



FY 2024/25

MODERN SLAVERY STATEMENT

UPDATED: 2025

DOCUMENT PURPOSE

The UK Modern Slavery Act 2015 (section 54) requires all businesses to state the actions taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. Avara Foods Ltd is one of the largest UK food businesses, supplying major supermarkets and popular restaurants.. Over the last five years, we have developed the management and controls to reduce the risk of Modern Slavery and Exploitation within our supply chain. This overview provides an update on how we continue to do so and is available on the Avara Foods homepage – www.avarafoods.co.uk.

Over the last year we have continued to reduce the likelihood of exploitation within our business: educating our people and supply partners and implementing automation to reduce our reliance on unskilled and agency labour. Following the revised guidance for Modern Slavery Disclosures we have updated this document to comply with Level 1 reporting and work towards Level 2 disclosures

ORGANISATIONAL BACKGROUND

Avara Foods Ltd manages an extensive supply chain which includes poultry farming, processing, and distribution, with a team of almost 6,000 people operating in England and Wales.

Our supply chain spans agricultural inputs, packaging, logistics, equipment, and contract services in the UK and internationally. Avara Foods Ltd operates around four core values: Inclusive, Ambitious, Excelling and Integrity. These four values shape our standards, our decisions, and our expectations.

The information in this update applies to Avara Foods Ltd and its subsidiary businesses, Faccenda Foods and Freemans of Newent, covering the financial year 1st June 2024 to 31st May 2025. During this period, we reported a turnover of £1.316bn.



GOVERNANCE AND POLICIES

In May 2025, we launched our Code of Conduct, setting clear expectations for how people should behave at Avara, and what they can expect from Avara in return. The Code reinforces our commitment to fostering a culture where everyone is free to be themselves, where diversity is a strength, and where respect is met with respect. It underpins our approach to ethical conduct and forms part of our wider governance framework helping to safeguard human rights across our operations and supply chains.

We maintain a comprehensive suite of [policies](#) that support this approach, including our [Human Rights Policy](#), Anti-Exploitation Policy, Employee Code of Conduct, [Supplier Code of Conduct](#), Child Remediation Policy, three recruitment-focused policies (Recruitment and Selection Policy, Legal Eligibility to Work Policy, and Recruitment Fees and Remediation Policy), and our Whistleblowing Policy.

We also maintain an Anti-Bullying and Harassment Policy, which includes measures aligned with UK legislation on sexual harassment. This policy reinforces our commitment to providing a safe and respectful workplace, free from discrimination, intimidation, or abuse — principles that underpin our broader efforts to protect people from harm and prevent exploitation in all its forms.

Overall responsibility for these policies rests with our Executive Board, with day-to-day management led by the Heads of HR, Head of Sustainability, and the Head of Procurement.





SECTION 1:

Risk Assessment and Mitigation

UNDERSTANDING AND MITIGATING THE RISK OF MODERN SLAVERY

Understanding and mitigating the risk of modern slavery is key to our ongoing success. In the last year we have taken the following steps to reduce risk:

- Carefully manage our reliance on agency employment and work closely with our agency partners. During the reporting period, our temporary agency usage was 13%. This slight increase reflects a period of organisational change, following the closure of one site and the expansion of two others, which resulted in an overall increase in headcount. This is a temporary and acceptable increase during this period of transition.
- Agency workers continue to be employed on contracts of up to 12 weeks, in line with our established approach to avoid long-term agency working — a known risk factor in modern slavery.
- We encourage our recruitment partners to become Stronger Together Business Partners and utilise the Responsible Recruitment Toolkit (RRT) both promoted by the Association of Labour Providers (ALP). These measures, in addition to our own six-monthly audits of our agencies, provide us with confidence of their own risk mitigation.
- We continue to prioritise recruiting new employees directly, rather than via an agency.
- We are an active member of Food Network Ethical Trade (FNET), sponsoring the worker representation initiative as well as participating in the effectiveness and relevance of the Gangmaster Licencing Abuse Authority (GLAA)/Supermarket protocol.
- We remain active members of the Association of Labour Providers (ALP) and during this period we were officially recognised as a Stronger Together Business Partner. Achieving this status involved a thorough assessment of our operations and supply chain and demonstrates our continued commitment to tackling labour exploitation.
- Last year, our Modern Slavery Champions completed the Stronger Together Introduction to Modern Slavery training, and members of our Ethical Steering Group attended the Advanced Stronger Together programme. The knowledge gained continues to strengthen our awareness and capability to identify and address risks of labour exploitation across our business.

CHANNELS FOR THE WORKER VOICE



The UN Guiding Principles on Business and Human Rights (2011) require businesses to provide effective grievance mechanisms for victims of human rights abuses. Establishing effective channels for workers to communicate concerns provides a means to identify welfare issues and potential risks of exploitation.

At Avara, channels for effective grievance and communication operate at several levels, as shown in Figure 1, and are accessible to both employees and agency workers. Over the past year, we have strengthened this framework through improved electronic communication tools, online portals, and a greater focus on one-to-one and face-to-face conversations.

We have also introduced Regional Colleague Councils, bringing together management, colleagues and unions in four councils for consultation and negotiation of key business topics and challenges. We have also strengthened local site forums, creating a more inclusive and connected communication structure across the business. Alongside this, we continue to prioritise inclusive communication, ensuring that information is accessible, clearly understood, and that every colleague feels informed, engaged, and able to raise issues confidently.



Figure 1 Channels for the worker voice



SECTION 2:

Due diligence

SUPPLY CHAIN ENGAGEMENT

The Sedex platform provides visibility throughout the supply chain both upstream to our customers and downstream from our suppliers of SAQ's and SMETA audits.

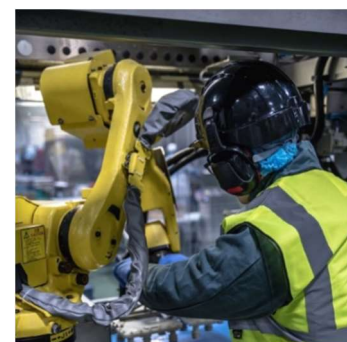
We continue to utilise the Sedex platform to ensure that our supply chain partners have effective controls and that our values are represented. We have 212 suppliers on the Sedex platform, focusing on ingredients and packaging, where we can review SAQ's, risk and SMETA audits.

We utilise the risk assessment tool, to complement formal assessment processes. Our Oracle system provides enhanced data and insight, enabling us to review suppliers and engage with them in a more robust way on a range of subjects, including pre-qualification, ongoing management and communication.



WHISTLEBLOWING SERVICE

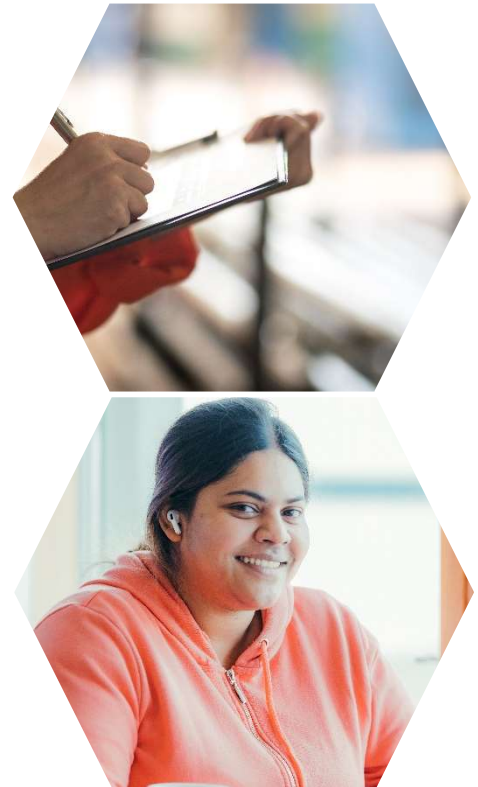
Our Whistleblowing service remains available and accessible by colleagues and includes our third-party Farming Partners. Independently run to ensure anonymity if required, the service is available 24/7 and, while concerns have been raised, none have related to potential modern slavery cases in the last 12 months.



SUPPLIER CODE OF CONDUCT

Recognising that our extended supply chain is an integral part of our business and that its standards must be consistent with our own, we have updated our Supplier Code of Conduct, which forms part of the supplier pre-approval process alongside financial and food safety considerations. Ethical practice is an essential part of this code, and we make clear that suppliers need to meet our expectations.

Our Head of Procurement has completed the CIPS Ethical Procurement and Supply qualification 2022 and all colleagues within procurement have attended the Human Rights & Ethics workshop. Our Procurement Manager attended the training session on Modern Slavery through Purchasing Practices



AUDITS AND REVIEWS

We have moved to a biennial SMETA auditing cycle for all seven operational sites to align with our customers on standards, better track progress against key objectives, and ensure that audits support our broader business goals. During this reporting period, we had five [SMETA](#) audits, all scoring medium risk*.

To strengthen our ongoing monitoring, we also conduct six-monthly Self-Assessment Questionnaires (SAQs) across all operational sites. These assessments help us review compliance with our ethical standards, identify potential risks relating to labour practices and worker welfare, and track progress against our commitments.

Outputs from our internal audits and monthly compliance checks — including worker interviews with both colleagues and agency workers — continue to be reviewed, and processes updated accordingly.

Our agency partners play a key role in ensuring we recruit new colleagues in full accordance with compliance standards. We continue to audit our agencies on an annual basis, while also carrying out regular in-year checks.

We also actively support auditing and compliance across our agriculture sites, including both owned and partner farms. These audits help ensure consistent labour standards, ethical practices, and worker welfare across all parts of our supply chain. Findings from these reviews are used to strengthen collaboration and drive continuous improvement across our agricultural operations.

We continue to focus on the safety and wellbeing of our employees and engage in both internal and external independent Health & Safety (H&S) audits. These, along with our local Health and Safety Managers, form an important part of engaging with colleagues and maintaining our standards. We continuously strive for best practice within our industry to keep our people safe.

*Medium risk - The poultry sector is often classified as medium risk by default because of inherent industry factors including reliance on migrant or agency labour, repetitive work, cold and wet environments in processing plants, seasonal demand spikes and the high volume of manual handling and knife work.

SECTION 3:

Training, Awareness, Monitoring and Evaluation

TRAINING AND AWARENESS

Education on modern slavery, its risks, controls, emerging issues, and best practices has continued across all areas of our business. This year, we built on previous work by continuing to deliver targeted training and by updating our induction programme to include enhanced guidance and awareness for new colleagues and agency workers.

Training remains tailored to key touchpoints throughout a colleague's employment journey — from onboarding, where general awareness and available support are introduced, to role-specific learning for line managers and HR teams, ensuring they understand their responsibilities and how to identify and respond to potential risks.

Our Human Rights and Ethics Steering Group meets regularly to oversee progress and ensure alignment across the business and with our customers and suppliers.

MONITORING AND EVALUATION

Our robust control measures mean that the likelihood of infiltration is significantly reduced. First and foremost, we are determined not to be an easy target for traffickers and illegal gangmasters.

Ultimately, effectiveness is determined by the number of instances of modern slavery that go unaddressed within our business.

In our 2019 Modern Slavery update we reported about a live case that we identified and worked with relevant authorities to investigate. We have now successfully detected and supported two cases that have resulted in successful prosecutions by the authorities.

If we have any suspicion that modern slavery is taking place within our supply chain, our priority is to protect the victims, through careful and confidential management of the case and by supporting them into free employment, including elsewhere within our business.



SECTION 4:

Next Steps

We remain committed to preventing modern slavery across our operations and supply chain and have an ongoing commitment to:

- **Collaboration:** We will continue to work with FNET, GLAA working groups, Stronger Together, the ALP, and retailer ethical leads to stay aligned with best practice and emerging risks.
- **Training:** We will review, update and deliver workforce training to maintain awareness and deepen specialist knowledge where needed.
- **Supplier Oversight:** Supplier management will be strengthened through Sedex and expanded Oracle ERP requirements, with further SMETA ethical audits planned within 12 months. Supplier questionnaires are now subject to a formal, regular review with the procurement team. Deepening visibility beyond Tier 1 suppliers and strengthening subcontractor oversight. We will be developing measurable KPIs to track effectiveness and publishing progress annually
- **People Practices:** We prioritise direct recruitment, inclusive communication, colleague engagement, and ongoing education to make modern slavery difficult to establish within our business and supply chain.
- **Governance:** Strong management oversight and clear reporting processes remain in place, encouraging colleagues to speak up and ensuring continuous improvement.
- **Tracking Our Effectiveness:** To strengthen accountability and transparency, from FY2025/26 we will measure progress against a focused set of key performance indicators (KPIs) covering governance, supplier due diligence, training, and worker engagement. These will enable us to evaluate the effectiveness of our approach and demonstrate continuous improvement.

SECTION 3: Training, Awareness and Next Steps

We will report performance against these KPIs in our next Modern Slavery Statement.

Focus Area	Key Indicator	Target FY25/26
Governance	HR & Ethics Steering reviews held	Minimum 4 per year
Supplier Risk	Tier 1 suppliers with valid Sedex SAQs and audit	≥90%
Labour Practices	Approved labour agencies audited	100%
Worker Voice	Reported issues resolved within timeframe	≥95%
Training	Employees completing Modern Slavery awareness training	≥95%
Effectiveness	Confirmed modern slavery incidents	0

This statement has been approved by the Board of Directors of Avara Foods Ltd on 6th November 2025 and signed on its behalf by



Chris Hall
Chief Executive Officer
Date: 6th November 2025