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Quality.
Service.



Modern Slavery Statement

Financial Year 1st April 2022 to 30th September 2023

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Introduction

Founded in 2014, ISS Ltd is an innovative service provider operating primarily in the fresh produce industry. We inspect, ripen and package a range of fruit and salad products for our customers to supply predominantly UK and ROI retailers.



This statement has been published in accordance with section 54 of the Modern Slavery Act 2015. It sets out Integrated Service Solutions' commitment to eradicating Modern Day Slavery within our own supply chain and those in which we operate.

This is ISS' third modern slavery statement issued under the Modern Slavery Act.

In 2023 we changed our financial year to align with our parent Company so this statement covers the period 1st April 2022 to 30th September 2023.

This statement outlines the steps taken and progress made by ISS over the last 18 months to prevent modern slavery and human trafficking within our organisation and the supply chains within which we operate.

Summary of key actions over the last 18 months

Agreed a set KPIs which we will start measuring in 2023/2024

Started to scope requirements for packaging suppliers' due diligence

Additional welfare checks introduced

Increased modern slavery engagement activities with employees, suppliers, customers and local police force

Trained 28 additional managers and supervisors in Stronger Together Preventing Modern Slavery in UK Businesses.

This statement was prepared by the Head of People, Kay Makin and has been approved by the Managing Director, John Counsell.

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Organisation Structure and Supply Chains



Scope

Integrated Service Solutions Ltd (ISS) is a subsidiary of Terradace Holdings Limited, operate in the UK and employ a team of over 1100 people.

Who we are

ISS Ltd are an innovative service provider operating primarily within the Fresh Produce sector. We focus on handling, quality control, ripening and packing of fruit and salad products delivering own brand fresh produce to our customers who predominantly operate in the retail sector within the UK and Republic of Ireland.

Due to an acquisition by our parent Company in the last 12 months we now operate across 3 sites based in Kent; Teynham, Linton and Sittingbourne, occupying over 324,000 sq ft.

During the 18-month reporting period our turnover exceeded £76m.

At our core

People, Quality and Service are our core operating pillars and have enabled us to grow and develop strong relationships with our teams, customers and suppliers.

Our supply chain

Our supply chain is broadly split into two areas, the supply of people and the supply of ancillary products and services. To date the former has represented a significantly higher risk of labour exploitation than the latter and has received greater focus due to this.

Our values



We do the right thing

All the time, even when no one is watching.



We believe in progress

We are dynamic and innovative, we learn from today to make tomorrow better.



We are all accountable

We take ownership of our actions and hold others accountable for theirs.



We make a difference

To our customers, to supply chains, to each other.



We are one team

We are all working together to achieve the same objectives.

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Modern Slavery Policies



Our Policies

ISS have a number of policies in place that specifically relate to modern slavery and support our aim to prevent modern slavery within our organisation and supply chains. These policies are:

1. Speak Up Policy
2. Ethical Practice Policy
3. Preventing Hidden Labour Exploitation Policy - this policy will go live early in 2024.

ISS uphold the ETI principles and are independently audited to Sedex standards. We have no outstanding non-conformances from our recent SEDEX audits in February 2023.



Governance

ISS' Senior Leadership team, chaired by the Managing Director, John Counsell is accountable for modern slavery activities within the business and the Board have final sign off.

We have grievance and confidential reporting mechanisms in place to facilitate confidential reporting of concerns. This includes the provision of an independently operated whistle-blower line 'Safecall' that can be accessed online or by phone by any of our employees or agency workers. We also pro-actively advertise and make employees, agency workers and visitors to site aware of independent modern slavery reporting lines such as The Modern Slavery Helpline and the GLAA.

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Due Diligence Process

ISS are SEDEX members and have completed and regularly updated a Self Assessment Questionnaire (SAQ)

The HR team audit our labour providers every six months. They use the Complyer tool to assess labour providers statutory compliance with UK legislation, GLAA Licensing Standards, ETI Base code, Agency Worker Regulations and other general employment and financial legislation.

During the audits they conduct a worker interviews across a random sample of workers to identify any concerns, poor practices or treatment or any indicators of modern slavery so appropriate action can be taken.

Any actions arising from the audits are recorded and non-conformances have to be signed off as satisfactorily closed by the HR Team. Non-conformances that are not closed in good time or are of a serious nature are escalated to the MD and our legal support if required.

Due diligence audits are carried out by the HR team before any new agency labour providers are considered for supply.

ISS has made some progress in improving the due diligence process around our non-labour supply base in this reporting year. We have scoped the requirements of our current suppliers and any future suppliers and have been working with our current suppliers to gather evidence of compliance against our requirements. We acknowledge that we can still do more and will continue to work on this over the coming year.

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Risk Assessment & Management



The most significant risk to ISS is the reliance on temporary labour.



ISS manage this risk by using known, GLAA registered, audited and trusted labour suppliers and actively engage with workers to try and uncover concerns about modern slavery within their network. Most of our temporary workers are already living in the UK and are not sourced directly from overseas.

We recognise that the challenging global economic and geopolitical situation combined with an imbalance in labour supply and demand in the areas and supply chains in which we operate increases the potential for worker exploitation, modern slavery and people trafficking to satisfy demand.

As a trusted supplier partner and tier 1 supply site to UK retailers we understand the need for collaborative working and shared aims to reduce risk and identify and resolve issues that arise with the protection of both people and brand being the primary outcome.



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Investigating Modern Slavery Allegations



Incident Management

Where issues are identified, we work to an established internal incident management and escalation process to ensure that we receive all relevant information and act quickly and effectively. We are able to receive information 24/7, and we have clear procedures detailed as part of our Emergency Action Plan which forms part of our Business Continuity Plan to make senior colleagues aware of incidents, seek advice on how to handle the situation and ensure that appropriate actions are being taken.



Investigation and Collaboration

When we receive intelligence through our own audits, protector line, our customers or suppliers or any other method we always ensure this is investigated and where appropriate the information is shared within the confines of GDPR and/or reported to the local police and Gangmasters and Labour Abuse Authority (GLAA). We also inform our customers and retailers and work with their ethical and human rights teams to keep them informed and also seek additional advice and support if needed.

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Investigating Modern Slavery Allegations



Reported Issues

In the past 18 months, we have identified two allegations containing indicators of modern slavery within our business both pertaining to agency labour. One of these allegations of exploitation was confirmed, the other after investigation was not found to be true. The allegation that was confirmed was an isolated incident at our Teynham site and was discovered due to the proactivity of our labour provider's onsite team.

In summary, some concerns were raised to the agency coordinators during the victim's second shift with the labour provider and ISS and through building trust with the victim, on the third shift they approached the agency coordinator for help because they had been trafficked to the UK and exploited for 6-12 months. One of the perpetrators was also working for the labour provider alongside the victim.

We worked quickly with the agency and the Police to investigate the issue and they were able to arrest the perpetrator at the end of the shift. The victim was supported temporarily by The Salvation Army before being placed into the National Referral Mechanism. ISS and the labour provider cooperated in full with the police investigation and ISS provided remediation to the victim. During and after this incident we worked in full collaboration with our labour provider and kept our customers and retailers informed throughout, all of whom were very complimentary of how we had handled the incident.

We have shared our learnings from this incident with our other labour providers, customers and retailers and have used them to inform our strategy moving forward.



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Progress Made



ISS has reviewed its structural approach to temporary labour and have taken the following positive actions to reduce the risk of exploitation and ensure workers have freedom of movement, are not paying for a job at ISS are not indebted or coerced to work:

Increased proportion of directly employed colleagues, reducing reliance on agency labour.

Terminated relationship with an inherited labour provider from an acquisition as we believe their practices did not align with our core ethical principles and replaced them with one who did.

Engagement Surveys

We improved our engagement and participation score on our engagement and wellbeing survey from the year previous.

We also took part in a retailer engagement survey with good results.

Non-labour supply chain progress

Throughout the reporting period our procurement teams have rationalised our supplier base, hosted a supplier conference during which modern slavery within supply chains and modern slavery due diligence was a key topic for discussion to outline our expectations to them if they want to maintain a future relationship with the business. We have also added a modern slavery section into our supplier audits which forms part of their scorecard.

Stronger Together welfare questionnaires introduced into our induction for employees. Questionnaires are taken in their own language so they can answer as honestly as possible and raise any concerns they might have about their welfare and modern slavery. We have also requested that our agency partners also follow this process and we will audit that during our regular audits of the agencies.

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Progress Made



Events Hosted and Attended

In May 2023 we hosted an event with Kent Police for our HR Team and our customers on Modern Slavery

In June 2023, 28 managers and supervisors completed Stronger Together, Preventing Modern Slavery in UK Businesses Training.

During the 18 month reporting period our Head of People has attended 2 Modern Slavery Intelligence Network conferences.

During the 18 month reporting period our Head of People has been a guest speaker for several webinars hosted by our customers for their own teams and their growers on Modern Slavery and Responsible Recruitment.

Modern Slavery Intelligence Network (MSIN)

We have made a joint application with other companies in our group to join MSIN.

Monthly Welfare Spot Checks

Introduced monthly welfare spot checks. A cross section of workers and employees are invited to participate in welfare interviews to give them an opportunity to raise concerns and us an opportunity to look for any slavery indicators.

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Key Performance Indicators



To date, ISS have not been measuring modern slavery specific KPIs as they have been embedded within our business KPIs. However we have agreed 3 key areas related to modern slavery that we will introduce KPIs in over the next 12 months so we can formally monitor and review our progress and assess our effectiveness and also to drive continuous improvement in.

Modern Slavery Due Diligence

- Number of agency audits completed
- % of managers and supervisors who have completed Stronger Together Preventing Modern Slavery in Businesses Training

Assessing and Managing Modern Slavery Risks

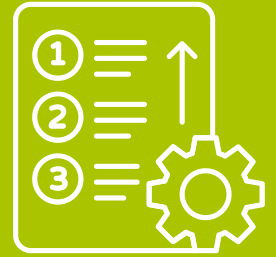
- % improvement in Stronger Together Progress Reporting Tool score
- Achieve and maintain Stronger Together Business Partner status

Raising Modern Slavery Awareness and Building Capability

- % completion of Modern Slavery Welfare Questionnaire's for agency workers
- Number and % of employees engaged throughout Modern Slavery Awareness month
- Number of people who take part in customer direct worker voice surveys

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Priorities for the next 12 months



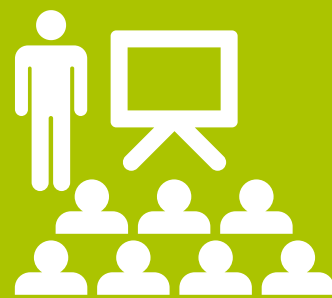
Our plans for the next 12 months include:

- Further engagement with customer initiatives to monitor and improve our awareness of potential issues and sharing of knowledge and approach with industry peers to develop best practice.
- If our application to join the Modern Slavery Intelligence Network is accepted, work proactively to engage with other members by sharing intelligence and best practice.
- Additional managers and supervisors will complete Stronger Together Preventing Modern Slavery in UK Businesses training.
- Senior Leadership Team will complete Stronger Together Advanced Tackling Modern Slavery in UK Businesses training.
- Play a proactive part in our group wide modern slavery working group to ensure best practice is shared across the group of companies and regular engagement activities planned.
- Further engage with our suppliers on modern slavery prevention within their supply chains and increase our own diligence and expectations of them in relation to this.
- Run Modern Slavery Awareness month in October 2023 across all sites with lunch and learn activities as well as lots of literature and information available within working and break out environments for workers in multiple languages to raise as much awareness as possible.
- Review current policies and create new policies that specifically target the prevention of modern slavery and make this information more accessible to our teams and temporary workers.



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Training & Awareness



Aim

Our aim is to raise awareness of modern slavery within our organisation and within our supply chains, providing managers and teams with the knowledge to identify activities and behaviours that may be linked to exploitation. We proactively communicate to our teams as well as providing access to support, resources and tools for both managers and individuals in multiple languages and formats so that they may be confident in reporting concerns or seeking help in their native language and a method that suits them.



We continue to provide compulsory training to every member of our team and our temporary labour teams as part of our induction process; every team member watches the Stronger Together film subtitled in their native language and takes part in a discussion about modern slavery afterwards. They also then complete a welfare questionnaire based around modern slavery in their preferred language.

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