



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FINANCIAL YEAR 2022

Modern slavery is an act that deprives one person's liberty and dignity for another person's gain. At Halls, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. Every company is at risk of being involved in this crime through its own operations and its supply chain. This statement sets out the actions that we have taken during the financial year 2022 (1 March 2021 - 28 February 2022) to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking. It is made in line with the requirements of the Section 54 of the Modern Slavery Act 2015.

HALLS COMMITMENTS

Halls policies and practices are guided by the framework of UN Guiding Principles on Business and Human Rights, the principles of which shall be met by all employees and business partners. Halls staff recruitment, either directly or through employment agencies, takes Modern Slavery and Human trafficking into consideration with the express aim of eliminating it. Halls seeks to eliminate the possibility for Human Trafficking and Modern Slavery from our supply chain and will not knowingly engage with suppliers who do not comply with requirements of the law.

HALLS BUSINESS

Halls Fresh Produce is part of the HL Hall & Sons Group of Companies. Halls Fresh Produce specialises in the growing, sourcing, packing, ripening, distribution, and marketing of quality sub-tropical fresh produce, with a focus on avocado. Halls Fresh Produce has operations in seven countries worldwide: UK, France, Netherlands, Spain, Germany, South Africa and China. These operations supply the retail, wholesale and foodservice channels in the respective marketing territory. We seek to establish well founded and long-standing business relationships which are based on mutual understanding, trust and integrity with all our suppliers.

HALLS GOVERNANCE

Written policies and procedures are fully supported and underwritten by the Halls Fresh Produce Chief Executive and are executed by the Senior Management.

The policies relating to the eradication of Modern Slavery in our supply chain include:

- the Halls Responsible Sourcing Policy
- the Halls Supplier Code of Conduct
- the Halls Whistle-blower Policy
- the Halls Remediation Protocol. This addresses, but is not exclusive to, the issue of forced labour and the recommended course of action to take should a case be reported. The process allows for consultation and transparency whilst specifically seeking to ensure that corrective actions are

A MEMBER OF THE HL HALL & SONS GROUP

HL Hall & Sons (Pty) Ltd

Registration No 1921/006878/07

Mataffin Farm, Cnr Samora Machel Dr & Matsafeni Rd, Nelspruit, Mbombela
tel +27 (0)13 753 5700 email info@halls.co.za

Directors M Ajoodha, T N Davies, A C Kanana, J G Williams

identified and undertaken to serve to help prevent recurrence.

- Our Halls South African businesses have labour union representatives (FAWU). Within South Africa we report Employment Equity statistics and submit an EE plan and annual progress reports to the labour department, we are compliant with all requirements to manage gender and race targets for employment in South Africa.
- Halls recruitment policy ensures compliance with all local requirements in countries of operation.

HALLS RISK ASSESSMENT

Halls undertake a risk assessment approach through our supply chain. The annual assessment of risk relating to human trafficking and modern slavery for Financial Year ending 28 February 2022 highlighted that our top risks remain within our supply chain.

Mitigation of risk within our supply chain begins with the Halls Supplier Due Diligence process in which Halls communicate our policies to our suppliers and seek their written acknowledgment and agreement that, to the best of their knowledge and ability, they will ensure that no Modern Slavery or Human Trafficking occurs in the procurement of goods for supply to the Halls Group of Companies.

Further assessment is undertaken using the SEDEX platform and an evaluation of the third-party certifications which support the supply of good and services. Third party certifications on social and working conditions accepted by Halls are SMETA, Rainforest Alliance, SIZA and/or GRASP.

The due diligence process includes scheduled visits to the suppliers. Where such visits have been restricted due to Covid 19 travel restrictions online engagement has taken place.

In the Financial Year FY22 no findings were reported directly or indirectly to Halls using the grievance/complaints.

Should allegations of human trafficking/slavery activities against any of our suppliers be brought to our attention we will act immediately to engage with the supplier and report it to the necessary authorities and act in line with the Halls Remediation Protocol.

HALLS AWARENESS

Halls has raised awareness of modern slavery issues by hosting a “Stronger Together” workshops at our facilities. This workshop is open to growers from all industries, labour contractors, our staff and the community. The programme supports responsible businesses to address forced labour and hidden labour exploitation and acknowledges that the collaboration of all industry members is vital to effectively tackle human trafficking and slavery.

HALLS ASSESSMENT PLAN FY 2023

Continued risk assessment of our supply chain will be undertaken considering:

- The business services rendered by the suppliers.
- The presence of vulnerable demographic groups.
- The importance / proportion of trade by the supplier to Halls

Our diligence will be enhanced with the following:

- implementation of third-party risk assessment platform to bring third-party data from The Global Slavery Index
 - Analysis and the insights of labour and human rights groups.
 - Continued review of all policies to include processes to identify and prevent slavery and human trafficking in our operations.
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- Internal training to ensure that knowledge and expertise on Modern Slavery is present in each of the sites of operation.

This assessment will determine our response and the risk controls that we implement. This statement has been approved by the board of Halls.

CEO - Halls Fresh Produce