

Tackling Modern Slavery and Preventing Hidden Labour Exploitation Policy

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This Policy has been created to set our position with respect to Human Rights and to detect and prevent instances of Modern Slavery and Human Trafficking within our supply chain. These processes reflect Melon&Co Ltd commitment and proactive approach to these issues. This policy is also intended to help employees understand what Modern Slavery is and how suspected instances should be reported and to raise general awareness amongst staff.

Melon&Co Ltd recognises the responsibility to operate ethically and to monitor suppliers to ensure that they in turn comply. This policy has been created to outline employee responsibilities when it comes to ethical trading and how we ensure our growers meet the ethical standards we require.

Melon&Co Ltd shall not enter business with any organisation, in the UK, or abroad which knowingly supports or is found to be involved in slavery, forced or compulsory labour, human trafficking, or servitude.

Responsibility

The Technical team is designated to the review and updating of all Ethical policies as necessary and as a minimum annually. Overall responsibility for this policy is with the C.E.O. of Melon&Co Ltd. Policy updates shall be issued out to all members of staff when changes or updates are made. All Melon&Co Ltd employees are responsible for reporting suspected instances of Hidden Labour Exploitation and Modern Slavery if their suspicion is aroused anywhere through the supply chain - grower, transport, third party storage facilities etc. If a member of staff suspects that there is labour exploitation in our supply chain it should be reported immediately to a Senior Manager, Technical Manager or C.E.O.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains we have adopted the following due diligence procedures:

- Monitor potential risks through our supply chain via Horizon Scanning and industry intelligence.
- Identify and action any potential risk in our supply chain
 - Depending on the risk and its severity, this may be escalated to the Senior Management team and Crisis Management Team.
- Protection for whistle-blowers.

What is Modern Slavery?

Modern Slavery is a broad term used to encompass the offences of slavery, forced and compulsory labour and human trafficking. The term extends to slavery-like practices such as debt bondage, sale/exploitation of children and individuals being forced to work against their free will, forced and early marriage and descent-based slavery.

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Authorised by: J.Szymborski

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Hidden labour exploitation comes under the umbrella term of Modern Slavery. This is the exploitation of job applicants and workers by third party individuals or gangs other than a labour provider or employer and without the knowledge of management. This form of slavery is often hidden well by the perpetrators, with victims reluctant to come forward for a variety of reasons.

The Modern Slavery Act 2015 consolidated the previously separated offences such as human trafficking, forced labour and hidden labour exploitation. It also works to effectively fight the offences under the new umbrella term of Modern Slavery. One way the act does this is to require businesses to be transparent about how they tackle potential slavery. This therefore encourages businesses to be more proactive in their deterrence and detection of offences.

Processes in place to deter and detect Modern Slavery in our business and supply chain

Melon&Co Ltd recognises our social responsibility to ensure that Modern Slavery is not active in our supply chain and we therefore follow the principles set out in the ETI (Ethical Trade Initiative) Base Code.

We ensure that our supply chain is following the ETI Base Code, and High-Risk countries require ethical audit as a prerequisite to supply, with results being made visible to the Melon&Co Ltd technical department.

We have a robust system of Risk Assessment (Sedex Analytics & Radar) which pinpoints high risk areas so that we can effectively mitigate the risk of labour exploitation in our supply chain and Business should an issue be recognised.

Melon&Co Ltd have identified two areas within our supply chain that pose the greatest ongoing risk from Modern Slavery and Human Trafficking. These are Labour Providers to our growers and growers in High-Risk Countries.

These two areas have been identified as high risk due to them being out of our direct control and because we are, to a certain extent, reliant on the grower and their labour provider being honest about their ethical views, adherence to the ETI Base Code and adherence to their local employment laws.

In order to mitigate the risk of Modern Slavery and Human Trafficking from growers in high-risk countries Melon&Co Ltd:

- Requests that Supplier Approval Questionnaires are filled out by growers. These are translated into their first language where possible and include questions about Certification, Security and Ethical Management. Suspicious answers are investigated and could affect our use of the grower.
- Request that growers register with Sedex and complete their SAQ to 100%. Suspicious answers are investigated and could affect our use of the grower.
- Maintain good relationships with growers to encourage honesty and transparency.
- Has an overall Business supply strategy based on vertical integration and rationalisation that is determined by the strength of relationship, integrity, and performance.

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- Requests that growers are SMETA audited according to their risk rating and when requested by customers.
- Makes use of Horizon Scanning and reporting tools (eg. SEDEX RADAR, ETI updates) to maintain a holistic view of risk in the countries from which we source.
- Conduct site visits when safe to do so. These are carried out by members of the Technical and Commercial teams.

We believe that these processes mitigate to the best of our ability, the high risk of Modern Slavery and Human Trafficking in these areas and would alert us to any possible instances while deterring possible cases.



Justin Szyborski

C.E.O.

Contact numbers:

- The Modern Slavery helpline: Num - 0800 0121 700 (24 hours),
Online Contact Form – [Modern Slavery Helpline](https://www.modernslaveryhelpline.org/) <https://www.modernslaveryhelpline.org/>
- Crimestoppers: Num – 0800 555 111,
Online Contact Form – <https://crimestoppers-uk.org/give-information/give-information-online/>.
- The Salvation Army: Num – 0300 303 8151 (24 hour).
- Migrant Help: Num – 07766 668 781, website [Migrant Help](#)