



INTRODUCTION

This Chaucer Foods Ltd Modern Slavery Statement provides details on our commitment to ensure that modern slavery and human trafficking are not occurring in our core operations and supply chains.

COMMITMENT

Chaucer Foods Group is committed to driving out acts of modern slavery from within the business and its supply chains. As a company, we understand that we are responsible for the enforcement of the Modern Slavery Act 2015 and we will ensure that all Chaucer Foods Organisations, suppliers, and services of the business comply.

This statement covers the following entities:

Broomco (3554) Limited
Broomco (3555) Limited
Pilgrim Food Holdings
Chaucer Foods Limited
Chaucer Foods UK Limited

And all other sub entities under these holding companies.

The Chaucer Foods Group Board of Directors and UK Senior Management Team accepts responsibility and are committed to uncover, prevent and eradicate modern slavery and hidden labour exploitation from own operations and global supply chains.

SUPPLY CHAINS

We recognise the responsibility that we share with our suppliers to buy and sell products in an ethical manner. There are relationships with external businesses for the sourcing of products around the globe; We work with more than 100 suppliers in 16 different countries in Europe, North Africa and North and South America. Our supply chain varies from one tier to more complex multi-tiered suppliers.

Chaucer Foods has built long-term relationships with suppliers worldwide. All our products are sourced from approved, nominated suppliers who have passed a supplier approval verification process and have achieved our ethical requirements.

Chaucer Foods Group's supply chain has been identified as being the area of highest risk in terms of occurrences of modern slavery. In order to drive out any acts of modern slavery, the following actions are being taken:



As part of the company's due diligence process into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by those businesses. Imported sources from outside of the UK and EU are potentially more at risk of slavery and human trafficking issues. These areas will be monitored closely and continuously by Senior Managers in order to ensure that the company has no involvement in slavery or human trafficking.

As part of our company's due diligence process we audit our suppliers on a regular basis. The auditing process is either through physical audits or assessment questionnaires that include a range of questions on human rights. Suppliers that are considered at higher risk are potentially required to be audited independently.

Chaucer Foods Group will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company Directors and Senior Management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources, training and investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

OUR APPROACH

Chaucer Foods Ltd are committed to transparency and collaboration in our efforts to migrate modern slavery.

We have developed and embedded a human rights due diligence framework that continuously assesses human rights risks within our business and supply chains.

Direct Employees

Chaucer Foods alleviates the likelihood of modern slavery occurring within its teams of direct employees through strict recruitment and HR procedures. Chaucer Foods have also appointed members of staff who will act as modern slavery reps who can inform and report to managers if they have any concerns about their colleagues through the internal whistleblowing process.

Employees through recruitment agencies and other sources

Agency workers are recruited indirectly by Chaucer Foods through trusted, well established and accredited sources who provide full assurance that they fully comply with all legal requirements regarding the rights and welfare of employees.

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investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

POLICIES

Our policies reflect commitment to ethical business activities and to ensure that everyone is treated with dignity and respect.

- Ethical Trading Policy
- Human Rights Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing policy
- Preventing Hidden Labour Exploitation Policy
- Policy on Forced Labour within the supply chain
- Responsible Recruitment Policy
- Child Labour Policy
- Grievance Procedure

DUE DILIGENCE

Our Human rights due diligence framework focuses on engagement with our suppliers with the intention where needed to improve worker welfare and closely monitor health and safety, outsourced labour management, grievance mechanisms, worker representation, living accommodation standards and transport provision throughout our own operations and supply chains.

We demonstrate our due diligence by risk assessing suppliers within our supply chain, conducting 2nd party audits & visits, monitoring 3rd party audit results, and providing training to aid awareness.

KEY PERFORMANCE INDICATORS

Our Human Rights KPIs show how successful our activities and programs are. They are critical in helping us understand the effect of our efforts and where further improvements can be made. Our Human Rights KPIs are reviewed and communicated to our stakeholders annually.

TRAINING & AWARENESS

All employees at Chaucer Foods receive training on modern slavery awareness. Our management team can also access specific e-learning courses on modern slavery-related topics via web-based platforms.



In addition, we require our UK labour providers to complete the Stronger Together Modern Slavery program and educate temporary workers on the issue during the registration process.

COLLABORATION

Chaucer Foods Ltd active members of the following Organisations: Ethical Trading Initiative (ETI), Supplier Ethical Exchange (SEDEX), Association of Labour Providers (ALP), Stronger Together,

FOCUS AREAS

Chaucer Foods are committed to gaining a greater understanding of its supply chains and aim to work towards a greater transparency and responsibility concerning the people working within them.

We plan to work together and monitor closely both direct and indirect staff to ensure that we eradicate the occurrence of modern slavery, human trafficking, forced labour and violations to labour standards within the Chaucer Foods Group.

- Continue to promote modern slavery and hidden labour exploitation training to overseas suppliers and labour providers.
- Continue the use of the Modern Slavery Key Performance Indicator metrics to deliver continuous improvement and evaluate our success.
- Continue organising surveys to collect anonymous worker feedback on human rights and welfare.

This statement has been approved by the Chaucer Foods Board of Directors and is made in accordance with Section 54(1) of the Modern Slavery Act 2015.

December 2023