling hidden labour exploitation and as such may use the Stronger Together Business Partner logo on business materials.

## Internal

As part of our interview process we ask questions to confirm that the workers are not victims of forced labour or human trafficking. Right to work checks are completed for all employees in the business and personnel completing these checks are suitably trained.

We also regularly conduct random audits across our sites to ensure good practice in identifying, deterring and tackling hidden labour exploitation throughout the business in a consistent manner. To help, we display awareness posters around our sites (in canteens, toilets, offices, etc.). Furthermore we systematically check addresses of workers for high occupancy of particular houses, we check bank details to ensure that unrelated workers are not being paid into the same bank account and we also check next of kin/emergency contacts; acting accordingly on the information.

## Labour Providers/Agencies

As a business we employ workers on a permanent basis, however due to the unique demands of one of our sites temporary workers are used on occasion. If we are using an agency for recruitment purposes, we will only do so after the agency has gone through a process of agreeing terms and being risk assessed. We also ensure that all agencies where required hold a GLAA license.

If we make use of an agency we only use agencies with a good reputation and who are listed as preferred suppliers. In the event that we identify an employment agency is not adhering to standards we will remove them from the preferred supplier list and not engage any further with them.

## Suppliers

Monaghan operates a live supplier approval procedure & risk assessment. We also maintain a preferred Grower supplier list.

We conduct due diligence on all mushroom suppliers before allowing them to become a preferred supplier. This due diligence includes an initial on site internal audit by a trained Monaghan representative on their facility, completion of a supplier approval questionnaire and submission of the supplier's third party accreditation documentation.

## Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

### **Equal Opportunities Policy -**

We are fully committed to ensuring that equal opportunities are implemented and maintained throughout the business. All terms and conditions of service apply on a fair and consistent basis to every member of staff.

### **Recruitment Policy -**

We operate a robust recruitment policy, including conducting checks on work eligibility for all employees.

### **Whistleblowing policy -**

We operate a whistleblowing policy so that all employees know that they can confidentially raise concerns for example about how colleagues are being treated, or practices within our business or supply chain, without fear of repercussions.

### **Company Code of Conduct -**

Sets a standard of conduct that is acceptable to the company, its suppliers, customers and employees.

### **Group Ethical Trading Policy -**

Ensure the labour standards for the people working for Monaghan Group Supply Chain meet or exceed the requirements of the ETI Base Code or National Law, whichever offers greater protection for the workers and that we meet customer requirements.

### **Corporate Social Responsibility Policy -**

Monaghan advocates corporate responsibility in every aspect of our business on a daily basis.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and in our supply chains, we provide relevant training across the business, so that everyone has an understanding of the signs of modern slavery and what to do if they suspect that it is taking place within our business or supply chain.

Induction training for new workers includes a section on how to recognise and report forced labour, trafficking and other hidden third party exploitation. This training has also been carried out with existing staff, including supervisors and managers to ensure that they also have awareness.

We also hold information sessions for our external mushroom suppliers.

## **Our Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- No concerns are found through desktop audits
- Nothing is raised through worker interviews

## **Remediation**

We have a remediation plan to be followed in the event that forced labour, modern slavery or human trafficking activities should be found or alleged in our business or supply chain. Since the symptoms and root causes of forced labour are varied, the investigation and corrective actions need to be tailored to the circumstances surrounding the case.

## **Further Steps**

We intend to take the following further steps to continue to combat slavery and human trafficking, going forward:

- Continue to monitor all new and existing mushroom suppliers through risk assessment review and supplier review
- Launch refresher training in conducting Right to Work checks for relevant personnel.

## **Approval for this statement**

This statement has been approved by Philip Wilson, Director, of Monaghan, on 28th May 2020. It will be reviewed and updated annually.

A handwritten signature in black ink, appearing to read "P. Wilson", written over a horizontal line.

Philip Wilson, Director