



MODERN SLAVERY STATEMENT

2024/25

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ETHICAL FOOD COMPANY IS DEDICATED TO SUPPLYING ETHICAL FRESH PRODUCE YOU CAN TRUST.

Sourcing and growing from the UK and around the world, we have been at the forefront of supplying organic fresh produce for almost 40 years based on long-term, sustainable & mutually beneficial relationships. We are committed to making a difference, our plans maximise our positive social, ethical impacts and minimise our environmental footprint.

This annual Modern Slavery statement has been published in accordance with Section 54 of the UK Modern Slavery Act 2015. It covers the EFC financial year from October 1, 2024, to September 30, 2025. We recognise our obligation to demonstrate transparency in our efforts to reduce risks related to modern slavery, human trafficking, and forced labour within our direct operations and broader supply chain. This document provides an update on the action plans implemented in EFC's direct operations and upstream supply chains during this period.

This is our fifth modern slavery statement and as per previous years, we continue to make strides towards a holistic and mature approach to assessing, identifying and mitigating modern slavery risks, educating and empowering our team as well as our global supply base.

Global supply chain volatility poses challenges and vulnerabilities for our business. We acknowledge our

strengths and have worked to enhance resilience against climate and geopolitical instability, recognising the ongoing risks to individuals in our supply chain in the future.

EFC has been dedicated to promoting and implementing ethical and human rights due diligence, enhancing transparency and fostering awareness through engagement and collaboration across the global supply chains and industry partners.

In 2025/2026, we will continue to implement our de-risking action plans, focusing on salient risks in key sourcing countries. We will review the ethical maturity of our Tier 1 sites with a revised assessment in line with industry standards including updates on their implementation of policies to manage and remediate any modern slavery cases within their operations. Additionally, we aim to become members and be on the governance committee of the Modern Slavery International Network.

This statement has been approved by the Ethical Food Company Board of Directors.



Hazel Hunt, CEO, January 2026

ACTIONS

Over the last 12 months we have:



1

Updated our ethical trade and Human Rights strategic priorities in line with current most salient risks.

2

Reviewed and updated our Integrated Human rights risk assessment tool in line with current and emerging risks with regards to modern slavery and climate change impacts.

3

Adopted a salient risk approach and conducted Modern Slavery 121 sessions online, and at source in Argentina, Spain, the Netherlands, United Kingdom and Egypt.

4

Hosted our annual online webinar focussing this year on Heat Stress Risk to Workers and including an update on Modern Slavery to our global supply base.

5

Furthered collaboration by becoming sponsor of ESET (Egyptian Suppliers Ethical Trade Forum).

6

Continued to measure progress, impacts and effectiveness against our new KPIs.

7

Continued quarterly modern slavery governance meetings and industry collective action engagement.

8

Delivered Modern Slavery Training (initial or annual refresher) to all direct employees.



OUR BUSINESS AND SUPPLY CHAINS

EFC are importers and suppliers of organic fruit and organic ambient salads to major UK retailers, wholesalers and processing customers.

As a team of 35 experts, we manage a global supply chain to deliver year-round availability of a range of Organic products, including Top Fruit, Citrus, Grapes, Avocado, Berries, Salads, Stone Fruit, Green Beans, Exotic fruit and Chestnuts.

SOURCING COUNTRIES

We have developed a resilience strategy to close supply gaps and create sustainable availability in our supply chain. We source from the UK where seasonality and growing conditions allow, in particular, Organic apples, Organic berries and Organic salad crops.

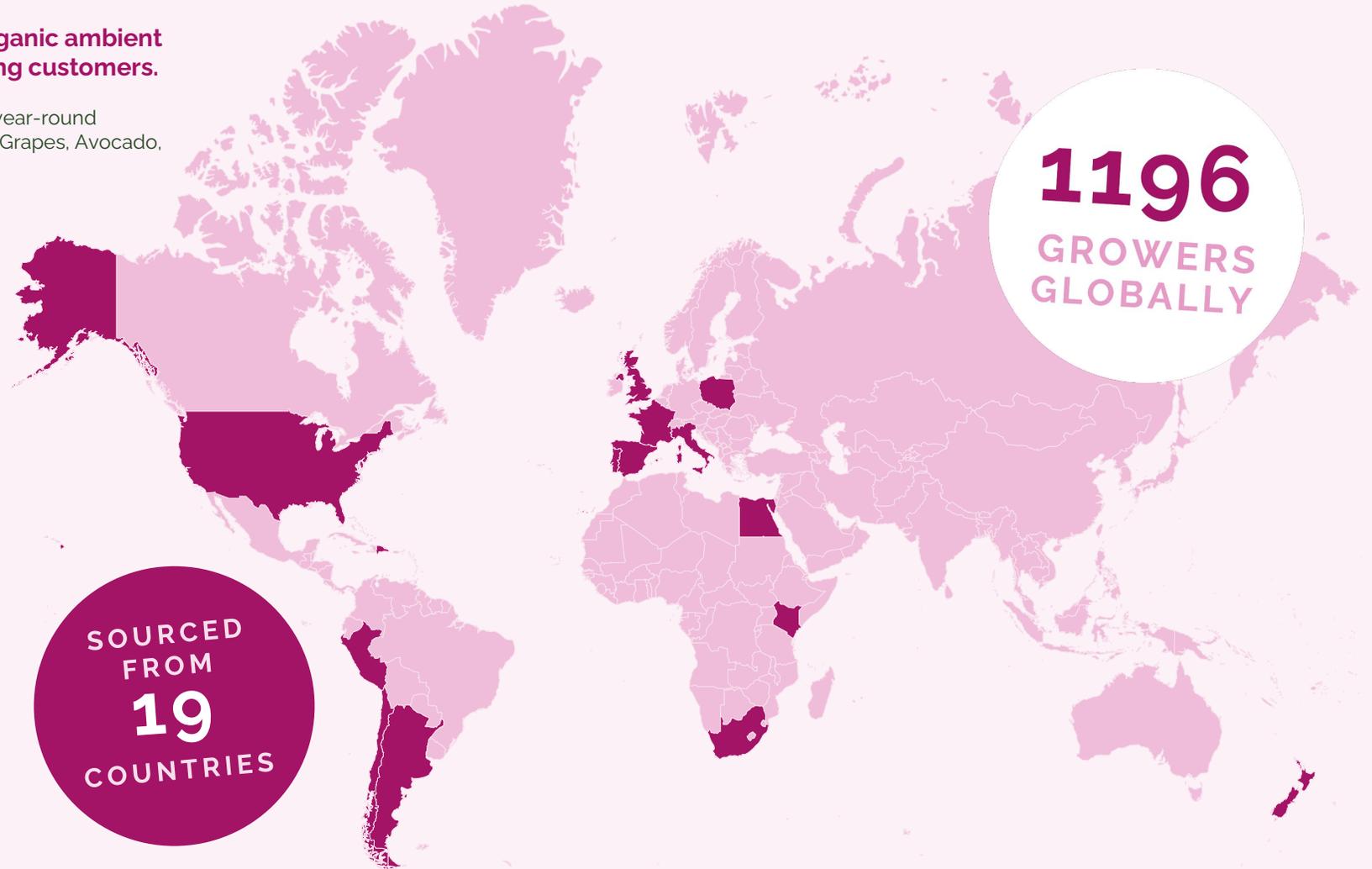
In the last financial year, we have sourced from 19 countries across Europe, the Americas, Africa and Oceania. Our 10 top sourcing countries by volume were Italy, Spain, Argentina, Chile, South Africa, United Kingdom, New Zealand, France, the Netherlands, Peru and the United States.

8 of our sourcing countries are classified as high risk, these were Argentina, Chile, South Africa, Peru, Kenya, Dominican Republic, Egypt and Morocco.

SUPPLIERS

We have worked with 67 producer marketing organisations and 1196 growers globally. The product was handled across 88 bulk packing facilities and 12 primary packing sites.

Out of the above, 34 packing facilities and 174 growers were based in our high-risk countries, with the total volume of our product sourced from high risk countries being 29% by weight, an increase of 6% from the previous year.



GOVERNANCE AND POLICIES

EFC policies are underpinned by alignment to and compliance with internationally recognised human rights standards:

the UN Universal Declaration of Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, the International Labour Organization Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the ETI Base Code and the UN Global Compact.

EFC reviews its policies annually in order to ensure they are fit for purpose against an ever evolving backdrop of Human Rights risk, and are based on current best practice and legal requirements while considering emerging risks through horizon scanning.

Our policies linked to our action against modern slavery risks:

EFC GENERAL TECHNICAL TERMS AND CONDITIONS

This policy, agreed to and signed by all suppliers outlines the terms of supply for food safety, authenticity and social responsibility. It requires that suppliers must adopt practices that enhance social responsibility and comply with EFC's Ethical Trade Policy.

SERIOUS INCIDENT AND ALLEGATION MANAGEMENT POLICY AND PROCEDURE

This policy outlines actions to be taken by EFC in the event of any allegation or incident that may constitute a breach of human rights to ensure adequate remedy.

EFC ETHICAL TRADE POLICY

This policy outlines EFC's commitment to ethical trade in own operations and across the supply chain aligned with the internationally recognised human rights standards.

The policy details the requirement of all sites within the EFC supply chains with regards to:

- Modern Slavery risks
- Third party ethical audits
- Implementation of effective grievance mechanisms
- Use of responsible recruitment and labour provision
- Engagement with industry / regional collaborative projects

RESPONSIBLE RECRUITMENT POLICY

Our recruitment policy that requires and reinforces our commitment to the principles of equality and diversity at all stages of recruitment and selection (and that all candidates have right to work in the UK).

ANTI-HARASSMENT AND BULLYING POLICY

This policy underlines our commitment to providing a safe and enjoyable working environment within EFCs own operations free from any form of harassment and bullying. It also outlines the process for any colleague to raise a complaint.



GOVERNANCE AND POLICIES

GRIEVANCE POLICY

Ethical Food Company recognises that staff may from time to time have a grievance or complaint relating to various issues which could include their work, working conditions, pay or benefits, working hours, treatment at the hands of fellow workers, or a breach of employment rights.

The company's grievance procedure aims to resolve any issues and provides a clear framework within which matters and any worker concerns are addressed.

WHISTLE BLOWING POLICY

Ethical Food Company is committed to the highest standards of openness, probity, and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the company to voice concerns in a responsible and effective manner.

This policy is designed to enable employees of Ethical Food Company to raise concerns internally and at a high level, to disclose information, which the individual believes shows malpractice or impropriety.

ETHICAL FOOD COMPANY OPERATING ETHICALLY PLAN

This plan outlines our commitments under our 3 pillars of Product, Planet and People. It details our strategic priorities and programs to maximise the positive impacts of our own operations and supply chains under those 3 pillars.

Our action against modern slavery risks is a fundamental part of our People pillar, including Human Rights & Environmental Due Diligence, Capacity Building and Collective Action; and Advocacy for Inclusion.

It outlines our key countries in our salient risk approach, and our ethical priorities based on most salient risks.

SENIOR TEAM COMMITMENT AND GOVERNANCE

The EFC Senior Leadership Team is accountable for the company's ethical trade, human rights and modern slavery approach.

The CEO and Head of Technical and Ethical Sourcing define the strategic direction and are accountable for ethical, human rights and modern slavery compliance, the implementation of mandatory requirements and identifying strategic priority areas for development.

The Ethical Lead is responsible for ethical compliance and strategic delivery. The Ethical Lead manages and is responsible for due diligence, the risk assessment process, KPIs, our ethical expectations of suppliers, investigating serious issues and highlighting to our business when and where these are not being met. The Ethical Lead engages in and leads collaborative projects within our global supply chains to aid the adoption of best practice further and build capacity.

Ethical compliance is reviewed weekly, and EFC supports suppliers to rectify issues and identify improvement plans as required. Any systemic performance issues are discussed and escalated in EFC board meetings, supplier reviews and in company-wide periodic ethical, human rights and modern slavery meetings.

All EFC staff are accountable for the upholding of our Ethical requirements and values of the company in their day-to-day operations. All EFC staff are trained in being able to identify any signs of modern slavery and the correct reporting channels to use where indicators are present.



DUE DILIGENCE

EFC General Technical Terms and Conditions and EFC Ethical Trade Policy

All suppliers are issued with and agree to key EFC policies annually.

Operating Ethically Policy and Strategy

Shared with strategic suppliers and customers to drive engagement and alignment throughout the supply chain.

Sedex Registration and SAQ

Completion by all supplying sites in our first and second tiers and 92% of tier three sites. Monitored by EFC due diligence team to track performance and identify and close any gaps.

Effective Grievance Mechanisms

A critical step in identifying modern slavery in the supply chain. EFC approved suppliers are required to ensure effective grievance mechanisms are in place and sites with more than 50 workers are recommended to have a freely elected worker committee or trade union.

Full Risk Assessment

All sites in our supply chains are risk assessed through the bespoke EFC Ethical Trade and Human Rights (ETHR) Risk Assessment tool to identify overall risk level and salient risks.

Site Auditing

High risk suppliers are third-party audited including SMETA, SIZA, Rainforest Alliance, Fairtrade, and GRASP. Going beyond third party audits, EFC have created a bespoke programme of second-party assessments completed by a team of internal auditors trained in Social System auditing.

De-risking Action Plans

The assessments enable the business to better identify the risk of labour exploitation where risk has been deemed the greatest and implement action plans to reduce those risks.

As part of the due diligence process, EFC actively encourages suppliers to be collaboratively engaged with leading industry programs (in country wherever available) and make use of the tools and resources available such as:



ASSESSING & MANAGING RISKS - SUPPLY CHAIN

The EFC Ethical Trade and Human Rights (ETHR) Risk Assessment was developed in 2020 in consultation with the Food Network for Ethical Trade (FNET) to improve our due diligence approach and extend our strategy beyond reliance on third party audits alone.

Since its inception, the risk assessment has evolved further to enabled increased risk visibility.

Through our participation in and enhanced understanding from collective action groups, we identified the need to increase the scope of our climate risk indicators within our human rights risk assessment.

To our existing data extracted from the World Wildlife Fund (WWF) regarding water and biodiversity we have added WASH (Water, Sanitation and Hygiene) risk indicators. With this additional data we are able to identify the potential long-term impacts that climate change has on human rights within broader communities and can capture the rights of and risks to further stakeholders. We can also best identify emerging risks of forced labour and modern slavery directly related to displacement driven migration due to a lack of key resources within the communities in which our supply base is operating.

We believe our approach is more sensitive to identifying the most salient areas of risk and vulnerabilities; during the current reporting year, we risk-assessed 100% of our suppliers and sites leading to the development of hot-spot and de-risking action plans in Chile, Argentina, France, UK, Spain and Italy.

We have identified our salient risks based on our integrated risk assessment, collaboration with other stakeholders in the fresh produce and food industry and the risks identified through third-party audits.

Relevant to modern slavery, our risk assessment criteria includes:

**FNET COUNTRY
RISK RATING**

**SEDEX COUNTRY AND
SECTOR RISK RATING**

**SEDEX SAQ
RISK RATING**

**GLOBAL SLAVERY INDEX
RISK RATING**

Prevalence, vulnerability and Govt response

**FNET KNOWN HUMAN
RIGHTS RISKS**

Human Rights, Child Labour
and Forced Labour

**CLIMATE CHANGE IMPACTS
ON HUMAN RIGHTS RISKS**

Water Quality & Availability, Water, Sanitation
& Hygiene (WASH), Biodiversity and Climate
Change Performance Index (CCPI)

**VULNERABLE
WORKER RISKS**

Female Workers, Migrant Workers, Young Workers
(15-17 yrs), Temporary Workers, Agency Labour and
Workers in employer accommodation

RAISING AWARENESS & BUILDING CAPACITY IN OUR BUSINESS

During the current reporting year, we have continued our training and capacity building within our internal teams through modern slavery training, induction training and participation in FNET forums and MSIN meetings.

We continue to ensure that 100% of new EFC staff complete our interactive modern slavery induction training within the first 4 weeks of joining the company and that existing staff receive the training on an annual basis.

Aligned to the UK's anti-slavery day in October 2024 we reinforced awareness by refreshing colleagues with our Modern Slavery Training content and sharing best practice for Modern Slavery Champions as issued by Stronger Together.

In addition this year we took the message to our Spanish supply chains and conducted modern slavery awareness and training sessions at source during Anti-Slavery Week.

OUR INTERACTIVE TRAINING SESSION COVERED:



RAISING AWARENESS & BUILDING CAPACITY IN OUR SUPPLY CHAINS

As a fundamental aspect of our strategy to increase multi-stakeholder engagement and governance, we launched an annual online supplier workshop for our global supply chains.

To make these sessions as engaging and informative as possible we invite multiple stakeholders from within fresh produce supply chains to compliment the content provided by EFC.

In July 2023 we held the first of these workshops, focused on the management of modern slavery risks within human rights due diligence.

In July 2024 we focussed on the importance of effective Grievance Mechanisms and access to remedy as per the UN Guiding Principles.

This year in September 2025 we held our third annual workshop: "Assessing And Mitigating Excessive Heat Risks For Workers"



HEAT STRESS AND ETHICAL TRADE STRATEGY

Presented by EFC and highlighting current global trends and how climate change impacts are increasing modern slavery risks globally.

IMPORTANCE OF TARGETED WORK ON HEAT STRESS

A presentation from Sainsbury's on how work on Heat Stress fits within their Human Rights Strategy including their actions against modern slavery risks.

UPDATE ON OUR PROGRESS AGAINST MODERN SLAVERY RISKS

Presented by EFC and highlighting current global trends and how climate change impacts are increasing modern slavery risks globally.

PRACTICAL STEPS TO ASSESS AND MITIGATE RISKS TO WORKERS

A presentation from the Ethical Lead at EFC on how businesses (including small and medium business enterprises) can effectively assess the risks and put on controls to reduce those risks for workers.

HEAT STRESS IN AGRICULTURE

Presented by La Isla Network, a global research and advisory NGO Conducting independent data-driven research on Occupational Safety & Health.

The presentation summarised their work across the globe and demonstrated how excessive heat can negatively impact worker health and lead to further workforce displacement resulting in increased vulnerability to modern slavery and forced labour risks.



RAISING AWARENESS & BUILDING CAPACITY IN OUR SUPPLY CHAINS

To further raise awareness and build capacity within our supply chains, we have conducted our interactive training sessions on a 1-2-1 basis with key suppliers across our global supply chains.

Through these sessions we are increasing awareness and aiding suppliers in identifying signs and risks of modern slavery, and helping them to increase their controls against the risks.

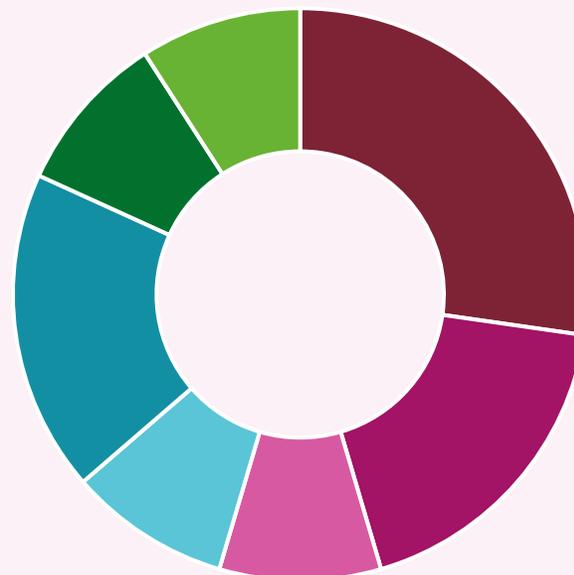
In 2024-2025 we have visited and conducted 11 1-2-1 Modern Slavery Sessions for suppliers in Argentina, Netherlands, Egypt, United Kingdom and Spain. These were held at PMO level, packhouse level and on growing sites.

While our ongoing internal training is proving invaluable in raising awareness for our own colleagues, the modern slavery sessions that we have conducted overseas has highlighted that within other countries the baseline understanding without additional intervention can be lacking.

There can be a misunderstanding when using the term "slavery" therefore the sessions are fundamental in explaining the true and evolving nature of modern slavery and the risks and actors involved in exploitation.

Furthermore we are increasing our roll-out of the supplier modern slavery 1-2-1 sessions within our existing supply base, and will include a session in the onboarding process for all new suppliers.

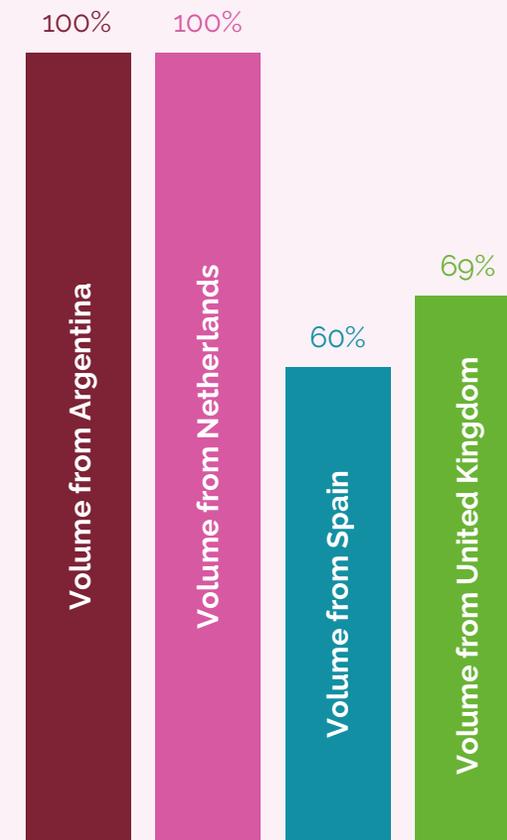
2024-2025 MODERN SLAVERY 1-2-1 HIGHLIGHTS



11 bespoke supply chain sessions in total:

- 3 Organic Topfruit & Kiwifruit - Argentina
- 2 Organic Pear - Netherlands
- 1 Organic Grape - Egypt
- 1 Organic Citrus - Spain
- 2 Organic Berry - Spain
- 1 Organic Apple - United Kingdom
- 1 Organic Berry - United Kingdom

The supply chains represent 26% total annual volume



RAISING AWARENESS & BUILDING CAPACITY IN OUR SUPPLY CHAINS

EFC is an active member of FNET and is represented within many working groups focussing on climate change impacts on human rights, due diligence tools for ethical trade, and best practice for empowering workers.

We have also become members of MSIN (the Modern Slavery Intelligence Network) to ensure that we continue to align with industry best practice and stay informed of all current intelligence on potential modern slavery risks and activities.

During this reporting period we have become sponsors of the Egyptian Suppliers Ethical Trade Forum due to an elevated risk of modern slavery within an informal labour supply.

Based on the identified salient risk areas, as part of the risk management approach, we continue to participate in collective action and collaborative projects.

For our UK supply chains we actively encourage collaboration with Stronger Together and that suppliers use the tools and resources available from them.

We require that the Modern Slavery Helpline is communicated to all workers on those sites and that the Just Good Work app is promoted to all workers.

COLLABORATIVE PROJECTS

FOOD NETWORK FOR ETHICAL TRADE (FNET)

- Common Due Diligence Tools
- Empowering Work
- Climate Change Impacts on Human Rights

ETHICAL TRADE INITIATIVE (ETI)

- Grievance Mechanisms in Agriculture (Italy & Spain)
- Responsible Purchasing Practices

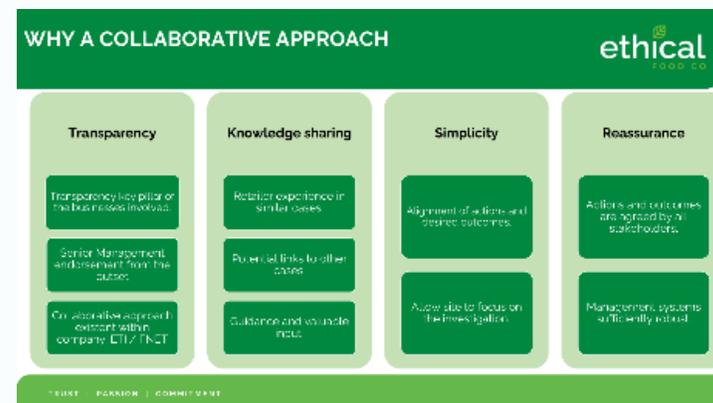
EGYPTIAN SUPPLIERS ETHICAL TRADE

- Forum Sponsors

Following a case of modern slavery identified in our business in 2023, we were invited to present a case study at the Co-operative Ethical Trade Strategic Supplier Forum in November 2024.

Our presentation focused on the survivor centred approach adopted to ensure the safety of survivor, and the benefits of having a robust training program on site to ensure all staff can quickly identify the signs of modern slavery and rapidly escalate concerns through the business.

However, it also identified challenges in providing remediation once contact is lost with the survivor, and learnings on ways to maintain contact so that full remediation can be made as per the survivor's wishes



MEASURING OUR POSITIVE SOCIAL & ETHICAL IMPACTS

	 <p>2024-25 KPIs</p>	 <p>PROGRESS MADE AND IMPACT</p>
<p>Ethical Trade, Human Rights & Modern Slavery due diligence</p>	<ul style="list-style-type: none"> Review and increase visibility in medium-risk countries working towards 100% in high-risk countries Report on audit NCs that may indicate increased risk concerning modern slavery risks Build an understanding of grievance mechanisms' effectiveness, strengthen worker's ability to report issues and improve risk identification 	<ul style="list-style-type: none"> 99% high-risk suppliers audited (207 out of 209 sites) 97% medium-risk suppliers audited (1056 out of 1088) A reduction in NCs that may indicate modern slavery risks to 31 (14%) from 43 (18%) in 2023-2024 A reduction in those NC graded as critical to 2 (6%) from 10 (23%) in 2023-2024 97 % documented grievance processes assessed by audit programs EFC supplier webinar on Effective Management of Excessive Heat in global agriculture, 43% of suppliers (75% of volume)
<p>Assessing & managing Modern Slavery risks – Our Business</p>	<ul style="list-style-type: none"> % improvement on the Stronger Together Implementation Checklist Implement top 3 PRT action plans to improve score next year Implementation of remediation policies and response procedures 	<ul style="list-style-type: none"> 93% on the Stronger Together Implementation Checklist (an increase from 86% the previous year) Maintained Stronger Together Advanced Business Partner Status 54% PRT (increase from 40% the previous year, improvement driven by the new policy, risk assessment improvement, training and governance) Implemented the Serious Incident and Allegation Policy and Procedure, which includes our remediation approach Reviewed EFC Ethical Maturity Framework in line with Industry guidance. Intermediate score
<p>Assessing & managing Modern Slavery risks – Our Supply Chain</p>	<ul style="list-style-type: none"> Use risk mapping data to identify country and product-specific modern slavery risks and develop targeted hot-spot reduction plans 	<ul style="list-style-type: none"> Further development of integrated Human Rights, Modern Slavery & Climate Change risk assessment in line with new WASH risks 100% (1196 growers and 100 packing sites) risk assessed 7 countries with targeted actions: United Kingdom, Peru, Italy, Spain, Chile, France and Argentina
<p>Raising Modern Slavery awareness & building capacity</p>	<ul style="list-style-type: none"> EFC Business Supply chain: Suppliers engaged through attendance to Modern Slavery training/events during the reporting year 	<ul style="list-style-type: none"> 100% of existing employees completed refresher training by the end of the reporting year Engagement with SWS: 100% of UK suppliers Spanish Ethical Forum 8 Suppliers attended events in 2023-2024 43% of suppliers engaged through EFC supplier workshop (75% of supply by volume) 11 supplier-specific Modern Slavery 121 (26% of supply by volume)

PRIORITIES

ASSESSING & MANAGING MODERN SLAVERY RISKS – OUR BUSINESS

Conduct Stronger Together Operational Progress Assessment (third party assessment to verify our progress on assessing and managing risks and highlight where we can further improve)

Re-assess and continue improvements against industry standard HRDD Maturity Framework

ASSESSING & MANAGING MODERN SLAVERY RISKS – OUR SUPPLY CHAIN

Review the site level serious incident response policies and procedures within our Tier 1 suppliers and further promote best practices and strengthened grievance mechanism processes to be cascaded through their supply chains.

Review our human rights due diligence maturity framework in line with new industry standard with key Tier 1 suppliers to strive for continual improvement within our supply chains.

Continue to gain insights from risk assessment to identify the most salient modern slavery risks within our supply chain that intersect with climate change related risks to develop longer term mitigation strategies, including increased engagement and site specific plans, starting with the country of focus: United Kingdom, Peru, Egypt, Italy, Spain, Chile, and Argentina.



ETHICAL TRADE, HUMAN RIGHTS & MODERN SLAVERY DUE DILIGENCE

Continue our periodic MS KPIs reporting.

Report on the number of modern slavery allegations and confirmed cases within own operations and the supply chain.

RAISING MODERN SLAVERY AWARENESS & BUILDING CAPACITY

Continue to host webinars, encourage participation in collaborative action groups and training to build capability and capacity to manage risk within own operation and supply chain

Continue supplier engagement by hosting a fourth year supplier conference and encourage engagement in the Spanish Ethical Trade Forum, Stronger Together (UK, RSA, US), Seasonal Workers Scheme (UK), Egyptian Suppliers Ethical Trade Forum

Supplier 121: continue with suppliers at higher risk of modern slavery as identified by our Risk Assessment and Horizon Scanning and introduce 1-2-1s with all new suppliers as part of the onboarding process.

Continue to deliver internal engagement Modern Slavery Awareness activities in October 2026

Continue to increase stakeholder engagement and multi-agency collaboration: maintain membership and engagement with the UK Modern Slavery Intelligence Network and grow our role as a trusted partner.

Continue our periodic company modern slavery meetings and working group, chaired by Ethical Lead

