



SAMWORTH BROTHERS Modern Slavery Statement

Release date: June 2026

Period covered: January to December 2025

**SAMWORTH
BROTHERS**

Food & Family since 1896

INTRODUCTION

Samworth Brothers recognises the risk of, and need to combat, modern slavery in all its forms. Our operations impact workers both within our UK business and throughout our supply chains.

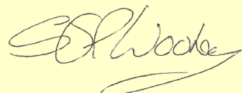
We strongly believe in championing human rights, and we're committed to making sure that everyone who works for, with, or adjacent to our business is treated fairly. Our Responsible Sourcing Policy, Human Rights Policy and this statement outline our commitment and approach to human rights due diligence. Our commitments reference the United Nations (UN) Guiding Principles on Business and Human Rights and the Ethical Trading Initiative (ETI) base code.

The UK Modern Slavery Act 2015 requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. This statement outlines the progress Samworth Brothers (Holdings) Limited has made during the financial year ending 27th December 2025 and sets out the steps taken by our business to prevent modern slavery and human trafficking in our own operations and our supply chains.

This statement is produced for Samworth Brothers (Holdings) Limited and covers the following legal entities:

- Samworth Brothers (Holdings) Limited
 - Gibbs Croft Limited – trading as Soreen
 - Perfect Redd Limited
 - Samworth Brothers Limited:
 - Bossam Holdings Ltd – trading as Freshways
 - Manton Wood Limited
 - Real Wrap Limited
 - West Cornwall Pasty Co. Limited

This statement was approved by the Group Holdings Board.



Chief Executive Officer

23rd June 2026



OUR BUSINESS

Overview

Samworth Brothers is a fourth-generation family business producing high quality chilled and ambient foods enjoyed by millions of people across the UK every day. Since 1896, the business has continually evolved. What started as a one-man pig dealing firm founded by George Samworth, is today one of the UK's largest food manufacturers.

We make an extensive range of quality foods, from sandwiches, prepared meals and savoury pastries to salads, cooked meats, sausages and the iconic malt loaf. The group owns several popular brands including Higgidy, Soreen, Ginsters, Urban Eat, Dickinson & Morris and the West Cornwall Pasty Co. Additionally, the group owns several businesses that focus on service provision, these include Samworth Brothers Supply Chain (SBSC) and Food for Now Company that provide logistics services, and also a food safety testing laboratory Westward Laboratories.

Culture and Values

Our culture at Samworth Brothers is special; our purpose 'We do good things with great food' is at the core of everything we do, underpinned by three company values: We are a family, We take pride, We make things happen.

Our 'we are a family' value means we welcome, appreciate, and encourage each other, no matter who we are or where we're from – we're proud to employ colleagues of over 100 nationalities. Our commitment to diversity and inclusion ensures that every colleague's voice can be heard. We're powered by trust and respect, so everyone can be open and honest with one another.

We celebrate our colleagues individually and collectively, through The Samworth Way workshops where managers and colleagues are encouraged to share stories about the way they've seen our values come to life.

Our Supply Chain

Our supply chain is global, and we continually aim to strengthen our approach to anti-slavery due diligence. The products we purchase fall into three major categories: ingredients, packaging, and indirect goods and services. We currently source several thousand ingredients from the UK and around the world, including meat, produce, dairy, bakery items and herbs and spices.



OUR POLICIES AND GOVERNANCE

Policy

Our approach to addressing modern slavery sits within our broader approach to human rights and is supported by our Human Rights Policy and Responsible Sourcing Policy, which set out our obligations to customers, colleagues and communities in our own operations and our supply chain and outline our commitment and approach to human rights due diligence.

Our Human Rights Policy is built on the Ethical Trading Initiative (ETI) base code and sets out requirements for our manufacturing sites, including SMETA (SEDEX Members Ethical Trade Audit). At the heart of our approach to human rights are several important internationally recognised declarations, standards and codes, including: The UN Universal Declaration of Human Rights, The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, The UN Guiding Principles on Business and Human Rights, and The Ethical Trading Initiative (ETI) base code.

Our Responsible Sourcing Policy sets our key expectations for supply partners, including human rights. It outlines our minimum requirements but also explains our approach to work more collaboratively so that collectively we can make a larger positive impact. Our Policy defines our expectations for our direct (tier one) suppliers of ingredients, packaging and selected indirect categories. We ask that our suppliers follow the standards that are contained in the ETI base code, register with SEDEX (Supplier Ethical Data Exchange) and have policies and processes in place to proactively manage human rights risks throughout their supply chains. Our standard terms and conditions of purchase require adherence to this policy.

Where any non-compliances are identified, Samworth Brothers approaches remediation in an open and transparent manner and aims to collaborate with its supply partners to resolve issues rather than terminating business relationships. This ensures issues are addressed and any workers impacted obtain access to remedy. Other policies are in place that support our business to combat modern slavery, both within our business and supply chain, including: Bribery & Corruption Policy, Modern Slavery and Forced Labour Policy, Bullying and Harassment Policy, Right to Work Policy, Equality and Diversity Policy, Whistleblowing Policy.

Governance

The Group's corporate purpose and Sustainability strategy are established by the Group Executive Board (GEB) and approved by the Group Holdings Board (GHB), ensuring alignment with the Group's long-term business strategy and principal risks. The GEB holds overall accountability for the delivery of the Sustainability strategy and monitors performance against defined ambitions and targets. Responsibility for each of the strategic pillars; People, Planet and Products, is allocated to individual GEB members.

A Sustainability Oversight Committee, comprising senior representatives from across the business, supports the GEB by providing structured oversight of sustainability performance, risks and opportunities. The Committee meets twice a year to review progress against targets, assess emerging risks and regulatory developments, and ensure alignment with external reporting requirements and internal control processes.

Reporting to the Sustainability Oversight Committee are six Sustainability Forums, which provide cross-functional governance and operational oversight. Covering Responsible Sourcing, People & Ethics, Carbon, Food Waste, Packaging, and Healthy & Sustainable Diets, the forums meet quarterly to review performance data, coordinate delivery plans, and develop recommendations for escalation.

Day-to-day management, data coordination and implementation of sustainability initiatives are led by the Sustainability Director, supported by the wider Sustainability team. This includes monitoring performance metrics, supporting internal reporting processes, and enabling consistent data collection and controls across the Group.



ASSESSING RISK

Our supply chain is complex and international, and we are aware of the risk of modern slavery.

As part of our due diligence, we complete a risk assessment of our ingredient supply chain to identify supply chains with the greatest risks so we can focus our efforts.

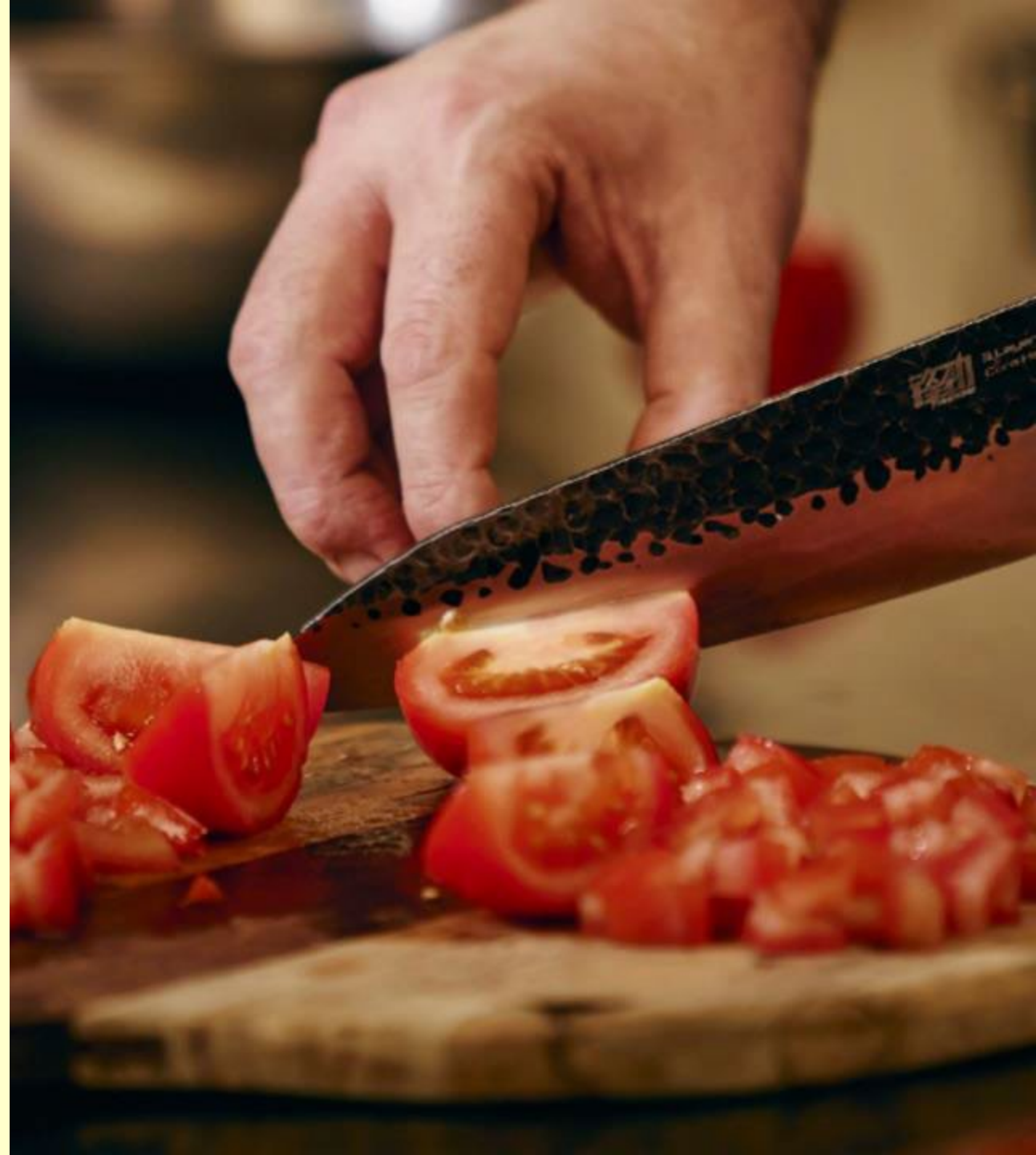
We use the Food Network for Ethical Trade Human Rights Risk Assessment Tool, which includes various data sources including the U.S. Department of Labour, the Walk Free Foundation, and the International Trade Union Confederation. We are then able to establish which ingredients have the greatest human rights risks, based on country of origin and ingredient specific metrics provided.

Our risk assessment has identified the following areas of higher risk products: poultry, produce, seafood and herbs and spices. We continue to work with our supply partners to map and understand these supply chains further.

We also use data from SEDEX and individual suppliers to ensure the most accurate picture of the risk profile is presented.

The outputs from our risk assessment are utilised to complete the Sustainability function risk register, directly feeding into the Group's risk management process. Our broader risk process helps us to identify human rights related risks and is refreshed on an annual basis.

“Responsible Sourcing” is highlighted as a principal risk within our Group risk management process. Exploitation of workers and human rights breaches are the key drivers of this risk. We update on current and future risks, progress and performance, to the Group Risk Management Committee on at least an annual basis.



MANAGING AND MITIGATING RISK

Our business operations

Within our manufacturing businesses, we are a member of SEDEX and are audited to the SEDEX Members Ethical Trade Audit (SMETA) standard.

All of our manufacturing facilities are registered on SEDEX and have undergone periodic semi-announced SMETA audits. We address and resolve any non-conformances. Our Human Rights Policy requires all our operations to be subject to third-party ethical audits every two years.

The majority of our workforce are employed on permanent contracts. However, to respond to the peaks and seasonal variance in food manufacturing we partner with several GLAA registered labour providers. We have long standing relationships with our key recruitment providers, and they have robust onboarding and induction processes that highlight how to identify modern slavery to all workers. Additionally, we conduct regular audits of our recruitment providers as part of our due diligence in this area.

We encourage our people, customers, and other business partners to report any concerns related to ethical issues, within our business. This includes highlighting any red flags that could be indicators of modern slavery. Our Whistleblowing Policy is prominently displayed at all sites in areas people frequent. This provides details of our confidential, independent hotline which individuals can use to highlight any concerns they may have.

We worked with Slave-Free Alliance to develop our incident response process, to ensure robust management if ever a concern is raised. This has helped to ensure we have created a robust process that is appropriate for our own operations.

We have promoted Stronger Together since 2013. Stronger Together is a multi-stakeholder initiative aimed at tackling modern slavery in supply chains.

Our company induction includes how to spot the signs of modern slavery and how to report it. Stronger Together forms part of this induction for all permanent and agency colleagues.

We have focused on training incident response teams at sites. We worked with an expert trainer who helped us design and deliver training. Content included an overview of what modern slavery is and its prevalence in the UK. Information was provided on how to spot the signs of modern slavery including case studies. Specific training was given on the Samworth Brothers incident response procedure, including an incident response exercise. In 2025, we trained 98 colleagues, with further training planned for 2026.



MANAGING AND MITIGATING RISK

Our supply chain

Samworth Brothers is committed to operating in line with the United Nations Guiding Principles on Business and Human Rights. We recognise our responsibility to identify, assess and address modern slavery risks within our supply chain.

Our approach to monitoring modern slavery risk is structured around four key stages:

- **Identify:** We map our supply chains to understand where risks may arise, considering both the nature of raw materials and the geographic regions from which they are sourced. This risk mapping is supported by a leading supplier management platform, which enhances our supplier approval processes, risk assessment capability and supply chain traceability. We also utilise Supplier Ethical Data Exchange (SEDEX) to access supplier ethical data and strengthen our understanding of human rights risks.
- **Prioritise:** Using these insights, we focus our efforts on the areas of highest risk, ensuring that resources are directed where they can have the greatest impact. This includes monitoring country-specific human rights risk indicators and supplier risk profiles within our systems.
- **Act:** We work collaboratively with suppliers and relevant stakeholders to address identified risks. We require key suppliers, including direct suppliers (food manufacturing sites, packaging suppliers and agents), and relevant sites operating via agents, to link with us on SEDEX and complete the Self-Assessment Questionnaire. We monitor ethical audit data through SEDEX and proactively engage suppliers to drive improvements. Indirect suppliers are onboarded to SEDEX on a case-by-case basis where appropriate.
- **Monitor and Review:** We track progress through defined KPIs, including the proportion of direct suppliers linked to SEDEX, and integrate SEDEX data and country-of-origin risk metrics into our supplier management platform. We maintain dedicated group-level resource to oversee ethical trade risk management, support supplier engagement, and ensure that appropriate corrective actions are implemented. Outcomes are regularly reviewed to assess effectiveness and drive continuous improvement in our approach.



COLLABORATION

Partnerships

Modern slavery and human rights violations are global issues that we cannot tackle in isolation. Therefore, we work closely with our suppliers, customers, and peers to identify issues.

Food Network for Ethical Trade:

We were founding members of the Food Network for Ethical Trade (FNET). FNET is an initiative made up of UK-based suppliers and retailers whose mission is to improve human rights in global food supply chains through a common approach to managing ethical trade. We co-lead an FNET working group to develop common due diligence tools; the working groups are collaborative forums that allow members to develop common approaches to ethical trade.

Slave Free Alliance:

Since 2019 we have partnered with Slave-Free Alliance - a social enterprise and membership initiative launched by anti-slavery charity and victim advocacy organisation Hope for Justice.

Modern Slavery Intelligence Network:




Samworth Brothers are also founding supporters of the Modern Slavery Intelligence Network (MSIN), a pioneering non-profit collaboration in the UK food and agriculture sector.



OUR PROGRESS

KPIs

We track progress through a number of metrics which monitor our due diligence activities.

Measure	Target	Status	Progress
Independent Ethical Audit: all Samworth Brothers manufacturing sites to have an ethical audit every 2 years	100%	100% *	
Supplier SEDEX Registration: Direct food, agents and packaging suppliers registered	100%	91%	
Number of colleagues trained on modern slavery incident response procedure	N/A	98	

* Higgidy SMETA completed January 2026

Plans for 2026

We will continue to evolve our approach to managing human rights and modern slavery risk through the following actions:

- 1. Raising awareness in our own operations:** we will increase our awareness raising activities on modern slavery through the delivery of bespoke materials and media within our sites.
- 2. Incident Response Training:** we will continue to train more colleagues in our Incident Response Procedure.
- 3. Procurement Training:** we will utilise the FNET Procurement training with our Procurement Team.
- 4. Supplier Engagement:** we will utilise the IGD Food Sustainability Supply Chain Framework with suppliers, to benchmark performance on key sustainability indicators, including human rights.
- 5. Review and develop our key performance indicators:** we will increase our KPIs to monitor risk in our supply chain.

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