

## Chief Executive Statement

The Monaghan Group recognises its responsibility to prevent slavery and human trafficking, and the example we must set within our industry.

Across our Group, we are committed to retaining the highest standards of employee welfare and safety. The Monaghan Group is committed to acting ethically, with integrity and transparency in all business dealings. This commitment is outlined in our training and company policies, which promote ethical behaviours. Our suppliers are aware that we do not tolerate any form of modern slavery, and we will work with them to ensure they are able to meet the standards required, and that the company's expectations are understood and upheld.

Our philosophy is 'We do the right thing' and we use it to drive every aspect of our business, from product, to process, to people.

Although we believe our actions have proven effective to date there is no room for complacency, and we remain vigilant to potential threats. We continue to review and adapt our approach to managing the risk of modern slavery within our business and supply chain.

A handwritten signature in blue ink, appearing to read "Paul Wilson". The signature is stylized and fluid, with a large initial "P" and "W".

Paul Wilson  
CEO,  
Monaghan

# 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. This statement relates to actions and activities during the reporting period 01 July 2023 to 31 June 2024.

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.

We produce one Modern Slavery Statement for the Monaghan Group.

#### Our Business

Monaghan is one of the world's largest mushroom companies, established in the early 1980's. We are a family business with very strong values for people, customers, the environment and suppliers.

We are a vertically integrated agribusiness involved in all aspects of the supply chain from substrate production to growing, harvesting, packing and distribution. Headquartered in Co. Monaghan in Ireland, our operations span Canada, Ireland, the United Kingdom and Europe. We employ circa 2,500 people and supply fresh mushrooms to a number of major retailers across, the UK, ROI and Europe.

#### Values

Our vision and purpose are underpinned by a strong set of values that describe what we stand for and how we behave within all our business dealings. Our underlying philosophy is 'We do the right thing' and we use it to drive every aspect of our business, from product, to process, to people. The Monaghan Group is committed to eliminating Modern Slavery and supporting the business and our supply chain to ensure all practices are ethical and in line with our business values.

#### 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 also conduct regular produce supplier audits.

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.

- 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). We are regularly audited by third parties who publish our audit results on the SEDEX portal. Our UK and ROI growing farms and packhouses are SEDEX registered and have completed the Self-Assessment Questionnaire (SAQ), providing a risk rating and have an independent audit to the SMETA standard. Actions to correct any non-conformances resulting from the audits are detailed by the site in a corrective action plan.

Monaghan is a member of the Association of Labour Providers (ALP). Labour providers play a vital role in the economy by supplying the essential workers to ensure our sites have the people they need to keep the nation supplied and fed. ALP promotes responsible recruitment and supports and represents its members so that labour provision in our sectors is recognised as a model of sustainable good practice.

We have recently become members of FNET (Food Network for Ethical Trade), an initiative to use collective leverage of suppliers and retailers to bring positive change to global supply chains. We are using FNET tools to assess and review our approach to human rights risks within our business and work as part of collaborative working groups to tackle issues within our supply chains.

As part of our interview process, we ask questions to ensure candidates are not victims of forced labour or human trafficking. We communicate that we do not charge any fees for a job with our company and we do not permit anyone, whether an individual or an agency, to charge for services related to securing a job at any stage of the recruitment process, other than approved charges which are clearly documented e.g. visa.

Monaghan is committed to ensuring transparent recruitment practices and minimising the risk of recruitment fees. If fees are found to have been charged, we are committed to understanding fees, supporting individuals, reporting to relevant authorities and taking appropriate action. We continue to review and adapt our approach in this area and have developed new strategic partnerships to allow us to deepen our understanding of recruitment practices in different regions.

Right to work checks are completed for all employees in the business and personnel completing these checks are suitably trained.

We signpost employees on all our UK sites to the Just Good Work App. Just Good Work is an important tool to help ensure everyone in our supply chain receives the same information on rights and responsibilities in the workplace.

We 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 direct contracts. We have no current plans to use agency workers, however in the event we decide to use agencies due to an unforeseen business need, we would only do so after the agency has gone through a process of agreeing terms and being risk assessed. We would 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 and risk assessment. We also maintain a preferred Grower supplier and approved haulier 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 where possible by a trained Monaghan representative on their facility, completion of a supplier approval questionnaire and submission of the supplier's third-party accreditation documentation. Growers sign up to our supplier principles.

### **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 have developed a number of specific internal policies which address labour and human rights, promote best practice and establish confidential channels of communication for any concerns to be raised. These policies include:

**Human Rights** - Monaghan believes in the dignity of everyone and respects individual rights. We recognise the corporate responsibility to respect these values and commit to demonstrate this through on-going human rights due diligence. Human rights education promotes values, beliefs and attitudes that encourage all individuals to uphold their own rights and those of others and enables colleagues to be proud of the ethical standard. We will not tolerate the abuse of human rights within any part of our business or our supply chains.

**Corporate Social Responsibility Policy** - Monaghan advocates corporate social responsibility across the business. The principles of CSR complement our corporate values and our philosophy of "We do the right thing".

**Recruitment and Selection Policy** - We operate a robust recruitment policy, including conducting checks on worker eligibility for all employees.

**Whistleblowing/Speak Up** - We operate a whistleblowing/Speak Up policy with a dedicated hotline, which is clearly communicated to all employees during their induction and throughout their employment with the company. This is to encourage workers to report any concerns about human rights violations or any other wrong doings within the business or supply chain. Any such reports will be taken extremely seriously and thoroughly investigated.

**Ethical Trading Policy** - This outlines our aim to act responsibly in our commercial and trading activities whilst striving to ensure that the labour standards of our Supply Chain will meet relevant international standards. Monaghan applies the Ethical Trading Initiative (ETI) Base Code as a core standard for its company operations and its produce suppliers. All produce suppliers have been issued with an 'Ethical Trading Policy' and are required to comply with both local legislation and the ETI Base Code as a minimum requirement.

In addition to the above we have comprehensive policies in place for **Equal Opportunities, Dignity at work, Grievance and Disciplinary procedures**. We continually review our business and people policies to strengthen our commitment and reduce the risk from any form of modern slavery taking place within the business or our supply chain.

### Training

Training is an important way of raising awareness and ensuring that people understand what modern slavery is and what they need to do if they encounter something that raises concerns. Members of our Human Resources Department, along with a number of our operational managers, have attended workshops through Stronger Together. In addition to Stronger Together we carry out the following;

- In house training for managers
- Induction training
- Regular Toolbox Talks with employees to maintain awareness
- Training for employee representatives

### Our Performance Indicators

Monaghan has developed key performance indicators (KPIs) to monitor the effectiveness of the steps it is taking regarding slavery and/or human trafficking. These KPIs include:

Key Performance Indicator	2024
% of sites with a representative who has attended Stronger Together Training	90%
% internal human rights site audits completed * (in addition to SEDEX and existing controls)	30%
% of produce suppliers that have an up-to-date ethical risk assessment	94%
Number of whistle blowing/speak up cases relating to Modern Slavery	0
Number of suspected cases	0
Number of confirmed cases	0

\* During the reporting year we took the decision to expand the scope of our internal modern slavery audit to a wider internal human rights audit. As such we have reported on the completion of our new updated Human Rights Audits. These internal audits are in addition to SEDEX audits and other existing controls.

### 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

Over the next 12 months we will continue to build on the progress we have made and continue to uphold our commitment to addressing modern slavery risks within our business/supply chain. Our focus areas are.

- Continued expansion of our training programmes, adding new stakeholders and increasing the scope of materials
- Introducing site champions

- Continue to develop new strategic partnerships to allow us to deepen our understanding of recruitment practices in different regions

**Approval for this statement**

This statement has been approved by the Board and signed by Paul Wilson, CEO, on 20 November 2024. It will be reviewed and updated annually.