



## MODERN SLAVERY STATEMENT MAY 2024

### 1. Introduction

Respect for Human Rights is a core value of Premier Foods. We believe that everyone is entitled to enjoy Human Rights and should be treated with dignity. Modern slavery is a key part of Human Rights and is a UK and global issue covering a range of exploitation and includes areas such as human trafficking, sexual exploitation, forced labour, debt bondage, domestic servitude, criminal activities, and child labour. Modern slavery involves the recruitment, movement, harbouring or receiving of children or adults using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.

At Premier Foods we have a zero-tolerance approach to modern slavery and this statement is made in accordance with our obligations under the **Modern Slavery Act 2015** and sets out what we are doing to safeguard the people we employ, the people who work in our supply chains and the people who live in the wider communities in which we operate both nationally and internationally.

In last year's Modern Slavery Statement, we committed to playing our part in tackling modern slavery and we have met this commitment. In addition to this, we have implemented a Human Rights Policy. We are determined to be open about the challenges that we face, and we understand that as a business we need to help prevent these crimes by working in partnership with other organisations in the food industry, and with our stakeholders, suppliers and customers. It is only by working together that we will be able to prevent these crimes.

Premier Foods and each of its subsidiaries is committed to respecting and safeguarding the people who work for us, with us, or are affected by our activities. As a business, we want to be a force for good in the hope that the crime of modern slavery can be eliminated.

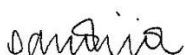
Premier Foods falls within the reporting scope of the UK Modern Slavery Act 2015 and this statement for our financial year ending 31<sup>st</sup> March 2024 (FY24) describes the actions we have taken to identify and prevent modern slavery from taking place in our operations and supply chains.

This statement, which will continue to be subject to annual review, has been reviewed by senior management and has been reviewed and approved by the Premier Foods plc Board on 18<sup>th</sup> July 2024. The entities to which this Modern Slavery Statement for FY24 applies to are:

- Premier Foods Group Limited
- Premier Foods Group Services Ltd
- Knighton Foods Limited (ceased manufacturing on the 31<sup>st</sup> March 2024)

Alex Whitehouse  
**Chief Executive Officer**  
Date: 18<sup>th</sup> July 2024

The Human Resources Director is accountable for ensuring best practice is maintained internally and the Director of Procurement is accountable for reducing and mitigating external risk through our Supply Chain.



David Wilkinson  
**Human Resources Director**



Gareth Pullan  
**Director of Procurement**



## 2. Our Business

We are one of Britain's largest listed food manufacturing companies employing around 4,000 colleagues. We operate primarily in the ambient food sector which continues to be the largest sector within the total UK grocery market. We are proud to be a British business, and our 7 manufacturing sites across the UK make 92% of the food we produce using quality ingredients and wherever we can, we source sustainably from British suppliers and farmers. In addition to this, 80% of our third-party spend is with UK-based suppliers.

We currently develop our portfolio of brands in five key categories:

- Flavourings & Seasonings
- Cooking Sauces & Accompaniments
- Quick Meals, Snacks & Soups
- Ambient Desserts
- Ambient Cake

In addition, we have a portfolio of other branded food products and a non-branded food business which manufactures products, such as cakes and desserts, on behalf of many of the UK's food retailers. We continue to work hard to expand internationally by finding new markets for our brands around the world. We have a significant business in Ireland and Australia with established relationships with major food retailers and an ambitious plan to grow our business in the US. We have continued to deliver progress internationally, with International Sales up +12% in the last year, building distribution across our key focus markets.

More information on our business can be found in our latest **Annual Report** and **Financial statements**, and our latest **Sustainability Report**, all of which can be assessed at [www.premierfoods.co.uk](http://www.premierfoods.co.uk).

### 2.1 Our Purpose

Our Purpose is to '**enrich life through food**', and this reminds us of what we're here to do. It guides us, it motivates us, and it's reflected in every element of how we run our business today. It will be achieved through three focus areas.

- Enriching the lives of our **consumers** and **customers**. We create food that enables people to lead sustainable, healthier lifestyles and by creating loved brands that bring moments of enjoyment to their lives throughout the day.
- Enriching the lives of **colleagues** by creating an inclusive culture of entrepreneurship, where people can reach their full potential, as well as attracting the very best talent and embracing diversity along the way.
- Enriching the life of **our planet** by making food in a way that respects the world's resources, the same resources we rely on to make our delicious food. Whether that's reducing our environmental footprint through climate action, reducing food waste, or maintaining high ethical standards across our supply chain.

Our Modern Slavery statement fits succinctly with enriching the lives of our colleagues; we nurture our workforce, ensuring that modern slavery plays no part in our recruitment, colleague life cycle or our supply chain.



Our Environmental, Social & Governance (ESG) strategy demonstrates how we will pursue our purpose. Our focus on ensuring modern slavery does not exist in any part of our business falls within the ‘nourish the lives of our colleagues and communities’ pillar. This strategy is at the heart of our business plan and all parts of the business will continue to work hard to ensure all Premier Foods activities; including those which relate to eliminating the possibility of modern slavery in our colleague processes and procurement supply chain, meet the requirements of our ESG strategy.

## 2.2 Our Values & Leadership Behaviours

We’re committed to creating a truly great place to work. Our shared values give us a common framework for decisions and help guide us in the way we do things, and we challenge each other to live them day by day. Over the last few years, significant progress has been made in embedding the Group’s purpose and values across the business, increasing investment in communication and engagement with colleagues, and up-weighting training in areas such as leadership and inclusion.

Our shared values are the DNA of our business and act as our moral compass helping guide us in the way we do things. They give us a common framework for decision making and enable us to challenge ourselves, and each other, to ensure we live them day-to-day. For full details of our values please visit [www.premierfoods.co.uk](http://www.premierfoods.co.uk).

Over the past three years, we have been rolling out our new Leadership behaviours for all colleagues to aspire to. Two of these behaviours, inspire ownership and stay curious are imperative to the role colleagues play in ensuring that modern slavery does not enter our supply chain or recruitment processes.

We currently work with two strategic partners, Mondelez and Nissin and this policy statement does not cover these two organisations.

## 2.3 Our Supply Chain

Premier Foods spends over £750m on externally sourced goods and services annually and currently work with over 1,500 active suppliers and our aim is to develop long-term, sustainable partnerships with key suppliers which drive mutual benefits. Our top 500 suppliers, based on total annual spend, now account for just under 97% of our total spend, whilst our top 250 account for around 90% of the goods and services that we purchase.

We recognise that small and medium sized enterprises (SME’s) play an important role within Premier Foods and currently they make up over 34% of our active supply base.

Our Procurement colleagues work with suppliers to build effective and transparent supply chains. Our suppliers have an important role to play as we are reliant on our suppliers for the ingredients and services we use to produce our much-loved brands. Therefore, Procurement have a rigorous supplier approval process. We require all Direct ingredients, packaging and bought-in-finished-goods suppliers to be connected to us via the Supplier Ethical Data Exchange (SEDEX) and we continue to bring other relevant, existing suppliers into the scheme; progressively driving SEDEX membership across our supply base.

In line with our commitment to upholding high ethical standards, Premier Foods has made significant progress in sourcing high-risk commodities such as cocoa, palm oil, and soy from certified sustainable sources, aiming to protect human rights and eradicate modern slavery. We are proud that 100% of our directly purchased palm oil is RSPO Certified. Additionally, all our directly purchased soy products



and 97% of our directly purchased cocoa powder and chocolate are either certified or come from low-risk origins. These certifications enforce stringent labour standards and help protect vulnerable communities from exploitation and forced labour.

Given the wide range of products and services we produce and our significant number of suppliers, we have established an **Ethical Trading Policy**, which is based around the internationally recognised ETI Base Code of Labour Practices, and this sets out the minimum requirements we expect from suppliers in terms of labour standards, namely:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

As part of our on-going supplier communication process, we undertake to issue suppliers a copy of the Premier Foods Group Standard Terms and Conditions for the Purchase of Goods and Services on an annual basis. We also use this opportunity to circulate key updated policy documents including our Ethical Trading Policy, ETI Base Code criteria and Anti Bribery and Corruption Policy and new for FY25 our Human Rights Policy.

## 2.4 Our approach to Audits across our Supply Chain

We believe it is important that we understand the impact that our goods have on the people that produce it. We have high ethical labour standards across our supply chain and request that our direct ingredients, BIFG (Brought in Factor Goods) suppliers, and packaging suppliers become members of SEDEX. We also request other indirect 'high risk' category suppliers (e.g. laundry, warehousing, logistics/warehouse and labour providers etc) also join SEDEX in order to help us gain greater visibility of key risks across our extended supply chain.

Based on risk, packaging, ingredient and bought-in-finished-goods suppliers who are a medium or high-risk supplier (determined by reference to the supplier geographic sourcing region and nature of the product supplied), will have a physical Premier Foods Technical audit. These audits are conducted by either a member of the Premier Foods compliance team or our contracted 3rd party auditing company. We support and help to develop our suppliers with regular technical reviews and engagement, so we are working together. With this approach we aim to foster an open and transparent long-term relationship with our suppliers.

There is an element of ethical auditing within the Technical Food Safety Audit which is used to establish if the supplier meets our requirements of being an active member of SEDEX by completing the self-audit questionnaire, have an SMETA ethical audit on a risk-based frequency and closing down any non-conformances raised during those SMETA audits. To ensure transparency with our suppliers, we ensure we have visibility of our supplier SMETA audit via SEDEX. All SMETA audits are audited against the ETI Base code criteria using the SMETA methodology and relevant country law.

All Premier Foods sites are registered on SEDEX, and all sites have a SMETA audit on an annual or bi-annual basis or as per customer requirements. These audits are available to our customers on SEDEX



where we give full transparency of our sites audits and self-audit questionnaire. Any non-conformances raised we ensure they are addressed, actioned, and closed out in a timely manner.

## 2.5 Our Manufacturing Operations

This policy statement applies to entities and sites owned and operated by Premier Foods and these are listed below. To date, we have not experienced any examples of hidden labour exploitation in any of our locations.

### Manufacturing Locations

- Andover
- Ashford
- Carlton
- Charnwood – closed on the 7/6/24
- Knighton – closed on the 31/3/24
- Lifton
- Moreton
- Stoke
- Worksop

### Office Locations

- High Wycombe
- Lutterworth
- Manchester
- St Albans
- Winchester

In March 2024, we proposed to close our Charnwood manufacturing site and entered into a period of consultation with colleagues. The consultation concluded and it was decided to permanently close the site. Manufacturing ceased at this site on 7<sup>th</sup> June 2024.

In October 2023, Premier Foods acquired the FUEL10k business offering a unique and differentiated proposition within the breakfast category due to its protein enriched product range. FUEL10k products are produced by co manufactures and co packers. These suppliers are based in England, Wales and Germany.

In January 2023 we proposed to close our Knighton Foods manufacturing site and entered into a period of consultation with colleagues. The consultation concluded and it was decided to permanently close the site. Manufacturing ceased on this site on 31st March 2024.

For The Spice Tailor brand that we acquired in 2022, we continue to produce the majority of its products in India, by way of outsourcing manufacturing to a small number of Global Food Standard Food Safety accredited suppliers. We are aligning them to our various technical standards and audit protocols.

## 3. Our Policies and Governance

### 3.1 Our Baked-in Behaviours and Policies

We are passionate about running our business in the right way and we have a strong set of principles to help us do that. We call them our Baked-in Behaviours. To be clear about what we stand for in these areas and what we expect from our colleagues, suppliers, customers and partners, we have a range of policies which we regularly review to ensure they reflect our drive for continuous improvement. The **Code of Conduct Ethical Trading Policy** and **Sanctions & Export Controls Policy** details the principles that we rely on to carry out our activities internally and externally, and are publicly available on our website, [www.premierfoods.co.uk](http://www.premierfoods.co.uk).



We are committed to safeguarding all human rights in line with the United Nations Guiding Principles (UNGP) on Business and Human Rights and tackling all forms of hidden labour exploitation, including slavery and human trafficking and have produced a **Human Rights Policy** that details the standards that we work to and includes all relevant policies in place to help identify and eradicate these practises within our own business and to reduce and eliminate risks across our complex supply chain.

### 3.2 Governance

We believe everyone at Premier Foods plays a part in delivering our Enriching Life Plan and sustainability lives at all levels of the business. The Modern Slavery Statement is overseen by our CEO and supported by the Premier Foods Executive Leadership Team (ELT). In addition, the statement is approved by the Board of Directors. Our Progress and updates are regularly reviewed with senior leaders in the ESG Governance Committee which is chaired by our CEO and includes members of our ELT and specialists from across the business. This Committee has oversight of our strategy and any ESG risks. Any specialist Working Groups, such as the Human Rights Group report into our ESG Governance Committee. We review our approach for governance on an annual basis to ensure we are focussing on the key areas to mitigate any risks.

Premier Foods' responsibility to respect Human Rights means we are committed to implementing the UN Guiding Principles on Business and Human Rights throughout our business and reporting on our progress in line with the Food Network for Ethical Trade (FNET) Due Diligence Framework. As part of this framework, we plan to identify our salient risks to prevent Human Rights risks to workers impacted by our activities and therefore as part of this process we will be ensuring all activities are in line with modern slavery prevention. To ensure this remains a regular focus for Premier Foods, we have set up a Human Rights Working Group to lead our work on adopting best practice in managing human rights, and therefore modern slavery risks.

### 3.3 Employment standards

Our Human Rights approach requires compliance with all applicable local laws and regulations. As a business, we align to the **Ethical Trading Initiative (ETI) Base Code**, which is an internationally recognised code of labour practice that applies to our business and the supply chains we choose to use.

Our respect for Human Rights is not limited to this code as we are committed to tackling all forms of Human Rights breaches. We have policies in place to meet the ETI base code requirements and to identify and eradicate any potential practices within our own business and to reduce and eliminate risks across our complex supply chain.

### 3.4 Recruitment

The group Recruitment Manager is responsible for ensuring that our in-house recruitment team and all 3<sup>rd</sup> party labour providers are briefed on our standards and expectations in relation to modern slavery. This will now include our new Human Rights Policy. The Procurement Team are responsible for ensuring that all supplier contracts in relation to recruitment have specific reference to our modern slavery requirements.

To ensure we are legally compliant in terms of recruiting colleagues, roles which are advertised internally and externally are done so using our HR database and Applicant Tracking System, MYHR. This ensures that we have the right checks in place to vet potential candidates legally in line with the



ETI Base Code. Recruitment at our manufacturing sites, is managed by the site HR team and conducted by team leaders and/or managers. Prior to an offer being made, it is the site HR teams that completes the relevant ID and right to work in the UK checks. On occasion where we recruit senior or confidential roles, we complete the onboarding process and checks manually.

For external offers for Head Office colleagues, we utilise the Trust ID system, which is run by a government registered business that provides electronic checks on future colleagues. This system checks records with the home office and ensures that the right to work document is verified and the photo ID is of a likeness to the person in the photo.

We recognise that having agency colleagues working within our business is vital and enables us to remain agile. To ensure that agencies are compliant with our policies, ethical standards and legislation, six monthly audits are conducted to ensure compliance where and when agencies are engaged.

We are proud to have received the Gold Charter Mark from the Social Recruitment Advocacy Group (SRAG). The SRAG Charter is a framework enabling the creation of social value through the adoption of socially responsible recruitment practices. The purpose of the Charter Mark is to recognise and promote excellence in social value recruitment, distinguishing organisations from others in their field. Holding the mark enhances an organisation's reputation by demonstrating commitment to high standards and best practice and drives a culture of continuous improvement. SRAG Charter Mark levels span Bronze, Silver, Gold and Ambassador levels.

In terms of our Early Talent, we are pleased to confirm that we have signed the "Apprentice Decent Wage Pledge" which means we pay our Apprentices more than the apprentice national minimum wage, to ensure they are paid a fair and decent wage.

Commencing in FY25, Premier Foods will run mandatory Recruitment training for all line managers in the business. A driver of this is to ensure that all managers are equipped to attract, interview and select future colleagues consistently and are legally compliant.

#### 4. Assessing and Managing Risk

We are planning to use SEDEX's risk assessment tool, RADAR, to help improve our risk assessment processes, particularly with the intention of helping to better understand our salient human rights risks. For FY25, we are increasing our resource in this space, with the introduction of an Ethical Trade Co-ordinator for six months, in partnership with SEDEX. The role will primarily liaise with our supplier partners to help ensure our supplier SEDEX data is updated regularly to help ensure we are assessing our risks based on up-to-date and accurate information.

During 2023 we updated our Ethical Trade Policy and expect our suppliers to comply with the internationally recognised labour standards and we will support them to comply with the Base Code of the ETI. During FY24, we partnered with EcoVadis which has enabled us to collaborate with our high impact suppliers in order to understand their sustainability performance via a well-recognised performance rating platform. In the first six months of our partnership, the majority of our high impact suppliers completed the EcoVadis assessment and are now working on corrective action plans. EcoVadis will be referenced in all Strategic Supplier Relationship Management (SSRM) reviews to ensure that we are constantly improving wherever possible the sustainable and responsible sourcing across our wider supply chains.



#### 4.1 Managing and mitigating risk

We recognise that we need to work in partnership with our supply chains and customers to mitigate and improve Human Rights issues. We are committed to driving best practice in protecting Human Rights in our supply chains with the aim that every worker is treated fairly, to prevent all forms of exploitation as like-minded businesses. We are committed to supporting supply chain workers by complying with our legal Human Rights obligations as defined at national, European, and international levels.

We are continuously reviewing our contractual documents to ensure our commitment to and our due diligence towards Human Rights especially modern slavery as part of business with Premier Foods. In addition, we have pre-requisites as part of our e-tendering procedure, ensuring that invited suppliers answer Human Rights questions amongst the broader ESG related questions.

Should we identify any potential non-compliances or risks, within our external supply chain, we first look to engage our suppliers and business partners to drive corrective actions that help address the underlying issues. Where direct engagement does not lead to meaningful progress, we consider all appropriate forms of leverage, including the reduction and/or termination of supply.

In terms of assessing and managing our internal risks, we conduct the below:

- Carry out monthly bank account checks to ensure that multiple colleagues' salaries are not being paid into the same bank account. Should we find examples of this happening we will follow up and check thoroughly.
- Encourage and support all colleagues to report suspected exploitation which may be occurring within, or linked to, our business and we will ensure the relevant policies and processes are in place to allow this and we will act accordingly.
- Take special care to ensure seasonal and temporary workers are made aware of our stance on modern slavery and we will ensure that at each site, there is a supervisor / manager who is identified as the key person to talk to should there be any suspicions or concerns.
- Report suspicions of modern slavery and hidden worker exploitation to the Gangmasters and Labour Abuse Authority (GLLA) and police as soon as we become aware of it.
- Insist that all recruitment agencies or other organisations involved in the recruitment of our colleagues sign our terms and conditions to adopt policies and procedures consistent with our stance on this topic.
- Not use any individual or organisation to source and supply workers without confirming that candidates are not being charged a work finding fee.

#### 4.2 External reporting "Whistleblowing"

Premier Foods is committed to conducting business with integrity and fairness, with respect for our **Code of Conduct, Values, Behaviours** and within the Law. We have a **Speaking Up Policy** which is available for anyone who works for, or on behalf of, the Premier Foods' group of companies. It also applies to anyone who has a business relationship with us for example, contractors, agency workers, customers, suppliers, distributors, and shareholders. As part of this policy, we provide an externally run 24/7 service, available online or via a freephone helpline, Safecall ([www.safecall.co.uk/report](http://www.safecall.co.uk/report) or





<https://www.safecall.co.uk/en/file-a-report/telephone-numbers/> where people can confidentially raise concerns regarding suspected misconduct and/or breach of Company Policy or employment law.

In order to make this more accessible to everyone working in our supply chain, we have published Safecall's details on our website during FY24. As a business, we strongly support feedback and open dialogue on human rights, and we encourage communities and/or individuals to raise any concerns with us directly.

The volume and nature of the calls received are monitored and any concerns are investigated by the senior management team.

## 5. Training

All colleagues at Premier Foods need to have a good understanding of what modern slavery is and how to raise any concerns. This is detailed in our site and Corporate Inductions. However, we recognise that there are key functions that need to have more in depth knowledge and understanding, such as our Human Resources and our Procurement/Technical functions and therefore as a business we invest more training for colleagues in these functions.

Premier Foods supports the Stronger Together campaign and each site is expected to maintain the Stronger Together Business Partner commitment. All new colleagues are trained in relation to this initiative.

Up to and including 31 March 2024 nine Human Resources professionals completed the Stronger Together 'Tackling Modern Slavery in UK Businesses' training. This training enables attendees to; understand what modern slavery, forced labour and hidden exploitation is, understand the potential risks and impacts of modern slavery, recognise the signs of someone that may be being exploited and how to respond and to be confident in their steps to deter, detect and deal with modern slavery if it becomes present in the workplace.

We will refresh our training every three years, and we will always look to ensure adequate numbers of colleagues complete this essential training to ensure modern slavery is prevented and is dealt with correctly if it is found within our organisation.

A senior member of our direct resourcing team has completed the 'Introduction to Responsible Recruitment'. At the end of this training the colleague was able to understand the principles and business case associated with being a responsible recruiter and to enable confidence in embedding responsible recruitment within our organisation. This training is due to expire in November 2025 when they will complete the training again.

Key members of the Supply Chain Team (Procurement/Technical) receive specific training on modern slavery and trafficking to raise awareness of the issues associated with modern slavery and to recognise and respond to indicators of human rights abuses. All new Procurement colleagues complete the modern slavery awareness training as part of their formal induction process, and this includes the use of external web-based training material and assessments. During the year, six procurement colleagues were trained as part of their induction programme.

The training is designed to promote a sense of responsibility to prevent modern slavery in both the Premier Foods business and its supply chain. It provides examples of the red flags for the relevant industry that we operate within and explains the organisations reporting procedures for suspected cases of modern slavery.



In addition to the above awareness training, during 2023 we designed a wider training programme for our senior management, business leaders and technical specialists across the business. This training is provided by recognised 3<sup>rd</sup> party experts, via masterclasses across a range of priority topics, including Human Rights. These sessions were designed to arm the participant with:

- A better understanding of human rights issues
- Knowledge of the external landscape and existing models of change
- A common set of reference points and language to take back to their teams.
- An understanding of the role Premier Foods plays in shaping a more sustainable and fair food system.

## 6. Collaboration

In an evolving environment where the challenges are difficult to manage and complex, it is clear that we need to ensure we are working with the right experts in this field to ensure that we are able to drive improvements in the fight against modern slavery. To do this, we have chosen to partner with key stakeholders.

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

Premier Foods became a member of FNET in February 2024. FNET is a collective of suppliers and retailers in our industry that focuses on the employment rights outlined in the ETI Base Code plus those associated with environmental impacts and privacy. As part of this membership, we have access to resources, training and opportunities to collaborate and be a force for good.

### 6.2 Stronger Together

Premier Foods supports the Stronger Together campaign which is a multi-stakeholder initiative aimed at reducing modern slavery. We are committed to building knowledge within our colleagues, and we actively utilise the Stronger Together tools available to us as members for our Corporate Induction and training of key functions to increase our understanding of the nature of hidden labour exploitation and also prevent its occurrence within Premier Foods. In addition to this, we also use the Stronger Together campaign resources such as multilingual leaflets and posters across all our sites again raising awareness but also ensuring colleagues know who to contact if they have any concerns.

## 7. Tracking our Progress

In order to tackle and minimise any risk in our value chain of labour exploitation, modern slavery and human trafficking we need to be open and transparent about our own activities as a food manufacturer of 4,000 colleagues and to the activities of our suppliers and customers.

We track our progress through a number of KPIs as these provide data to us on how effective our actions are to ensure modern slavery is not taking place here at Premier Foods.

### 7.1 Our commitments

- We will continue to work cross functionally with our Human Rights working Group covering key business areas such as HR, Procurement, Technical and Operations.
- Continue to be a member of SEDEX, and encourage all ingredients, packaging, bought-in-finished goods and relevant services suppliers to join SEDEX.
- Maintain a focus on Ethical Trading through our 'Enriching Life through Foods' Plan



- Continue to conduct routine Technical and full Ethical Compliance Audits
- We will increase focus on our supply chains, and ascertain the salient risks associated with these and work with our suppliers to mitigate any risks.
- Partner with external experts, academia and non-government organisations to further develop our knowledge in this space and ensure we are abreast of any changes in legislation and or best practices.
- Ensure our Procurement and HR teams receive training on their accountabilities under the Modern Slavery Act

## 7.2 Plans for FY25

- Launch and embed the new Premier Foods Human Rights policy internally with our colleagues but also externally with our suppliers and customers.
- Launch the FNET due diligence framework for identifying our salient risks and develop mitigation plans for the salient risks.
- Support the roll out of the new SEDEX Supplier Assurance Questionnaire (SAQ's) and embed the new SEDEX methodology and audits at our sites.
- Start to use SEDEX's RADAR tool to better understand the salient risks within our external supply chain.
- Review the Modern Slavery training we provide and upskill more relevant managers/colleagues in this space.
- To issue a Responsible Sourcing Handbook to suppliers during FY25.
- We will have representatives join the FNET working parties on key areas such as responsible recruitment and human rights.

## 8. Key Performance Indicators (KPIs)

It is through our KPIs that we will monitor our progress against all activities in the Modern Slavery Statement. These are our proposed KPI's for FY25 which we will update against progress in our next statement:

Area	Objective	Target date
Stronger Together	Maintain all manufacturing sites are Stronger Together partners and have a minimum of 2 colleagues trained	FY25
Supplier SEDEX Registration	90% of our ingredients, packaging and bought-in-finished goods suppliers are SEDEX registered	FY25
Supplier Assurance Questionnaire (SAQs)	For all suppliers that are SEDEX registered, we will request and promote the completion of the updated Self-Assessment Questionnaire (SAQ) process within the SEDEX Platform	FY25
Supplier Non-conformances	All overdue critical supplier non-conformances are chased, and data assessed for any trends	FY25