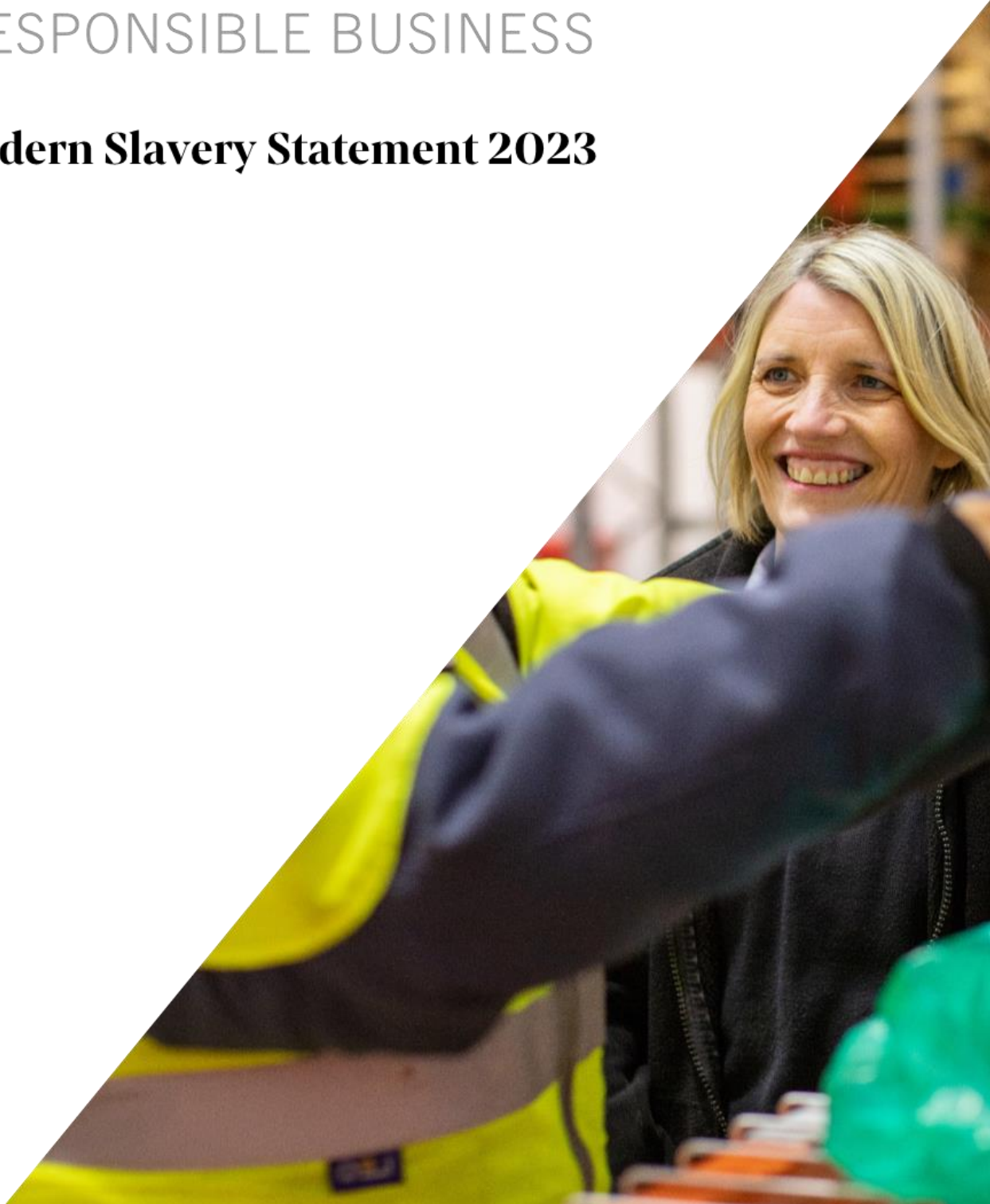


Financial year ending
31st December 2022

Samworth Brothers

RESPONSIBLE BUSINESS

Modern Slavery Statement 2023



Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. This statement outlines the progress Samworth Brothers (Holdings) Limited has made during the financial year ending 31st December 2022.

Our business and supply chain

Samworth Brothers (Holdings) Limited is a privately owned, fourth generation family business dating back to 1896, with all operations located in the UK.

This statement is produced for Samworth Brothers (Holdings) Limited and covers the following legal business entities:

- Samworth Brothers Limited
- Gibbs Croft Limited – trading as Soreen
- Manton Wood Limited
- West Cornwall Pasty Co. Limited
- Higgidy Ltd

The company specialises in manufacturing high quality chilled and ambient products. The business operates in food to go, savoury pastry, prepared meals, sausages, cooked meats and plant-based foods. The group owns several popular brands including Higgidy, Soreen, Ginsters, Urban Eat, and the West Cornwall Pasty Co. Other brands include the pie specialists Walker & Son and Dickinson & Morris. Our customers are mostly large UK retailers, with some of our products being manufactured for food to go locations. Additionally, the group owns several businesses that focus on service provision, these include Samworth Brothers Supply Chain (SBSC) and Fresh Food for Now Company that provide logistics services, and Westward Laboratories, a food safety testing laboratory.

More than 11,500 people work in the business, and we operate from some of the most well-invested and modern food manufacturing sites in the UK. Most of our people are based at our manufacturing sites, with others working across the country in logistics and distribution roles.

During 2021 we completed a materiality assessment to understand key areas of focus and revised our Group Responsible Business Strategy. Our new strategy is aligned with our core purpose of doing good things with great food. It is comprised of three pillars:

- 1) Taking action on climate
- 2) Sourcing with care
- 3) Supporting health and wellbeing

Underneath these pillars we have nine focus areas, with action on modern slavery included in both Sourcing with Care (for our supply chain risks) and Supporting Health & Wellbeing (for our own operations risks).

Board Approval

This statement, which is subject to annual review, has been reviewed by senior management and has been reviewed and approved by our Group Chief Executive Officer.



Hugo Mahoney

Group Chief Executive

June 2023

Tackling modern slavery in our businesses

A project team was established to review our approach to tackling modern slavery within our business and this continued to meet in 2022.

We have partnered with Slave-Free Alliance - a social enterprise and membership initiative launched by anti-slavery charity and victim advocacy organisation Hope for Justice. Our incident response process has been developed with guidance from Slave-Free Alliance. Colleagues from different functions at a site were involved in creating this in two workshops run by Slave-Free Alliance. Further input was provided by other site People Leads and colleagues that work in group functions. This has helped to ensure we have created a robust process that is appropriate for our own operations.

We have promoted Stronger Together since 2013. Stronger Together is a multi-stakeholder initiative aimed at tackling modern slavery in supply chains. We also utilised resources from Stronger Together to help us conduct a gap analysis of our progress.

Most of our workforce are employed on permanent contracts. However, to respond to the peaks and seasonal variance in food manufacturing we partner with several GLAA registered labour providers. We have long standing relationships with our key recruitment providers, and they have robust onboarding and induction processes that highlight how to identify modern slavery to all workers. Additionally, we conduct regular audits of our recruitment providers as part of our due diligence in this area.

We encourage our people, customers, and other business partners to report any concerns related to ethical issues, within our business. This includes highlighting any red flags that could be indicators of modern slavery. Our Whistleblowing Policy is prominently displayed at all sites in areas people frequent. This provides details of our confidential, independent hotline which individuals can use to highlight any concerns they may have.

Training and awareness

During 2022, a range of colleagues attended Stronger Together training. Our company induction includes how to spot the signs of modern slavery and how to report it. The Stronger Together video forms part of this induction for all permanent and agency colleagues. Additionally, all colleagues receive a copy of our electronic handbook - this includes the Stronger Together Video and highlights the risks, and provides practical support.

As part of the launch of our Responsible Business strategy we conducted three workshops exploring best practises in responsible sourcing and preventing modern slavery. Following a strategic review of responsibilities and accountabilities in this area we intend to develop further education across the organisation.

Our Policies

Our Group Responsible Business Team and People Team are responsible for several policies that help our business to combat modern slavery. These policies are approved by the relevant Group Executive Director.

- Equality and Diversity
- Modern Slavery and Forced Labour
- Human Rights
- Right to Work
- Bullying and Harassment
- Bribery & Corruption
- Community Relations
- Whistleblowing

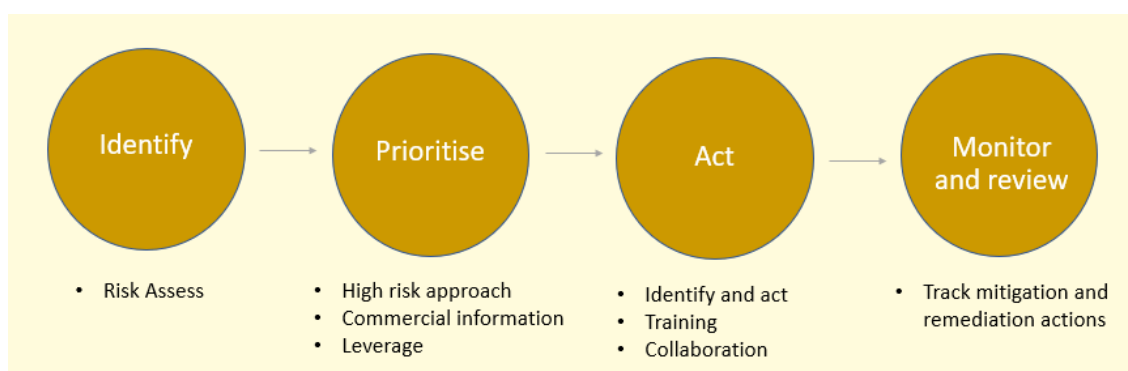
Human rights due diligence in our supply chain

Our supply chain is global, and we continually aim to strengthen our approach to anti-slavery due diligence. As would be expected of a major food manufacturer, we currently source several thousand ingredients, such as meat, produce, dairy, bakery items, palm oil and herbs and spices. The products we purchase fall into three major categories: ingredients, packaging, and indirect goods and services. A large number of items are sourced from the UK, but we also have a significant number of international suppliers.

We utilise a leading supplier management platform, which has advanced our supplier approval procedure, risk assessment and delivered enhanced supply chain traceability.

We have long standing relationships with many of our suppliers both in the UK and overseas. We recognise that modern slavery is predominantly a hidden crime, and we have a role to play in uncovering and eradicating it in our supply chain.

We adopt an industry best practice due diligence methodology. We have continued to strengthen and develop our process, which is built on four core principles:



- **Identify** - mapping the supply chain broadly to assess raw materials and geographical risks of modern slavery and human trafficking.
- **Prioritise** - addressing the highest risk raw materials within our supply chain.
- **Act** - collaborating with our suppliers and other stakeholders to encourage the eradication of forced labour and promote worker representation.
- **Monitor and Review** - strive for continual improvement in our process through monitoring KPIs and reviewing the outcomes achieved from the action taken.

One key tool that we use to aid risk identification is the Supplier Ethical Data Exchange (Sedex). We are Sedex members and have invested in AB membership, which enables us to view suppliers' ethical trade data. As a condition of supply our tier one suppliers and prioritised tier 2 suppliers are required to join Sedex as B members, where they complete a Self-Assessment Questionnaire and link to Samworth Brothers to share this information. We also monitor ethical audits on Sedex. Our supplier management platform has been built to include data fields relating to Sedex and country of origin human rights risk metrics. We have established several Responsible Business KPIs linked to our management of suppliers on Sedex, such as the percentage of suppliers linked.

We work proactively with suppliers to ensure that appropriate actions are taken with any identified risks to ethical trade standards. In 2022 we continued to map specific identified supply chains to assess any additional new risks.

In December 2022 we launched our Responsible Sourcing Charter – this provides our suppliers with guidance on our requirements. This document also highlights how we are looking to develop supplier engagement in this area with our Responsible Sourcing Programme to be launched in 2023.

Collaborative Working

Modern slavery and human rights violations are global issues that we cannot tackle in isolation. Therefore, we work closely with our suppliers, customers, and peers to identify issues. We were founding members of the Food Network for Ethical Trade (FNET). FNET is an initiative made up of UK-based suppliers and retailers whose mission is to improve human rights in global food supply chains through a common approach to managing ethical trade.

We actively participate in several FNET working groups; collaborative forums that allow members to develop common approaches to ethical trade. We have contributed to working groups in recent years, and have played a leadership role.

Samworth Brothers are founding supporters of the Modern Slavery Intelligence Network (MSIN), a pioneering non-profit collaboration in the UK food and agriculture sector. Please visit www.msin.org.uk for further details.