

At Natures Way Foods, we recognise that modern slavery remains a serious and complex global issue. As a responsible business, we are committed to raising awareness, identifying risks, and working collaboratively to prevent exploitation in any form across our operations and supply chain.

We understand that modern slavery can often be hidden, and tackling it requires continuous vigilance, transparency, and collaboration. Over the past year, we have made progress in strengthening our policies, increasing awareness among our colleagues, and engaging with our suppliers to uphold high ethical standards. However, we know there is always more to do.

We are committed to continuously improving our approach - ensuring our colleagues are equipped to recognise and report concerns, strengthening due diligence within our supply chain, and working alongside industry partners to drive meaningful change.

At Natures Way Foods, we believe that doing the right thing is fundamental to who we are. This statement outlines our ongoing journey, the steps we have taken so far, and our commitment to further action in the year ahead.

A handwritten signature in black ink, appearing to read "Colin Smith".

Colin Smith
Chief Executive Officer



Organisational Structure

Natures Way Foods (NWF) is a leading manufacturer of fresh convenient food, that employs over 1200 people. We supply prepared salads, coleslaw, potato salad and fresh food-to-go products to some of the UK's largest supermarket and food service companies. NWF operates over 4 manufacturing sites in the UK and sources raw materials and ingredients from a world-wide supply base spanning 20+ countries.

NWF is committed to preventing modern slavery in its internal operations and supply chains.

In line with the Modern Slavery Act, 2015, we uphold strict standards across all activities, ensuring

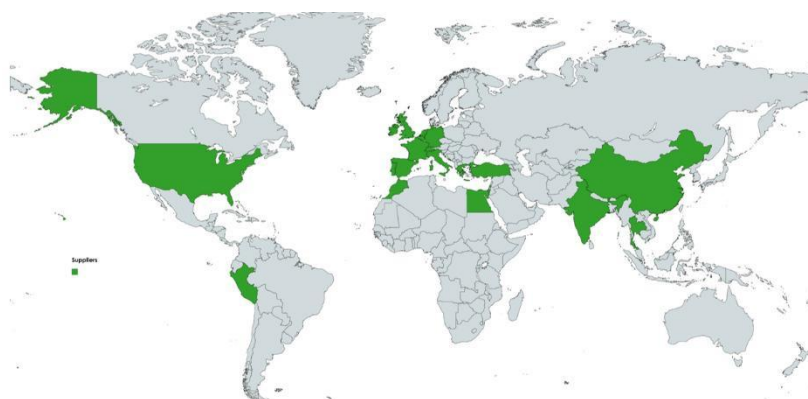


transparency and accountability in tackling forced labour and human trafficking. As an active supporter of **Stronger Together**, the **Ethical Trading Initiative (ETI) base code**, and **SEDEX (Supplier Ethical Data Exchange)**, we integrate these values into our operations and also require our suppliers to adhere to these standards.

NWF conducts risk assessments and audits based on **SEDEX** data, with high-risk suppliers undergoing more frequent checks. Recruitment practices are carefully monitored, using only **Gangmasters Licensing Abuse Authority (GLAA)** certified agencies, and colleagues are informed of their rights. Confidential whistleblowing helpful supports transparency, while NWF ensure all colleagues receive modern slavery training. In cases of violations, NWF conducts through investigations and implements remedial actions, reviewing policies as necessary to maintain ethical standards.

Supply Chain Compliance

NWF is committed to ensuring our supply chains adhere to the highest standards of ethics and abide by the supplier code of conduct. We will not supply ingredients from suppliers who exploit labour or employ children. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat colleagues with dignity and respect, and act ethically within the law in their use of labour. NWF has an expectation that suppliers will have systems in place to effectively monitor working hours, overtime and the number of seasonal colleagues returning or number of people leaving the company each year.



Suppliers are required to comply with the following:

1. Full **SEDEX** membership which commits companies to managing their supply chains responsibly
2. 100% complete Self-Assessment Questionnaire
3. Comply with the requirements of NWF Ethical Policy and Code of Conduct
4. Have in place a complete and signed Support Code of Practice or Fresh Produce Specification.
5. Suppliers' own ethical policy is communicated to both their supply base and all colleagues within their organisation.
6. Fully comply with and implement ethical legislation which meets the requirements of **The Modern slavery Act 2015 & Gangmasters Licensing Act** in the UK or their Country-of-Origin legislation and requirements.

Sanctions will be imposed for any supplier that fails to improve performance in line with an action plan or seriously violates the supplier code of conduct. This can lead to termination of the business relationship.

Supplier Risk Assessment and Audit

All suppliers are managed through NWF Risk Assessment which is calculated using suppliers **SEDEX** self-assessment questionnaire. Our risk assessments categorize suppliers and operations by risk level; with high-risk suppliers undergoing more frequent audits.

Suppliers are also assessed based on their product or geographical location. Where these assessments highlight a significant risk or breach of our requirements, an ethical audit will be required at the suppliers' or growers' site.

These audits are conducted by either a representative of NWF or an appointed third party. The NWF audit team have completed a Campden BRI course and renew their 'Field to Fork' training every 3 years. Third party audits are conducted by either **Global GAP** (annually) or **SMETA** (3 yearly). Failure to comply with these requirements or principles of our ethical policies will result in the supplier being removed from the NWF approved supplier list and therefore no longer able to supply any materials to the company.

Recruitment

NWF has a zero-tolerance policy for child labour. We do not directly recruit individuals under legal working age, nor do we engage with labour agencies that exploit or employ child labour. NWF will not knowingly use any individual or organisations to source and supply labour using practices of forced labour or modern slavery.

NWF uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers. All employment agencies must be a member of the **GLAA** and have procedures in place to manage potential modern slavery incidences.

Regular audits are conducted on a random selection of agency workers, each existing agency, and all new agencies supplying NWF. We ensure all colleagues fully understand their rights through contracts in their native languages.

The People Team at NWF conduct the following checks on a quarterly basis to identify any potential indicators or labour exploitation:

1. Colleagues' registered addresses are reviewed to detect any issues related to multiple occupancy dwellings, with checks made against property size.
2. Bank account checks are carried out to ensure that no more than two colleagues are sharing a bank account.
3. Contact numbers are verified to confirm that no more than two colleagues are sharing a phone number.

NWF will report any evidence or suspicious of such cases to the GLAA immediately. They will ensure that the recruitment team are aware of issues around modern slavery and can identify potential breaches through behaviour of applicants.

Whistleblowing

NWF encourages all colleagues to report any concerns that raise suspicious related to human trafficking or modern slavery both inside our organisation and throughout the supply chain. NWF's whistleblowing procedure is designed to make it easy for colleagues to make disclosure without fear of retaliation. The identity of the individual making the allegation will be kept confidential so long as it does not hinder any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence.

Colleagues who have concerns can use our confidential helpline, **SeeHearSpeakUp**, which is a free service operating 24/7, 265 days a year (0800 056 2539). This service is run externally and asks colleagues questions about their concerns including whether one of NWF customers is involved. Colleagues can converse in their native languages and **SeeHearSpeakUp** will provide NWF with translated information. Conversations are not recorded, and concerns can be raised anonymously.

Posters containing modern slavery advice and helplines information's are displayed throughout the workplace in multiple languages.

Remediation

In the event of modern slavery incident or allegation arising, investigations from NWF must immediately begin following by a response and review.

Investigation –

1. All relevant parties will be notified including Director, Senior Managers or the People Team who will appoint an independent Investigation Officer.
2. A formal investigation will be conducted through interviews with key people. This process aims to gather crucial information about the scope of the issue, such as the number of colleagues potentially affected and the involvement of other stakeholders, such as suppliers or recruitment agencies. The investigation will be handled with discretion to avoid alarming colleagues and causing further harm to individuals involved.
3. If appropriate, the case will be shared with the Modern Slavery Intelligence Network and passed to the National Referral Mechanism with consent from the victim.
4. If there is evidence of criminal activity the Investigating Officer should inform the police.

Response to the harmed colleague (depending on incident) may include-

1. Medical support, counselling or temporary accommodation
2. Help to access legal support and engage with other worker or trade unions if appropriate.

3. If fees were withheld, or any payment was made to a recruitment agency or human trafficker such as recruitment costs, bonds for uniforms, transport and accommodation costs, visa payments then the victim will be remunerated.
4. Ask the victim whether they feel satisfied with the remedy provided.
5. If the incident involves child labour, remove the child from the work and any hazards and where appropriate, aid their return to full-time education.

Review –

1. All contracts, codes of conduct, supplier terms and training tools to address any gaps. This may include amending policies.
2. Review whistleblowing channels to assess whether they are effective.
3. Incidences will be anonymously shared with relevant stakeholders and the MSIN network.

If any incident involves third parties who are uncooperative in resolving the issues or withhold critical information, NWF will issue a formal warning for breaking the supplier contract. Continued non-compliance may result in the termination of their contract with NWF.

Additionally, any failure by managers, company leaders, third-party labour providers, or organizations within the labour supply chain to address concerns of mistreatment, coercion or harassment will be treated as gross misconduct or a breach of contract. Such violations will be managed through the appropriate disciplinary or contractual termination processes.

Training and Awareness

As part of their induction, all colleagues receive training developed by NWF using **Stronger Together** resources. The training covers recognizing the signs of modern slavery, appropriate actions to take if an incident is suspected, and details of the reporting and information channels available to them.

Training is available with subtitles to ensure understanding of the topic and several languages to help non-native English speakers. This training is completed annually to act as a reminder to all colleagues.

Individuals in the People Team who work closely on the ethical strategy of the business have attended additional higher level training courses focused on policies, processes and managing ethical strategies.

Communication channels provided by **Food Network for Ethical Trading (FNET)** include group calls which members of the People Team participate in. These calls feature experts who discuss managing human rights exploitation, provide advice and suggest improvements to due diligence practices. **FNET** also highlights modern slavery hotspots through weekly newsletters. Information from these sources is passed onto relevant departments or colleagues to ensure those involved are kept up to date with latest developments.

The **Modern Slavery Intelligence Network (MSIN)**, established by leading UK food and Agricultural companies serve as a centralized database for sharing details of modern slavery incidents within the industry. As an active member, NWF closely monitors the database to identify potential threats and take swift action where necessary. In addition to incident

reporting, **MSIN** provides geopolitical reports that highlight trafficking risks and routes associated with global conflicts, such as wars. It also offers webinars led by experts on topics such as identifying false documentation, serving as valuable training opportunities for HR teams and enhancing their ability to combat modern slavery effectively

All information provided by **MSIN** that may impact on our operations is shared with relevant internal or external parties so that information can be checked against our records. If any of this information is identified within our organization then details will be shared back with the **MSIN** network and appropriate action taken; which may include contacting **GLAA** if necessary.

Key Achievements in 2025

- Engaged with Stronger Together to achieve 2025 Business Partnership.
- Action plan developed from Stronger Together Implementation checklist with an improved score from 43% for 58%.
- Improved training offering for colleagues in our Technical Compliance team who are responsible for auditing third party suppliers
- Implemented modern slavery champions across the business who were able to spot potential signs of modern slavery in one case.

2026 Commitments

1. Continue to gain traction with our modern slavery champions, recruiting more champions and creating events for them to attend.
2. Improve NWF Stronger Together Progress Reporting score.
3. Commitment to gain 2026 Stronger Together business partnerships
4. Review our processes and practices across departments to close out any gaps highlighted during our self-assessment.





KPIs

The organization has and will continue to review its Key Performance Indicator (KPI) in conjunction with the **Modern Slavery Act 2015**.

As a result, NWF:

1. Training:
 - All colleagues must complete **Stronger Together** – Understanding & Tackling Modern slavery course annually
 - People Team, Supply Chain and compliance colleagues, as well as appropriate managers should complete further training course on 'Tackling Hidden Labour Exploitation' provided by **GLAA**.
2. Ethical visits involving audits are carried out on high-risk suppliers, growers and manufactures and key findings and corrective actions closed off effectively.
3. Promotion of the whistleblowing line and encourage colleagues to communicate any modern slavery concerns within operations or from a third-party to their managers.
4. Modern slavery champions meeting quarterly and sharing of information to address the risks of labour exploitation and modern slavery.
5. Improved score of 55% on Stronger Together modern slavery implementation checklist.

Collaboration

Partner	Purpose
	<p>SeeHearSpeakUp is an AAB Group Company which is an external service operating 24/7, 365 days a year. NWF uses this whistleblowing line for colleagues to raise concerns about modern slavery. The helpline is fully confidential 0800 056 2539</p>
	<p>NWF's policies are written in conjunction to the Ethical Trading Initiative and we expect suppliers to also abide by the base code.</p>
	<p>Being a member of the Food Network for Ethical Trade, ensures that we are alerted of modern slavery hotspots or incidences in other food production companies. This helps us intercept or prevent incidences in our own supply chains.</p>
	<p>The GLAA is a UK law and enforcement body to protect vulnerable workers from exploitation. NWF writes polices in conjunction with the GLAA and uses their resources as training tools.</p>



GlobalG.A.P is a certification standard for agricultural practices ensuring food safety, sustainability, and environmental responsibility. Suppliers of NWF are audited by GlobalG.A.P



MSIN is an intelligence data sharing platform for live updates of modern slavery incidences in the UK Food and Agricultural sector. NWF utilises this data and the reports and webinars that MSIN offers.



All suppliers must be a member of Supplier Ethical Data Exchange to ensure ethical transparency. NWF uses SEDEX tools to risk-assess suppliers. We use SMETA to audit operations and supplies.



Stronger Together provides businesses with training and resources to mitigate labour exploitation. In 2024, NWF became a Business partner, committing to full transparency to tackling modern slavery. We refer closely to Stronger Together resources especially during modern slavery training for all colleagues.



The Association of Labour providers (ALP) is a not-for-profit trade association promoting responsible recruitment and good practice for organisations that supply essential workers across primary and industrial sectors, construction, food and general manufacturing, warehousing, logistics and the supply chain.