



Preventing Hidden Labour Exploitation Policy

Policy

Introduction

Suncrop Produce Limited commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is defined as the exploitation of job applicants and / or workers by a third-party individual or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. This can include forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation.

Purpose

The purpose of this policy is to provide clarity to all employees, agency workers and agency labour providers on the Company's standards, processes and actions that it commits to take in order to protect workers from the threat of labour exploitation.

This policy is applicable to all Suncrop Limited sites.

Responsibilities

The Operations Director and all employees responsible for directly recruiting workers are responsible for the enforcement of this policy and accompanying procedures to line managers, colleagues and providers of agency workers.

Our Policy Commitments

Suncrop Produce Limited shall:

1. Designate appropriate employees to attend "Tackling Hidden Labour Exploitation" training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that agency or applicant finding fees are a business cost, and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting employees are aware of issues around third-party labour exploitation and signs to look for and have signed appropriate Compliance Principles.



4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent employees.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gang masters Licensing Authority and police.
6. Provide information on tackling “Hidden Labour Exploitation” to our workforce through a variety of formats including training, workplace posters, worker leaflets, inductions and employee interviews.
7. Encourage employees to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately. How to report such cases is displayed clearly on the staff notice board.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities. Suncrop Limited will ensure that all information provided will be kept confidential and will be dealt with correctly, and that the matter will be investigated fully, appropriately and with sensitivity.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.
10. Randomly interview individual agency workers (with acceptance of the labour provider) on a minimum of 1 per month basis, using ‘Stronger Together’ interview techniques, by trained staff, to ascertain whether they are being or have been trafficked or exploited and then taking the necessary action.
11. Maintain membership of organisation(s) linked to exploitation of migrant labour, in order to keep up with the latest, documents, training, trends and recommendations. Currently this is Stronger Together.
12. Use resources offered by GLAA, ALP and contracted labour providers to maintain up to date knowledge of the wider issues regarding exploitation.

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Richard Hall

Operations Director

20th January 2025