



Basketdrop

Anti-Slavery Policy Statement

Basketdrop Ltd.

Company Number: 11396648

Address: 3 Space International House Business Launchpad, Canterbury Crescent

City: LONDON

Postal Code: SW9 7QE

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.

Basketdrop Ltd. has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the policy

Basketdrop Ltd. has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Basketdrop Ltd. has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy located in our (*Employee Handbook*) as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure , which can be found in the current employee handbook.

This Modern (Anti) Slavery Policy and Statement is intended for businesses in all countries, especially the United Kingdom.

Organisational Structure and Supply Chains

This statement covers the activities of Basketdrop Ltd.

- Basketdrop Ltd. is an agri-tech company that operates a fruit farm in Zambia. It works with a local organisation called Eco Harvest who have a network of 3000 small-holder farmers in Zambia and export food to the U.S. and China.

Countries of operation and supply

The organisation currently operates in the following countries:

- Basketdrop Ltd. operates in Zambia (landlocked country) and exports via South Africa, Tanzania and Namibia.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Eco Harvest are a United Nations (UN) recognized organisation that works with the Zambia government to promote operates in remote communities of Zambia. They are tackling 4 out of the 17 Sustainable Development Goals set out in September 2015 by the UN General Assembly.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Swift payments to the 3000+ small-holder farmers who make up part of our supply chain in rural communities are potentially high risk, we endeavor to make sure that we follow our own Responsible Sourcing Policy that we have put in place.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows [select the relevant areas from the list below]:

- **Policies:** Basketdrop's Responsible Sourcing Policy
- **Risk assessments:** We endorse the 'UN Guiding Principles on Business and Human Rights' in the form of our own 12 fundamental principles that are included in our Responsible Sourcing Policy.
- **Investigations/due diligence:** The CEO, COO and Supply Chain managers will be responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking as set out in our Responsible Sourcing Policy
- **Training:** We have put in place our own 'Supplier Handbook' that will require that all employment contracts contain all our relevant policies that we have set out in our Employee Handbook. Any contracts or terms of sales agreed will have to be signed off by both the workers and the supplier. This will apply to short-term, agency workers, women migrants, the disabled and any young workers.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its Employee and Supplier Handbooks.

- **Whistleblowing policy** Basketdrop Ltd. encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can follow our confidential disclosure form as stated within the employee handbook.
- **Employee Code of Conduct** Basketdrop Ltd. makes clear to employees the actions and behaviour expected of them when representing our organisation. Basketdrop Ltd. strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Code of Conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Basketdrop Ltd. works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. We will use the disciplinary procedure similar to the one we have for our employees.
- **Recruitment/Agency workers policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All recruitment and agency workers will have to adhere to our Employee and Supplier Handbooks.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include the relevant actions from the list below:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- Conducting supplier audits or assessments through Basketdrop Ltd.'s own staff/third party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- Creating an annual risk profile for each supplier;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers via current certifications and legislation required by the relevant authorities and requiring them to implement action plans set out by our supply chain managers.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular that the International Labour Organisation Worst Forms of Child Labour Convention are met; Wages are paid on time and in full & Ensuring that policies on hiring, promotion and termination do not inhibit freedom of association, trade union membership or other associated activities.
- Using a supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Key Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, Basketdrop Ltd. is:

- Requiring all staff/staff working in Zambia/supply chain managers/HR professionals to have completed training on modern slavery by **31/12/2022**;
- Developing a system for supply chain verification in place since **31/10/2022**, whereby Basketdrop Ltd. evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains to be completed by **31/12/2022** whereby the organisation evaluates all existing suppliers.

Training

Basketdrop Ltd. requires all staff/staff working in Zambia/supply chain managers/HR professionals] within the organisation to complete training on modern slavery as a module within the organisation's wider human rights ethical trade training programme.

Basketdrop Ltd. requires all staff/staff working in Zambia/supply chain managers/HR professionals] to sign up to one of a number of training sessions that are being run in **2022-2023** to complete an online training course by **31/01/2023**

Basketdrop Ltd.'s modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, Basketdrop Ltd. will raise awareness of modern slavery issues by distributing flyers to staff/putting up posters across Basketdrop's and encourage our suppliers to the same on their premises and by circulating a series of emails to staff.

The flyers/posters/emails will explain to staff:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline

Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

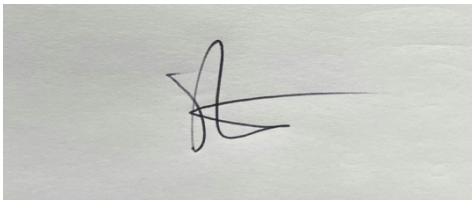
Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Printed and Signed Off By:

Director & CEO
Slydon Lungu

A photograph of a handwritten signature in black ink on a light-colored surface. The signature is stylized and appears to be 'Slydon Lungu'.

05/10/2022