





Grievance mechanisms in agriculture

Lessons and practical insights

Overview

Over the past two years, ETI has led an initiative to strengthen protections for migrant workers in agricultural supply chains in Spain and Italy. Funded by the UK Government's Modern Slavery Innovation Fund, the-project focused on developing and piloting grievance mechanisms that help reduce risks of modern slavery for workers in supply chains linked to UK markets.

Despite challenging political contexts, extreme weather events, and barriers to engagement, the project generated valuable insights, tools, and partnerships that now position ETI and our members to work for further improvements in the sector.

Why this work matters

Migrant agricultural workers in Southern Europe play an essential role in supplying the fresh produce relied upon by businesses and consumers across Europe. Yet many face heightened risks of exploitation, limited access to rights, and few safe avenues to raise concerns.

This project set out to better understand those risks and to identify practical ways to improve access to effective grievance mechanisms. Doing so is critical both for protecting workers and for helping companies meet human rights due diligence expectations. By examining the barriers workers face and exploring what effective, trusted grievance systems look like in practice, the project provides organisations with evidence-based guidance to support meaningful improvements in worker grievance mechanisms.



What we achieved

Primary research – access to grievance mechanisms in Italy and Spain

The project's first phase involved in-depth research across Spain and Italy, including 122 interviews and 8 focus groups with migrant agricultural workers. The findings highlighted key risks facing workers: dependency on employers for housing and legal status, unfamiliarity with rights, limited union representation, language barriers, and widespread distrust of formal grievance systems.

Findings showed that many grievance mechanisms, if they existed at all, were poorly communicated, inaccessible to

those with low literacy or language skills, and often lacked credibility in the eyes of workers. These insights, consolidated in a <u>synthesis report</u> translated into Spanish, Italian and French, reinforce the need for worker-led design, neutral third-party oversight, and attention to gender- and context-specific barriers to access.

The research also led to a set of actionable recommendations for supply chain actors, which were shared with ETI members and external stakeholders. In short, ETI recommends that grievance mechanisms should be worker-centred, based on meaningful dialogue and engagement, and regularly assessed for effectiveness, especially from the workers' perspective. Companies are urged to avoid treating grievance systems as mere compliance checkboxes and instead integrate them as dynamic tools for risk mitigation, accountability, and continuous improvement. Training, support, and collaboration with producers, trade unions, and civil society are essential, as is the need for gender-sensitive, inclusive, and accessible systems that safeguard against retaliation and foster trust. Ultimately, companies should view grievance mechanisms not only as remedial tools but also as catalysts for systemic change and improved working conditions. The research findings were actively shared through a range of high-profile events and platforms. These included a webinar attended by over 120 participants from across business, civil society, and trade unions;

presentations at ETI's Company Group Progress Meeting and the Spanish Ethical Trade Forum; and showcased at the European Economic and Social Committee & SafeHabitus policy seminar "Seasonal and Migrant Workers in Agri-Food Value Chains" held in Brussels and during the 2024 UN Forum on Business and Human Rights. In total, the report has been downloaded 153 times and viewed 258 times on the ETI website. It has also been referenced in meetings with over 30 ETI member companies and shared with multiple UK government departments. This wide engagement reflects strong sectoral interest and positions the findings as a reference point for future work on grievance mechanisms and migrant worker protections.

Grower engagement

Securing grower engagement was one of the project's most persistent challenges, particularly given overlapping audits, compliance fatigue, and limited trust in external initiatives influenced by sensitivity around exposure, increased external scrutiny, and uncertainty about measurable business outcomes. To address this, ETI and its partner Oxfam Business Advisory Service (OBAS) developed a tailored business case for grievance mechanisms, designed to appeal to growers', supplying UK and European markets, practical concerns. The case emphasised how GMs would help contribute to better communication, reduced worker

turnover, and improved productivity while also helping them meet emerging regulatory requirements. Materials were produced in both Spanish and Italian and shared through trusted local partners like the Spanish Ethical Trade Forums (SETF) and Italian suppliers. In Spain, this approach contributed to securing participation from two growers.

Grievance mechanisms pilot

Two grower sites in Spain – one in Almería (Site A) and one in Murcia (Site B) – agreed to pilot worker-centred grievance systems based on the social dialogue methodology. These sites were chosen not only for their relevance to UK-linked supply chains but also because of the trust and relationships already established through SETF, which played a critical role in facilitating their participation.

To keep the process anchored in worker experience, each site formed a Grievance Mechanism Taskforce, made up of both workers and management. These taskforces played a key role in reviewing existing systems, identifying gaps, and developing tailored action plans. The intention for these taskforces is to eventually evolve into formal grievance committees that can oversee and sustain the process over time.

An essential part of the design, outlined in partnership between ETI and OBAS, involved a comprehensive gap analysis, which was facilitated by the project team but led by the taskforces. This allowed both workers and management to evaluate how well current grievance processes aligned with the <u>UNGP effectiveness criteria</u> looking at everything from accessibility and governance to monitoring and learning. A significant finding was the need to improve communication and trust, particularly among field workers and recent migrants who were often left out of formal processes.

Training was a key pillar of the design, with materials developed by OBAS in collaboration with ETI and SETF.

Taskforce members received targeted training to equip them with the knowledge and tools needed to lead change within their respective sites. In parallel, broader training sessions were delivered to the wider workforce. These sessions also included information on SETF's third-party grievance mechanism, Canal Foros, which both growers have joined. Canal Foros is overseen by an independent Ethics Committee that includes representatives from NGOs and trade unions.¹ These sessions didn't just inform workers about grievance mechanisms, they also helped build trust by showing that the process was safe and supported.

Language and literacy considerations were key, with

multilingual materials and visual aids used to ensure everyone could engage meaningfully.

Site A: Almería

Site A is a medium-sized agricultural operation employing around 100 workers, including both Spanish nationals and migrants from countries such as Morocco, Argentina, Romania, Russia, and Mali. Before the project, the site had some grievance mechanisms in place, including an anonymous mailbox, an online reporting channel, and an open-door policy with management. However, there was no formal workers' committee, only a single worker representative.

The project provided support to form a dedicated Grievance Mechanism taskforce, involving both workers and management. The HR Manager played an especially active role, facilitating training sessions and overseeing the development of a tailored action plan. As a smaller company with limited management staff, the HR Manager's dedicated support was instrumental to the project's success, highlighting the value of having a strong champion within the management team, especially at sites with limited

¹ Since early 2024, Canal Foros has trained 2,144 workers across 15 growers, including 185 workers at Site A and 439 at Site B. By 30 April 2025, 46 grievances have been submitted by workers from these 15 growers. Of

these, 31 cases have been resolved through mutually agreed solutions, while 15 remain under active review.

worker representation. Despite early reluctance, the senior leadership including the General Director became engaged after time, even expressing pride in the diverse representation achieved within the taskforce. They committed to evolving the taskforce into a permanent GM committee and embedding it into company governance processes. Early feedback showed workers began to approach the taskforce with concerns, suggesting a shift toward greater openness and trust.

Site B: Murcia

Site B is significantly larger, employing around 1,800 workers during the pilot period, with plans to expand to 2,500. The workforce is notably diverse, encompassing 42 nationalities including Ecuadorian, Argentinian, Bolivian, Moroccan, Nigerian, and Malian workers. Compared to Site A, Site B had a more developed internal structure, with seven production centres and three existing workers' committees made up of 60 elected representatives. However, the representation skewed toward Spanish workers, with migrant voices underrepresented.

Here, the project focused on enhancing the effectiveness and accessibility of existing grievance structures. The GM taskforce was built upon the current committees, and management supported the process while allowing workers space to lead discussions. Given that the company already had a system of working with worker representatives (compared to site A), the HR Director purposefully kept a low profile during training to foster openness among workers.

The site committed to long-term improvements, including integrating grievance training into the induction process for new workers and expanding the taskforce to ensure better representation of migrant and female workers.

Each site produced detailed action plans to strengthen their grievance systems. These included actions to improve accessibility, trust, and responsiveness. Workers began to engage more actively with the taskforces. Some previously unreported concerns began to surface, indicating a shift toward greater openness and trust.

Quotes from grower management representatives on their involvement in the project:

"At first, there was reluctance to implement the project... but now its value is recognised."

"One of the greatest achievements and something that the director is very happy about is the fact that different profiles of workers have been involved within the work group."

"The company will work on the action plan and provide the greatest clarity to the workers about the process to be followed..."

Building on insights from this project, as well as prior work by OBAS and AIM-Progress on grievance mechanisms across various supply chains, the three organisations will jointly publish and freely disseminate a learning paper that distils shared insights from their respective grievance mechanism initiatives. The paper will highlight what it truly takes to design and implement effective mechanisms, emphasizing their transformative potential across diverse contexts.

Recommendations based on insights from the GMA pilot GM process:

Strategic-level recommendations

- Reframe grievance mechanisms as tools for empowerment and continuous improvement, not just compliance.
- Embed GMs into company culture by securing senior management buy-in and integrating them into everyday business operations.
- Support supplier ownership by offering sustained guidance, resources, and technical support (e.g. using the OBAS Grievance Mechanism Toolkit).

Worker-centred design

- Involve workers from the start in the design and implementation of GMs via:
- Trade unions and their representatives when possible as a first option.
- Grievance Mechanism Taskforces (with equal workermanagement representation)
- Grievance Committees for ongoing oversight

- Worker-appointed grievance officers
- Ensure diverse representation, including migrants, women, and temporary staff, through democratic election of worker reps.
- Address trust barriers by making grievance systems safe, anonymous, and clearly communicated to all workers.

Practical implementation steps

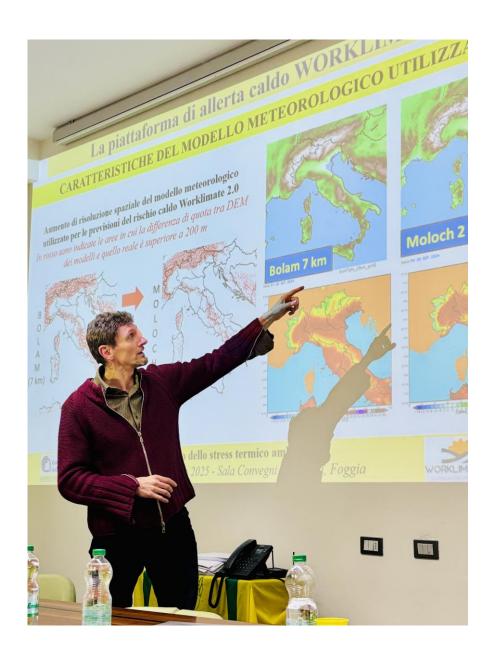
- Conduct a gap analysis of existing mechanisms with worker involvement.
- Offer multiple reporting channels (e.g., boxes, hotline, app, verbal reporting) to suit different literacy, language, and comfort levels.
- Provide training for workers, managers, and grievance officers on rights, GM procedures, and safe reporting.
- Introduce gender-sensitive practices, such as female grievance officers and private spaces for sensitive disclosures.

Monitoring, learning, and adaptation

- Establish KPIs and tracking systems to monitor grievance volume, types, resolution rates, and response timelines.
- Regularly review and adapt GMs based on worker feedback and incident data.
- Publish and communicate outcomes to build trust and show responsiveness.
- Include workers in evaluation to strengthen ownership and transparency.

Ecosystem and stakeholder engagement

- Engage civil society and trade unions in both the design and implementation processes to support local relevance, training, and trust-building.
- Leverage local partners who understand the cultural and legal context.
- Foster collaboration between brands and across sectors, ideally using locally established multistakeholder platforms, to harmonise grievance approaches and share learning.



Project activities in Italy

While the project initially aimed to pilot a new grievance mechanism in Italy, this objective had to be revised due to persistent challenges in engaging growers. However, several meaningful outcomes were still achieved through strategic adaptation and targeted awareness-raising.

Rather than designing a new mechanism, the project partnered with the Helpdesk Anti-Caporalato, a national grievance platform for agricultural workers operating in Italy's five southern regions. The project helped enhance awareness of the Helpdesk among both workers and businesses in the Foggia area in Puglia, including through tailored training sessions targeting migrant workers working for growers supplying a major tomato processing company.

This collaboration strengthened the Helpdesk's capacity to engage private sector actors, an area it stated was previously underdeveloped, and led the initiative to better incorporate business engagement as a strategic priority in its new five-year plan.

Recognising the growing impact of climate change on agricultural labour, ETI in collaboration with Oxfam Italia and the Italian grower association Coldiretti convened a well-attended workshop in Foggia, Puglia in February 2025, focused on protecting workers from extreme heat.

Contributions from researchers from the Italian initiative Worklimate 2.0 were instrumental in deepening discussions.

This initiative, a collaboration between the Italian National Institute for Insurance against Accidents at Work (INAIL), the National Research Council and the University of Bologna among others, aims to develop preventive strategies and tools for managing occupational heat risks.

Over 35 participants, including growers, cooperatives, trade unions, and NGOs, joined the session to explore practical responses to rising temperatures and heat-related health risks. The workshop served as an effective entry point to engage local growers on worker welfare. Key recommendations emerging from the discussion included better hydration access, multilingual heat safety materials, reintroduction of health monitoring systems, and improved coordination among stakeholders.

The event not only fostered dialogue but also provided an entry point to form a platform for further trust-building and meaningful stakeholder engagement in a region where such engagement across actors has historically been limited. Workshop participants agreed that additional meetings among sector stakeholders in Foggia including grower and supplier representatives, trade unions, and NGOs would be beneficial for coordinating training on heat stress prevention for vulnerable workers ahead of the summer.

Future initiatives could benefit from ongoing multistakeholder coordination.



Digniwork

A cornerstone of the project was the creation and development of Digniwork, a cross-national civil society network spanning Morocco, Tunisia, Côte d'Ivoire, Spain, and Italy. Digniwork was established to connect organisations working along the migration route with the aim of promoting migrant worker rights and supporting access to grievance and remediation systems from countries of origin to destination.

Following stakeholder mapping and consultations carried out by the project partner, Partner Africa in 2023, Digniwork was officially launched in March 2024. National meetings were held in each participating country, leading to the nomination of local co-leads and the formation of a regional coordination committee. A founding workshop in Rabat in 2024 enabled members to co-create the network's mission and strategic objectives as well as to agree on the network name.

By January 2025, the network had finalised its governance structure and adopted operating procedures, including clear membership criteria and an agreed action plan. Legal options for network registration were explored, laying the groundwork for long-term sustainability beyond the project's lifecycle.



Digniwork has served as a platform for both structured and informal collaboration.

Activities included:

- Three thematic webinars on migrant rights, grievance mechanisms, and decent work.
- Regular cross-country exchanges via WhatsApp and email, used by members to share resources and coordinate support.
- Two additional national meetings held independently by local members in Côte d'Ivoire and Morocco, demonstrating ownership and initiative.
- Participation in a regional workshop where members assessed the quality of engagement and identified priorities for improvement.



Digniwork also facilitated some limited direct support to migrant workers, showcasing the possibilities for the network in the future. For instance, Ivorian members successfully collaborated with Tunisian colleagues to help resolve administrative blockages affecting Ivorians stranded in Tunisia, an example of how network trust and rapid communication channels translated into concrete impact.

Surveys and interviews with members carried out by the project's external evaluators indicated that participation in Digniwork:

- Improved understanding of grievance mechanisms, access to remedy, and decent work principles.
- Increased regular communication between organisations across borders (from 39% to 61% reporting regular international contact).
- Enhanced members' visibility, confidence, and credibility in their respective regions.

Members consistently highlighted that trust, flexibility, and informality were key to the network's success. The role of WhatsApp in enabling regular, informal exchanges was repeatedly cited as crucial in maintaining engagement, especially for smaller, volunteer-driven groups.

While the formal project period has ended, Digniwork is positioned to continue as a community-led platform. ETI and Partner Africa have transitioned responsibility for coordination to the network itself but remain available to support future collaboration, visibility, and resourcing efforts. Digniwork now stands as a promising example of bottomup, cross-border collaboration aimed at tackling the structural drivers of migrant worker exploitation.

Work group activities

A 23-member project work group comprising of UK and European retailers and suppliers was established at the outset to provide input on project direction, share learning, and support dissemination. While the work group offered an important platform for dialogue, engagement levels varied, with participation fluctuating over time due to competing priorities and limited resources. Despite these challenges, the project still saw positive signs of influence on corporate awareness and disclosure. Toward the end of the project, a short survey and external evaluation revealed that:

70% of participating companies reported an increased contribute to modern slavery risks in agri-food supply chains.

Of the 13 work group members required to publish modern slavery statements under UK legislation, 10 had released statements for 2023 that identified Spain and/or Italy as regions of risk and referenced their involvement in the project. For the relevant statements issued in 2024 for the prior reporting period, all mention the supply chains in Spain and Italy as regions of risk and mention their respective company's involvement in the project as a mitigation strategy for these risks.

In interviews and surveys conducted by the external evaluators, members shared several ways in which the project enhanced their understanding and approach, including:

- Gaining examples of best practices to share with other suppliers and across regions
- Enhancing internal resources on GMs
- Recognising the importance of engaging worker representatives and promoting direct worker participation, particularly where formal representation is limited, to ensure meaningful involvement.
- Understanding the time and effort required to implement GMs effectively, highlighting that this is not a

- tick-box exercise, but a long-term process that informed expectations across other supply chains
- Developing a clearer idea of how a GM should be designed, enabling assessment and improvement of existing systems among suppliers (and not limited to agriculture)
- Realising the importance of involving and building the capacity of local stakeholders (e.g. civil society organizations) to support an enabling environment for GMs
- Identifying key areas for further focus and development

A subset of four companies also joined a focused initiative on responsible purchasing practices (RPP), through which they explored internal procurement systems and reflected on the unintended labour impacts of conventional buying behaviours. While still at an early stage, this work laid the foundation for more informed and responsible sourcing strategies and will contribute to ETI's wider sector guidance on RPP.

Overall, while the work group's collective engagement had limitations, the project created valuable entry points for company reflection and seeded momentum toward more risk-aware and rights-based business practices.

Quotes from work group supplier members:

"Participating in the project helped our business understand the characteristics of modern slavery and forced labour in Spain & Italy agriculture supply chains, as well as bringing insight relating to the nature of migrant labour in departure countries. The partnership with the Spanish Ethical Trade Forum was innovative and hugely valuable in raising awareness and embedding tools to address the risk in this supply chain.

Our business is determined that the human rights of every individual in our supply chain are respected and protected. Forced labour risk cannot be 'fixed' by any single organisation. This programme brought together a broad range of industry and other stakeholders with that aim in mind, and the insight and tools generated will contribute to us achieving this goal."

"This project offered valuable insights into the necessity of implementing effective grievance mechanisms to safeguard migrant workers, who frequently face significant human rights abuses. While the project's impact varied across different regions, a two-year timeframe is insufficient for achieving substantial change. I hope the project could have been extended to yield more successful results in certain areas."

Key challenges and how we responded

Throughout the project, we encountered several challenges, some expected and others less so, that shaped how the work unfolded. While they occasionally slowed progress or shifted our approach, they also offered valuable insights and lessons in adaptability.

A consistent challenge across both Spain and Italy was low participation from growers, especially in Italy. Factors included audit fatigue, competing priorities, and lack of trust stemming from concerns about exposure, top-down scrutiny, and an unclear connection to tangible business value. In response, we adapted our engagement strategy developing bilingual business cases, working through trusted intermediaries like SETF, and tapping into shared concerns (such as heat stress) as practical entry points.

Extreme weather events, including heatwaves and flooding, delayed both grower outreach and harvests. These conditions made planning unpredictable and disrupted participation. The project responded by rescheduling sitelevel research visits and workshops, and by emphasising environmental risks as a shared priority between employers and workers, particularly through the Foggia heat stress workshop.

The project's two-year timeframe, combined with delays in initial research and supply chain mapping, meant that full piloting and follow-up evaluation were compressed. While this limited the opportunity to observe long-term results, we focused efforts on capacity building, tool development, and securing post-project commitments to carry the work forward.

Evaluating the impact of the project presented several limitations. The short window to carry out the pilot in Spain

with implementation beginning late in the project cycle meant that only early-stage results could be captured, and long-term impact on worker outcomes or grievance resolution processes could not be fully assessed.

There were also challenges in gathering representative feedback. Surveys and interviews relied on voluntary participation, often during busy harvest periods, and tended to engage more confident or long-standing workers. This created a self-selection bias, with newer or more vulnerable workers likely underrepresented in the data.

Key lessons

Relationship building takes time – but yields the greatest value

One of the clearest insights from the project is that meaningful change in supply chains hinges on trusted local partnerships. In Spain, success was driven by our collaboration with SETF. In contrast, weaker local networks in Italy made engagement more difficult. Future efforts must intentionally plan for relationship development, allowing time and resources for trust-building with suppliers, civil society, and grower associations.

Business engagement must start earlier – and be co-designed

Grower engagement was a persistent challenge. Any organisation seeking to implement effective GMs in these contexts should involve growers from the outset, by codeveloping the business case for grievance mechanisms. Doing so could have led to stronger buy-in and more aligned expectations. Companies looking to replicate this work should consider developing business cases that reflect real grower incentives, such as workforce stability, legal compliance, and climate-related worker welfare (e.g. heat stress management).

Grievance mechanisms as catalysts for change: inclusion, ownership, and time matter

A mindset shift is required by all actors: GMs must be viewed as enablers of positive change, not mere compliance tools. Moreover, support from companies and other key supply chain business actors is non-negotiable for effective adoption at supplier level.

The project affirmed that grievance mechanisms work best when co-designed with workers. However, we also learned that participation must be inclusive of the most vulnerable such as new migrants, field workers, and those with limited literacy or language fluency. Reaching these groups requires tailored approaches, additional time, and sustained engagement beyond a project cycle. Adaptable tools like the <u>OBAS Grievance Mechanism Toolkit</u> developed for Reckitt, are useful to support this process including supporting worker-led monitoring and committees

Support to the effectiveness of grievance mechanisms also need to deepen the engagement with company senior management and work towards embedding grievance systems in day-to-day workplace culture.

Narrower scope, deeper impact

The project was ambitious in attempting to operate across two countries and a vast migration corridor. A more geographically focused approach such as working exclusively within one supply country and one migration route may have enabled deeper operational impact and more consistent relevance for UK businesses.

Systems thinking strengthens strategy

Applying a systems-thinking approach including mapping power dynamics, stakeholder incentives, and supply chain rhythms would have improved early project design.

Understanding the full ecosystem (e.g. seasonal production

cycles, trade union capacities, or existing national grievance tools like the Helpdesk in Italy) is critical for identifying the right entry points and levers for change.

Don't underestimate the intangibles

Many of the project's most important achievements – trust, worker confidence, civil society collaboration – are difficult to quantify but essential to long-term progress. These "soft outcomes" need to be better recognised, resourced, and measured in future reporting and project design. For companies, this means valuing ongoing engagement and partnership-building as strategic investments, not ancillary costs.

Aligning civil society networks with business needs

The Digniwork network made great strides in cross-border coordination but may have had greater traction with business actors if more closely tied to a clearly defined migration corridor (e.g. Morocco to Spain). This suggests future multi-stakeholder initiatives should be anchored in real supply chain journeys to increase business relevance.

Trade union engagement needs to be prioritised early

Despite good intentions, the project struggled to obtain and maintain trade union involvement both locally and centrally, often due to capacity constraints as trade union representatives are already operating at full workload, with minimal ability to reallocate or add resources for new initiatives on short notice. Their role in worker protection is critical. Future efforts should secure union engagement during the proposal stage, not after implementation begins.



Final reflections

The project piloted two worker-centred grievance mechanisms in Spain, strengthened visibility of existing services in Italy, and launched Digniwork, the first regional civil society network spanning key countries of origin and destination for migrant agricultural workers. Over 100 workers and managers received training on effective grievance systems, and a set of adaptable multilingual tools were developed to support broader use.

Research findings were disseminated through high-profile webinars and events. The project helped participating members better understand and respond to the risks existing in two key European sourcing countries and the continued need to work on ensuring the effectiveness of grievance systems.

Key learning outcomes

We learned that trust-building with growers and civil society is non-negotiable and takes time. Grievance mechanisms are only effective when workers, especially the most vulnerable, are genuinely involved in their design. Cocreating business cases with growers from the outset can help align values and increase participation.

We also saw that abstract notions like "grievance mechanisms" need to be made tangible through practical training, clear language, and accessible channels. The most transformative changes often came through "soft" outcomes: confidence among workers to raise issues, informal collaboration between civil society partners, and shifts in how companies talk about risk. These may be hard to measure but are critical to progress.

Interviews with migrant workers powerfully reinforced the need for this project and shed light on the persistent challenges in the sector. These insights gave us a strong foundation to engage with broader audiences and share the voices of those too often unheard.

The pilot phase revealed a clear gap in both evidence and innovation around grievance mechanisms, especially for those most vulnerable. It underscored the critical need to involve growers and ensure workers, particularly field workers, are at the heart of design and implementation.

A major milestone was launching Digniwork, the first regional civil society network focused on supporting migrant agricultural workers with members reporting stronger capacity and deeper knowledge at the end of the project.

Despite challenges like limited grower engagement and climate-related disruptions, the project found new, collaborative ways forward. Through strong partnerships and shared learning, we turned obstacles into opportunities.

These insights provide a practical foundation for any organisation committed to improving grievance mechanisms in high-risk agricultural supply chains.

We extend our sincere thanks to all working group members and implementing partners Oxfam Business Advisory Service, Partner Africa and Spanish Ethical Trade Forum for their continued support, insight, and commitment throughout this journey, you have been key to making this work a success.





For human rights, for better business

The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe.

Our vision is a world of work that protects human rights, ensures dignity for all, provides opportunity and is free of exploitation and abuse.

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