Modern slavery statement for financial year 2024

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Zwanenberg Food Group UK Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Zwanenberg Food Group UK Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings. We put effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Zwanenberg Food Group UK Ltd comprised 2 manufacturing divisions in the UK during 2024, employing more than 500 people and with over 300 suppliers. We pride ourselves in manufacturing our food products to the highest standards of quality and food safety. We make a wide range of food products, most of which are sold in the UK. Our products are brought to market under several brands owned by us or our customers.

Zwanenberg Food Group UK Ltd is owned by Zwanenberg Food Group BV, the Netherlands.

Our high risk areas

The two areas of our undertakings that we consider to be higher risk involve employment of temporary labour via an employment agency in the UK and the supply of goods from outside of the UK.

We have regular review meetings with our suppliers of temporary labour to ensure legal and ethical compliance. We use employment agencies of significant scale and sound repute.

When sourcing goods from outside the UK we aim to use only suppliers, who are based in the EU and are well known. We carry out regular audits on the suppliers of goods specifically involved in the manufacture of our products.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Ethical policy. We are aware, recognise and work towards the ETI (Ethical Trading Initiative) base code as the benchmark for our ethical trading. As part of our SEDEX membership we carry out full

SMETA Ethical Audits as required and complete all recommended action. It is expected that this Ethical Audit process will be completed on a bi-annual basis.

3. Whistleblowing policy. All employees are made aware that they can raise concerns about treatment of colleagues and other stakeholders, practices within our business or supply chain without fear of reprisals.

Our Suppliers

Zwanenberg Food Group UK Ltd operates a supplier policy and maintains an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. Raw materials are only sourced from approved suppliers.

The due diligence process requires prospective suppliers to complete our 'Supplier Approval Documentation' which asks them to demonstrate their awareness of the 'ETI Base Code', if they have an Ethical Trading policy, if they are registered to a third-party Ethical accreditation and if the supplier is prepared for us to create trading relationship with the third-party accreditor. Where possible a copy of the policy will be retained by Zwanenberg Food Group UK Ltd.

Where a supplier does not clearly complete the documentation or confirms they do not have an ethical trading policy further assessment is made to ensure they are compliant with the ETI Base Code.

We may terminate the contract at any time should any instances of modern slavery come to light.

Training & Future Development

Senior members of the Company have attended modern slavery workshops. We continue to review opportunities to conduct training for our management teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our business, workforce or supply chain. We are also progressing with our recognition and support of the "Stronger Together" initiative.

Approval for this statement

This statement was approved by the Board of Directors on 23 April 2025

Name (Director): **Jonathan Ashmore**

Signature:



Date: **23rd April 2025**