



A Trading Division of
Staple Dairy Products Ltd

New Grove House, Murray Road, Orpington, Kent, BR5 3QY

MODERN SLAVERY POLICY

Staple Food Group (SFG) is a trading division of Staple Dairy Products Ltd, a UK-based business operating with a Company registration number 01881120.

Our policy is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that SFG has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SFG has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery occurring within our businesses or supply chain.

This policy also supports compliance with BRCGS Agents & Brokers Issue 3 requirements relating to ethical trading, supplier approval, and risk management.

Our Business

SFG's vision is to be a leading independent national supplier of chilled, ambient and frozen food products to the full spectrum of UK retailers, wholesalers, manufacturers and foodservice operators. As a privately-owned business, we focus on building long-term relationships and working in partnership with customers. SFG has over 50 years of experience in supplying food products to the retail, wholesale, food manufacturing and foodservice sectors.

Our Policies and Procedures

We operate a number of internal policies to ensure that we conduct business in an ethical and transparent manner. These include:

1. Recruitment Policy and Procedure

We operate a robust recruitment procedure, including conducting eligibility to work checks for all employees in the UK to safeguard against human trafficking or individuals being forced to work against their will.

2. Whistle Blowing Policy

We operate a whistle blowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

3. Business Ethics and Corporate Social Responsibility Policy

This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

Any concerns relating to modern slavery must be reported immediately to senior management. A formal investigation will be initiated, and corrective actions implemented where required.

Our Suppliers

SFG operates a supplier policy and maintains a supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. We update our suppliers regularly with all our policies as and when they are amended. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

As part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. For UK-based suppliers – they pay their employees at least the national minimum wage/national living wage (as appropriate).
4. For international suppliers – they pay their employees any prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light.

SFG conducts risk assessments of its supply chain, considering factors such as product category, country of origin, labour intensity, and supplier history. Higher-risk suppliers are subject to enhanced due diligence, including audits, additional documentation, or third-party verification. We review risk assessments annually or sooner if significant changes occur.

Training

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Modern Slavery Policy is included in our Employee Handbook.

We regularly conduct training for those with purchasing responsibilities so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. This training is also included in our induction program for all new employees.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain:

- If no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Via the completion of in-house/external audits by those with purchasing responsibilities.
- Through the level of communication and personal contact with the supply chain and their understanding of, and compliance with, our expectations.
- Completion and review of supplier risk assessments.
- Monitoring supplier non-conformance trends and corrective actions.

Approval for this Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes SFG's slavery and human trafficking statement for the financial year ending 31 March 2027. It has been approved by the Senior Leadership Team, who will review and update it annually.

Approved by Staple Food Group

C McNally

W. Witkowska-Gosz

Chris McNally – Managing Director

Wioleta Witkowska-Gosz – Head of Technical & Brand