



# Modern Slavery Statement (UK)

## Organisation

This statement sets out the steps taken by Kepak Group Limited (“Kepak”), across all United Kingdom (UK) sites, to prevent, identify and address the risks of modern slavery and human trafficking within our business operations and wider supply chain. It is made pursuant to section 54 of the Modern Slavery Act 2015.

As a major employer within the FMCG sector, supplying Beef and Lamb through our Meat Division UK and Rustlers and other products through our Foods Division, Kepak recognises its responsibility to adopt a robust, transparent and proactive approach to preventing modern slavery and labour exploitation. This statement applies to all UK sites: Aberdeen, Bodmin, Kirkham, Preston, Merthyr Tydfil, New World Foods York and Wigan.

### Definitions

Kepak considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being treated as a commodity, bought or sold
- being physically constrained or to have restriction placed on freedom of movement or communication



Over 2200+ Permanent UK employees

Over 3500+ Approved Suppliers



## Governance and Responsibility

Preventing modern slavery is the responsibility of every employee, contractor and supplier working with Kepak. Overall accountability for this statement sits with the UK Senior Leadership Team, with operational responsibility delegated to the designated Senior Manager and HR Manager/Representative at each UK site.

Kepak maintains clear governance structures to ensure:

- consistent implementation of policies
- regular review of risks
- escalation of concerns
- transparent reporting

Modern slavery is a standing agenda item within the UK HR function and site operations teams, ensuring alignment, shared learning and continuous improvement.

## Our Commitment

Kepak acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Kepak understands that this requires



an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

No labour provided to Kepak in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Kepak strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

Kepak is fully committed to ensuring there are no modern slavery, or exploitation practices present within our own operations or the operations of those we work with. This commitment forms part of the Kepak Core Values, falling under our "Responsibility" pillar, and is a key element of our corporate social responsibility agenda.

To assist with continued alignment across all our UK sites, Modern Slavery is discussed regularly within the UK HR function. The site operations team (which includes HR representation) also ensures the site approach to resourcing supports our Modern Slavery Statement. Both teams share concerns and best practise to ensure proactivity in managing conformance to our Modern Slavery Statement.

## Our Supply Chain

Kepak does not enter business with any other organisation, in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. Kepak has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.



Kepak undertakes processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers. We regularly appraise and improve our approach to identifying modern slavery through technical and traceability systems which we implement throughout our supply chain. Ensuring our partners share our beliefs is a fundamental part of our onboarding process.

With a network processing raw material from across the UK and Europe we ensure all suppliers of goods and services have been initially assessed in terms of their compliance to the Modern Slavery Act through our Vendor Assessment Questionnaire (VAQ) and Labour Provider Self Audit Questionnaire (SAQ).

To add further visibility and security to our processes, all suppliers are encouraged of become members of SEDEX (Supplier Ethical Data Exchange) and share knowledge around their practices. Kepak have an ongoing membership to SEDEX which strengthens our supplier index and own best practices.

## Due Diligence and Risk Management

In accordance with section 54(4) of the Modern Slavery Act 2015, Kepak has taken the following steps to ensure that modern slavery is not taking place at any of our UK sites:



- Stringent and consistent recruitment processes, right to work and identity checks
- Regular review of Labour Provider Self Audit Questionnaires
- Regular audits of Labour Providers and regular follow up actions where required
- 'Stronger Together' information and training included in Company Induction and management training



- Modern Slavery discussions at employee forums
- Active engagement with recognised Trade Union(s) on Modern Slavery
- 'Stronger Together' trained HR team and managers, with additional/refresher training as required
- 'Stronger Together' signage across sites in various languages encouraging staff to report any wrongdoing or concerns
- Regular payroll and employee file audits
- Continual improvement to embed Modern Slavery awareness and best practice across all UK sites
- Confidential reporting channels for raising concerns

## Training and Awareness

Kepak provides ongoing training to ensure employees and managers can identify signs of modern slavery and know how to respond. This includes:

- 'Stronger Together' accredited training
- Refresher training for HR and Operational Managers
- Targeted training for those involved in recruitment, procurement and supply chain management

## Continuous Improvement

Kepak is committed to continually strengthening its approach. Our improvement priorities include:

- Increasing unannounced audits of labour providers
- Expanding worker engagement and feedback mechanisms
- Improving data analytics to identify potential exploitation indicators
- Reviewing policies annually to reflect legislative and industry developments

## Approval

**This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and is reviewed each year. It has been approved by the Board of Directors of Kepak Group Limited and will be reviewed and updated annually.**