



# Modern Slavery Statement 2025

Bakkavor

### Introduction from the Chief Executive Officer

At Bakkavor, we conduct our business with integrity, transparency, and respect for human rights. As a leader in fresh prepared foods, we are committed to ensuring that modern slavery and human trafficking have no place in our operations or supply chains.

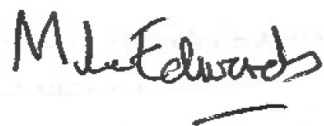
This commitment is central to our ESG strategy—Trusted Partner—and underpins our relationships with suppliers and stakeholders. Our 2024 Modern Slavery Report outlines the steps taken to identify, prevent, and mitigate risks across our full value chain, covering both directly employed and supply chain workers.

With a global supply base, we recognise the evolving risks of modern slavery. That is why we continually strengthen our policies, aligning them with emerging risks, regulatory updates, and industry best practices.

Human rights accountability remains a top priority. Our Responsible Sourcing Steering Team—comprising Procurement, Technical, and ESG specialists—oversees site-level monitoring, while ultimate oversight lies with the Group Board's ESG Committee.

We are also proud of our long-standing partnership with Stronger Together, whose expertise and independent review ensures our approach remains aligned with best-in-class standards.

Dedicated teams within Bakkavor continue to drive our modern slavery strategy and broader social initiatives, reinforcing our commitment to ethical and responsible business practices.



**Mike Edwards**

CEO, Bakkavor Group plc

This statement was approved by the Board of Bakkavor Group plc on 26 June 2025.



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1. INTRODUCTION

This statement is Bakkavor’s latest Modern Slavery Statement (the “Statement”) and relates to the year ending 28 December 2024. In scope it covers Bakkavor Group plc and relevant group subsidiaries (listed below) with a greater focus on our UK Operations due to our internal risk assessment. In addition, many of the tools and partnerships noted are not available or adapted to our international markets.

Bakkavor Group plc and its subsidiaries are referred to as “Bakkavor” or “the Group” throughout this Statement. In this Statement we set out the activities we have undertaken in 2024 to tackle the issue of modern slavery within our own business and in our supply chain.

2. OUR BUSINESS AND SUPPLY CHAINS

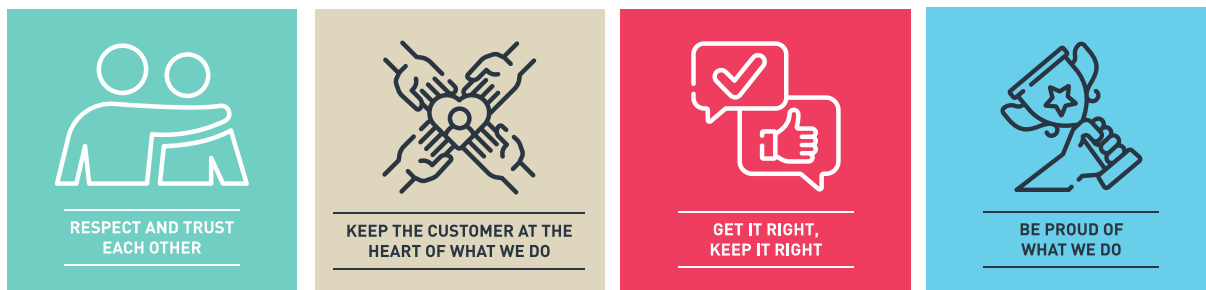
Bakkavor is a leading manufacturer of fresh prepared food. We operate from 40 sites across the UK, China and USA, developing and manufacturing c.3,100 fresh prepared food products. Our sites in the UK include 20 factories, a growing unit, four distribution centres, plus the Group head office in London. In the US there are four sites and a regional head office in North Carolina. In China we have seven factories, a farm and a regional head office in Shanghai. We employ around 17,200 people and the Group’s reported revenue in 2024 was £2.3 billion.

We source tens of thousands of raw materials from c.1,400 suppliers – from small farmers to multi-national operators. They, in turn, work with thousands of their own suppliers who grow and move hundreds of raw materials across global supply chains. Product safety and supply chain integrity are underpinned by robust systems, from risk assessment through to supply chain mapping.

1.1 Our Values

We are proud to be a values-led business. Our vision and purpose are underpinned by these values and are the foundation of our culture.

PROUD TO LIVE OUR VALUES



Our commitment to help end modern slavery reflects our values. In particular, we are committed to ensure that the operations in our supply chain should have a positive impact, creating opportunities for people all over the world.

## 1.2 Our Group ESG Strategy

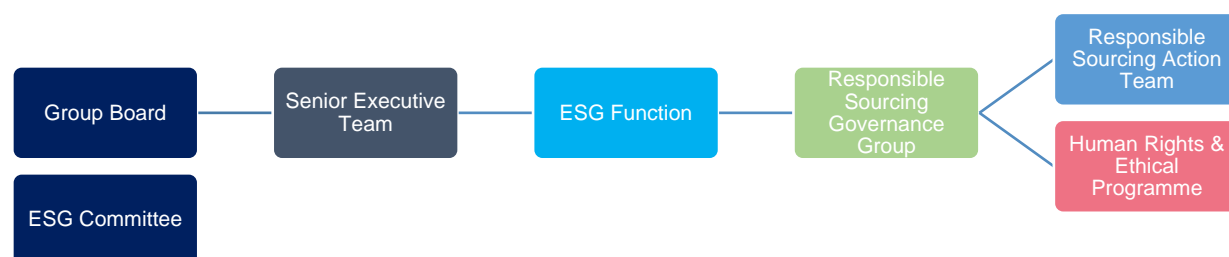
Trusted Partner is our ESG (Environment, Social and Governance) strategy that guides our progress towards a more sustainable business.

Bakkavor takes its responsibility to build a sustainable business seriously. Our Trusted Partner strategy is built around three focus areas:



1. **Responsible Sourcing** in our supply chain
2. **Sustainability and Innovation** in our operations
3. **Engagement and Wellbeing** in our workplaces and communities

Our ESG Governance structure includes ethical trade and human rights in our own operations and supply chain and reports into the Group ESG team:



Our third [ESG report](#) contains a detailed overview of our Trusted Partner strategy and the progress we have made against our ESG objectives and activities in 2024.

### 3. GOVERNANCE OF HUMAN RIGHTS

Responsibility for ethical trade and human rights is as set out below:

Group Board	
Overall responsibility for ethical trade and human rights including the signing of the Group Modern Slavery Statement	
CEO: Mike Edwards	
<b>Bakkavor Internal Operations</b>	<b>Bakkavor Supply Chain</b>
Responsibility within Bakkavor sites	Responsibility in the Bakkavor supply chain
Chief People Officer: Donna-Maria Lee	Chief Financial Officer: Lee Miley

#### 2.1 Internal Human Rights Team

Bakkavor's Human Rights and Ethical Programme is led by our internal human rights team, which includes a nominated Head of Human Resources, two Senior HR Business Partners, and an external ethical trade specialist.

The team's primary role is to ensure that our operations understand and comply with ethical human rights standards. This includes developing ethical policies and processes, delivering training and support, and shaping and overseeing Bakkavor's human rights and modern slavery action plans.

Two groups have oversight for implementation of Bakkavor's human rights strategy and ensure the business is informed of and able to respond to emerging risks:

- The Responsible Sourcing Governance Group sets the direction on strategy and policies.
- The Responsible Sourcing Steering Team implements the strategy and policies and ensures that progress is tracked and managed.



**Responsible Sourcing**  
Risk assessment - Own operations and supply chain





## 2.2 Relevant Policies

The following policies underpin our approach to tackling Modern Slavery in our own business and our supply chain:

- Ethical Trade and Human Rights Policy
- Internal Human Rights and Ethical Trading Policy
- Anti- Bribery and Business Ethics Policy
- Bakkavor Code of Conduct
- Inclusion and Diversity Policy
- Whistleblowing Policy
- Supplier Code of Conduct
- Anti-Money Laundering Policy
- Group Remediation Policy
- Forced Labour Response Plan Policy
- Resourcing and Recruitment Policy

## 2.3 Risk Assessments and Audits Within our Own Operations

Our approach to risk assessments and audits remains unchanged, and we constantly assess our own operations, including for potential risks.

## 4. HUMAN RIGHTS AND ETHICAL TRADE PROGRAMME

The Bakkavor Human Rights and Ethical Trade Programme brings together all the activities undertaken at Group and site level into a common framework:



The programme is reviewed annually and updated as needed. In 2024, the focus remained on embedding and operationalising our approach across the business.

### 3.1 Risk assessment and Audits Within our Own Operations

- **Internal Ethical Audit Process** – Designed to help our sites embed the Human Rights and Ethical Trade Programme. In 2024, four sites successfully completed this process.
- **SEDEX SAQ & RADAR Risk Rating** – All Bakkavor UK sites complete the SEDEX Self-Assessment Questionnaire (SAQ), which is updated annually. By the end of 2024, all UK sites had achieved a low-risk rating.
- **SEDEX AB member** – As an active Buyer/Supplier (AB) member of SEDEX, we play a leadership role by sharing feedback on our user experience and contributing to SEDEX's system development initiatives.
- **Third Party SMETA Audits** – Bakkavor sites undergo third-party SEDEX Members Ethical Trade Audits (SMETA) audits every four years or sooner if required by customers. Most customers do not require audits for low-risk suppliers. In 2024, no Bakkavor sites were required to complete a SMETA audit. We maintain a zero-tolerance approach to non-compliances, ensuring that any issues identified are resolved promptly.
- **SEDEX SMETA 7.0** – We actively participated in the consultation process for the new SMETA 7.0 audit methodology, which launched in September 2024. Preparations are now underway for our next SMETA audits in 2025.
- **Modern Slavery Risk Assessment Process** – This is our internal, Bakkavor-specific annual risk assessment, designed to provide each site with a modern slavery risk rating:

Our overall modern slavery risk rating has increased for the fourth consecutive year, reaching 71%. This reflects improved awareness and more accurate self-assessment across our sites. The majority of our sites have strengthened their management of modern slavery risks and are now rated as low risk. Three sites are currently assessed as medium risk, reflecting their specific circumstances. Each of these sites has a tailored action plan in place to improve their risk management practices.

Risk Rating	Assessment	Score Range
High Risk	Very likely to have issues of modern slavery	<33%
Medium Risk	Possible there are some issues of modern slavery	33% - 63%
Low Risk	Unlikely to have issues of modern slavery	>67%

- **Stronger Together Good Practice Implementation Checklist** – In addition to our modern slavery risk assessment process, all UK sites complete this [checklist](#) annually. It helps us assess how effectively we are implementing our Human Rights and Ethical Trade Programme. Bakkavor has partnered with [Stronger Together](#) since 2013 and continues to

actively support the development of training, guidance, and practical toolkits. As Stronger Together grows internationally, we are looking to expand our partnership to our US operations.

- **Stronger Together Progress Monitoring Tool** – this [online self-assessment](#) helps companies evaluate their progress and identify next steps in addressing modern slavery risks across operations and supply chains. It is completed at UK-wide level and serves as one of our key performance indicators. We are pleased to report that we have maintained our overall score of 79%.
- **Stronger Together Organisation Performance Assessment** – In 2024, Stronger Together conducted our third Organisation Performance Assessment. Our overall score increased again, to 79%.
- **Stronger Together Business Partner** – We continue to publicly share evidence of our commitment to tackling modern slavery through the Stronger Together Business Partner platform. In 2024, we maintained our *Business Partner Advanced* status - the only large business to hold this. 
- **Responsible Recruitment Business Partner** – As part of our focus on ethical recruitment practices, we upload evidence to the Stronger Together platform to demonstrate our commitment. In 2024, we were proud to achieve *Responsible Recruitment Business Partner Advanced* status for the second consecutive year. 
- **Speak Up Whistleblowing hotline** – Our *Speak Up* hotline provides all employees, including agency workers, with a confidential and anonymous channel to raise concerns, including those related to modern slavery. All cases reported in 2024 were thoroughly investigated by the site's HR teams and senior management. Information about the hotline is clearly displayed across all sites. Whistleblowing activity is also reviewed at each Group Board meeting.
- **Third Party Labour Provider Annual Audits** – Labour providers supplying more than ten workers are required to complete an annual audit, specifically designed by Bakkavor. The audit covers management systems, financial due diligence, compliance with Bakkavor's terms of business, recruitment fee risk, grievance procedures, and agency worker feedback. In 2024, we conducted the fourth round of these audits, with twelve labour providers completing the process.
- **Annual Review** – The fourth annual review of our Human Rights and Ethical Programme was completed in 2024. This review enables us to track progress, assess our effectiveness in addressing modern slavery risks, and update the programme as needed.

### 3.2 Modern Slavery Action Plan 2024

Using the results from the Modern Slavery Risk Assessment and Stronger Together Good Practice checklist and our Annual Review, we developed our fourth Modern Slavery Action Plan:



Actions	Status
<b>1. Continued Modern slavery awareness training</b> Run modern slavery awareness training sessions for SEF/TU Representatives, HR and Operations managers and extend to Central Recruitment Team and achieve training targets of 75% - 80%	✓
<b>2. Embed Remedy and Remediation Policies</b> Continued to embed Forced Labour Response Plan policy and update the Remediation policy	✓
<b>3. Achieve Responsible Recruitment Business Partner Advanced Status</b> Self-assess our direct recruitment process against the Responsible Recruitment Toolkit Standards and achieve Business Partner Advanced Status.	✓
<b>4. Onsite Contractors</b> Agree the onsite contractors to be covered by the modern slavery risk assessment process and work with Stronger Together to develop a checklist.	✓
<b>5. Agency Labour Third Party Audits</b> Complete fourth annual assessment process of all labour providers by an independent qualified labour provider auditor, aiming for all to be at least compliant	✓
<b>6. Improve Workplace Engagement on modern slavery.</b> Implement new ways to improve workforce engagement on modern slavery including a new video, new random checklist, and promotion of Anti-slavery Day	✓
<b>7. Third Stronger Together Organisational Performance Assessment</b> Complete the third-party audit process for the third time	✓

Five actions have been completed in full and good progress has been made on the remaining two. We have plans to complete these two in 2025.

## 5. ACTION ON MODERN SLAVERY – BAKKAVOR OWN OPERATIONS

A key focus for 2024 was to improve workplace engagement and awareness around modern slavery. As part of this, we launched a short awareness video for use across our sites. The video highlights common indicators of modern slavery and is designed to be shown in canteens and during brief training sessions, particularly for evening and night shift colleagues.

We also trialled a new modern slavery random checklist process at three sites, developed in partnership with [nGaje](#). As part of the trial, we introduced a modern slavery poll on the nGaje platform, enabling site-based colleagues to record conversations and check understanding of the indicators of modern slavery and how to report concerns. The pilot was successful and will be rolled out across all Bakkavor UK sites in 2025.

In October, we marked *Anti-Slavery Day* (18th October) for the first time. Sites organised awareness-raising activities and displayed posters and information to promote understanding of modern slavery.

We continued embedding *Response Plan Teams* at each site, a structure established in 2022. These team members are trained in recognising and responding to signs of modern slavery and forced labour, as well as how to report and document cases. We continue to use Stronger Together's *Modern Slavery Champion [resources](#)* to support these teams.

In 2024, we also strengthened our expectations for labour providers in tackling modern slavery. They are now required to:

- Have a policy aligned with ILO indicators of forced labour;
- Maintain documentation of any issues identified;
- Use our internal risk flag system;
- Conduct thorough investigations into incidents;
- Appoint a Modern Slavery Lead responsible for escalating concerns to Bakkavor site HR teams.

Additionally, we formalised our internal reporting process and continue to display Stronger Together posters across all sites to reinforce awareness.

Finally, we became a business partner of [Bright Future Co-op](#) to support survivors of modern slavery, who often face significant barriers in re-entering the workforce. In 2024, we were proud to offer work experience opportunities to several survivors, with one individual successfully securing safe and stable employment at Bakkavor.

During 2024, we identified several potential cases of modern slavery including:

- **London** – On 28 March, it was reported to Bakkavor that an agency had promised employment at Bakkavor to a person's friends, allegedly confirming that Bakkavor would support the visa applications. One individual had paid the agency £2,000 and received a fraudulent employment contract. Additionally, on 12 April, two women arrived at our Bakkavor Meals London – Cumberland site claiming to start work, despite no new hires being scheduled. One disclosed paying £500 to secure the job, and at least seven others had also paid the same agent. These cases were reported to the Gangmasters & Labour Abuse Authority (GLAA) and referred to Action Fraud; no further updates were received.
- **Tilmanstone** – We were alerted to an allegation that an agency worker was demanding money from people in their local community in exchange for work opportunities with a labour provider supplying the site. The labour provider investigated and reported the matter to the GLAA. It was concluded to be a scam or fraud rather than a case of modern slavery.

## 6. ACTION ON MODERN SLAVERY– BAKKAVOR SUPPLY CHAIN

Bakkavor maintains a high level of awareness regarding the risk of modern slavery within our supply chain. We recognise our responsibility to inform suppliers about these risks and to collaborate with them to prevent and eliminate all forms of exploitation across their operations and supply chains.

We understand that tackling modern slavery requires collective action. The greatest impact is achieved by working pre-competitively with customers, peers, suppliers, governments, enforcement agencies, and civil society. We remain committed to supporting the collaborations and institutions that enable this approach to be most effective.

In 2024, we introduced two key programmes to strengthen our human rights due diligence:

- **Third-Party Assessments:** Expert agencies conducted dedicated assessments of supplier human rights due diligence systems.
- **Global Sourcing Risk Review:** We systematically assessed our global sourcing footprint and developed guidance to help sites and suppliers reduce risks when sourcing from countries with elevated human rights and governance concerns.

## 5.1 Migrant Labour

Migrant labour remains one of the most complex challenges in the food industry. Seasonal demands in agriculture and manufacturing create a continual need for migrant workers, a workforce vulnerable to exploitation.

Suppliers must assess the risk of migrant labour within their operations and supply chains and implement measures proportionate to the severity and likelihood of potential harm.

Bakkavor expects suppliers to have clear visibility of all recruitment-related fees and costs, including those incurred at origin, during transit (where applicable), and any debts workers may carry.

Suppliers should have a migrant worker recruitment policy that clearly defines which fees and costs are borne by workers and which by employers, alongside guiding principles for engagement with registered recruitment agencies, sub-agents, and third-party recruiters.

Where not already in place, suppliers should develop a time-bound action plan to adopt responsible recruitment practices aligned with the Employer Pays Principle and the ILO's standards on recruitment fees and costs. These practices must be supported by adequate controls integrated into recruitment processes.

These requirements are detailed in the Bakkavor Supplier Code of Conduct. Suppliers are required to report on compliance, with ongoing engagement to address any non-compliance.

## 5.2 Supply Chain Collaboration

### 5.2.1 Food Network for Ethical Trade (FNET)

Bakkavor is a founding member of the Food Network for Ethical Trade (FNET), a collaborative platform aimed at promoting aligned approaches to ethical supply chain management within the food industry. FNET offers expertise, insights, and a safe space for members to address shared human rights challenges.

Since joining the FNET Board in 2022, Bakkavor has helped drive industry-wide action to eliminate modern slavery. The company actively participates in FNET working groups and chairs the Audit and Risk Committee, ensuring strong organisational governance.

In 2024, FNET published its Theory of Change, outlining its intended impact and guiding member organisations in prioritising efforts to achieve meaningful change within their supply chains.

### 5.2.2 Modern Slavery Intelligence Network (MSIN)

Bakkavor is a founding supporter of the Modern Slavery Intelligence Network (MSIN), a non-profit collaboration formed in response to Operation Fort, the UK's largest modern slavery investigation. Supported by the charity Stop the Traffic, MSIN provides a secure platform for sharing intelligence, expert analysis, and guidance on modern slavery prevention and remediation, enabling members to confidentially report incidents.

### 5.2.3 Spanish Ethical Trade Forum (ETF)

The Spanish Ethical Trade Forum (ETF) creates a non-competitive space for Spanish suppliers and their UK customers to share best practices on human rights and environmental issues, and to collaboratively address challenges.

Bakkavor remains an active participant, with Spanish technical colleagues and the UK Responsible Sourcing Team engaged in events and activities both online and in-person. In 2023, Bakkavor Technical Manager in Spain was appointed to the ETF Board, reflecting the company's strong commitment to the forum.

### 5.3.4 Ethical Trade Initiative Grievance Mechanisms in Agriculture

Bakkavor participates in a UK Government-funded project under the Modern Slavery Innovation Fund, supporting the UK Modern Slavery Strategy. The initiative aims to improve migrant workers' access to grievance mechanisms within agricultural supply chains in Spain and Italy, while helping retailers, suppliers, and producers enhance their efforts to prevent modern slavery and promote decent work.

In partnership with the Spanish ETF, the Ethical Trade Initiative (ETI) is developing a unified grievance mechanism for Spanish growers to maximise accessibility and effectiveness. This collaboration has provided valuable insights into migrant worker conditions in a key sourcing region for Bakkavor, ensuring the grievance system meets the needs of both suppliers and workers.

## 5.3 Direct Supplier Engagement

Building on insights from the 2023 relaunch of our Supplier Code of Conduct and the 2024 SAQ, Bakkavor engaged an expert third-party firm to evaluate the human rights management systems of key suppliers, representing 33% of our procurement spend. The feedback is currently being analysed to guide the development of the programme in 2025 and beyond.

## 7. MODERN SLAVERY TRAINING AND AWARENESS

### 6.1 Bakkavor Operational Capacity Building

In 2024 Bakkavor continued to deliver our on-line modular training programme to reach more colleagues across the group.

The following sessions took place:

Training Session	Numbers of Sessions
Modern Slavery Response Plan Team	2
Modern Slavery and Hidden Exploitation for SEF and Trade Union Reps	3
Modern Slavery and Hidden Exploitation for HR	2
Modern Slavery and Hidden Exploitation for Operations	4
Bakkavor Ethical Trade and Human Rights Programme for HR	2
Annual Modern Slavery Risk Assessment Process for HR	1
Responsible Recruitment Toolkit standards for recruiters (new)	2
Customers & Human Rights for HR, Commercial, Procurement and Technical	1

Our ethical compliance consultant accesses Stronger Together and other ethical standards resources to ensure we have the most up to date information on tackling the issue of modern slavery and hidden exploitation which are built into our training sessions.

## 6.2 Stronger Together: 'Tackling Modern Slavery in UK businesses' Training Course

As part of our ongoing commitment to capacity building, Bakkavor requires at least one HR colleague per site to complete Stronger Together's Tackling Modern Slavery in UK Businesses [training](#) every three years—ideally two, to allow for role changes and staff turnover.

In 2024, 15 HR colleagues completed the course, and one colleague attended the Advanced Tackling Modern Slavery in UK Businesses course. Additional HR colleagues will be trained in 2025 to ensure that each site continues to have a minimum of two trained individuals.

## 6.3 Effectiveness Assessment

We regularly evaluate the impact of our actions through key performance indicators (KPIs), which are reported in our annual Modern Slavery Statement. These KPIs help measure progress in raising awareness and building capability across the Group.

Key Performance Indicator	2017	2018	2019	2020	2021	2022	2023	2024
Stronger Together Progress Monitoring Tool		49%	55%	65%	77%	77%	79%	79%
Stronger Together Organisational Performance Assessment		43%			77%	77%	77%	79%
% of Bakkavor sites with HR that have completed the Stronger Together training	89%	100%	100%	89%	100%	100%	74% <sup>1</sup>	100%
% of Bakkavor sites completed the Modern Slavery Risk Assessment	100%	100%	100%	100%	100%	100%	100%	100%
% of Bakkavor sites completed the Stronger Together Tackling Modern	89%	100%	100%	100%	100%	100%	100%	100%

<sup>1</sup> In 2023, we reset the numbers that have attended this training to include only those that have been trained in the last three years.



Key Performance Indicator	2017	2018	2019	2020	2021	2022	2023	2024
Slavery in Business Implementation Checklist								
Number of Bakkavor Capacity Building Days	550	469	521	225	2205	715	607	211
% of Bakkavor sites that have completed an agency audit every 12 months	100%	100%	100%	100%	100%	100% <sup>1</sup>	100%	100%
Number of cases received by the Whistleblowing hotline	105	67	69	51	42	21	41	20
% of whistleblowing cases closed out	100%	100%	100%	100%	100%	90%	92%	95% <sup>2</sup>
Stronger Together Good Practice Implementation Checklist				54%	65%	72%	77%	77%
Modern Slavery Risk Rating					62%	63%	66%	71%

#### 6.4 Progress Against Stronger Together's 'Tackling Modern Slavery - Good Practice Implementation Checklist'

Using this checklist, we are able to monitor our year-on-year progress and measure our activities against the UN Guiding Principles Framework. Action plans will support further improvements in 2025

Steps	2020	2021	2022	2023	2024
1. COMMIT to tackle modern slavery risk in your business	65%	85%	86%	93%	92%
2. ASSESS - Understand the risks of modern slavery and hidden exploitation within your business	75%	82%	92%	93%	94%
3. ACT - Take action to prevent and deal with identified risks	49%	52%	58%	61%	62%
4. REMEDY - Protect and provide remedy for victims of exploitation	34%	64%	72%	72%	72%
5. MONITOR - Monitor and review progress	66%	81%	80%	80%	80%
6. COMMUNICATE - Tell people what you've done	71%	88%	88%	88%	88%
<b>OVERALL SCORE</b>	<b>54%</b>	<b>65%</b>	<b>72%</b>	<b>77%</b>	<b>77%</b>

<sup>1</sup> Change to every 12 months in 2022 with the new Labour Provider Audit Process

<sup>2</sup> One case was outstanding at the end of 2024, closed out in 2025