

## Modern Slavery & Human Trafficking Statement

For Financial Year ending 31 March 2026

This statement is made pursuant to **Section 54(1), Part 6 of the Modern Slavery Act 2015** and sets out the steps taken by Abergavenny Fine Foods Ltd ("AFF") to prevent modern slavery and human trafficking in our business and supply chains.

### Our Business

Abergavenny Fine Foods is an FMCG food manufacturer operating within the chilled and dairy categories across the UK and Eire.

### Our Commitment

AFF is committed to conducting business ethically, with integrity and transparency. We take a zero-tolerance approach to modern slavery and human trafficking and are committed to preventing such practices in our operations, supply chains, and business relationships.

We expect the same high standards from all our suppliers, labour providers, and business partners.

### Definitions

Modern slavery is an umbrella term covering a range of exploitative practices, including:

- **Human trafficking** – the movement of people by coercion, deception, or abuse of power for the purpose of exploitation
- **Forced or compulsory labour** – work carried out under the threat of penalty
- **Bonded labour** – where wages are used to repay debt, often leaving little or no income
- **Child labour** – work that is harmful to children or interferes with their education

### Our Policies

AFF has several policies that support our commitment to preventing modern slavery, including:

- Dignity at Work Policy
- Whistleblowing Policy
- Ethical Trading Policy
- Child Labour Remediation Policy
- Anti-Bribery Policy

These policies are reviewed regularly and communicated to employees and relevant stakeholders.

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## **Our Procedures**

**Right to Work:** All employees are subject to statutory right-to-work checks before employment begins.

**Agency Workers:** All labour providers must meet strict compliance standards before being approved, including:

- A valid GLAA (Gangmasters and Labour Abuse Authority) licence
- Participation in Stronger Together (training or partnership)
- A documented whistleblowing policy
- Full right-to-work and identity checks
- Compliance with National Minimum Wage and National Living Wage requirements

Agencies are subject to ongoing monitoring and periodic re-audit.

## **Our Supply Chain**

AFF operates a preferred supplier approval process. Due diligence is conducted before engagement, including:

- Legal name and registration verification
- Companies House checks
- Screening for adverse media and criminal convictions
- Ethical trading declarations

Suppliers must meet the same labour standards required of our agency providers. International suppliers must pay at least the legal minimum wage applicable in their country of operation.

AFF reserves the right to terminate contracts if any instance of modern slavery, forced labour, or human trafficking is identified.

These requirements are governed by our Ethical Trading Policy.

## **Training and Awareness**

Our induction programme includes training on modern slavery awareness and the ETI Base Code.

HR and Technical teams complete Stronger Together training, ensuring they can:

- Identify risk indicators
- Respond to concerns
- Support ethical recruitment and employment practices

## **Responsibility and Governance**

The Board of Directors has overall responsibility for preventing modern slavery within AFF, supported by the Senior Management Team.

The HR function is responsible for implementing procedures, maintaining controls, and ensuring compliance. All managers are responsible for ensuring that their teams follow this policy.

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### **Breaches**

Any breach of this policy by an employee, manager, or director will be treated as misconduct and may result in disciplinary action, up to and including summary dismissal for gross misconduct.

### **Policy Status**

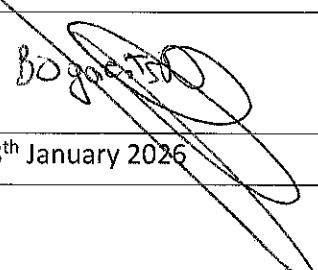
This statement does not form part of any contract of employment. AFF reserves the right to amend this statement and associated policies at any time.

### **Data Protection**

For information on how personal data is handled, please refer to the Company's Data Protection & GDPR Policy, available from HR.

### **Approval**

This statement was approved by the **Board of Directors** on: **8<sup>th</sup> January 2026**

<b>Managing Director (Please Print)</b>	Brian Bogaerts
<b>Managing Director's Signature</b>	
<b>Date</b>	8 <sup>th</sup> January 2026

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