



Modern Slavery and Human Trafficking Transparency Statement

Making every day taste

better

For the financial year ended 27 September 2024

Contents

1. Introduction	3
2. Our Business	4
2.1 What we do	4
2.2 Our purpose	4
2.3 Our supply chain	5
3. Our Policies and Governance	6
3.1 Policies	6
3.2 Governance	6
3.3 Employment standards	7
4. Assessing and Managing Risk	8
4.1 Human rights due diligence	8
4.2 Supply chain risk assessment	8
4.3 Our priority supply chain risks	9
4.4 Managing and mitigating risk	10
5. Training and Capacity Building	12
5.1 Training for colleagues working in our direct operations	12
5.2 Training for colleagues working with our global supply chains	13
5.3 Awareness raising with key stakeholders	13
6. Collaboration	14
7. Tracking Our Progress	16



1. Introduction

Human rights abuses continue to be of concern, both in global supply chains and in UK manufacturing, with the estimated number of people living in modern slavery having grown in recent years*. Greencore Group plc and each of its subsidiaries ('Greencore' or 'the Group') is committed to promoting ethical conduct, safeguarding worker well-being and rights, and effectively managing risks associated with labour practices and modern slavery in both our own operations and our global supply chain. We are determined to play our part in addressing modern slavery and we firmly advocate for transparency and collaboration to eliminate this heinous crime.

In last year's Modern Slavery and Human Trafficking Transparency Statement, we committed to playing our part in tackling modern slavery. We have met this commitment and continue to focus on human rights and the struggle against modern slavery and labour exploitation. We are determined to be transparent about the challenges that we face and know that we can only disrupt these crimes by working in partnership with other organisations in the food industry and our stakeholders, colleagues and suppliers.

Greencore falls within the reporting scope of the UK Modern Slavery Act 2015 ('the Act') and this statement for our financial year ending 27 September 2024 ('FY24') describes the actions we have taken in this period to ensure that modern slavery is not taking place in our operations and supply chains.

This statement is made in accordance with Section 54, Part 6 of the Act. It details each Greencore entity to which Section 54, Part 6, applies and the steps taken during the reporting period to ensure that modern slavery and human

trafficking are not taking place within Greencore or Greencore's supply chain.

The Greencore entities to which the Modern Slavery and Human Trafficking Transparency Statement for FY24 applies are:

- Greencore Food to Go Limited
- Greencore Grocery Limited
- Greencore Prepared Meals Limited

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 Board of Directors of each of the entities covered under the Act.

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Signed:



Dalton Philips
Group Chief Executive Officer



Guy Dullage
Group Chief People Officer
and Director of:

Greencore Food to Go Limited
Greencore Grocery Limited
Greencore Prepared Meals Limited

Date of approval: 26 November 2024



2. Our Business

2.1 What we do

We are a leading manufacturer and distributor of convenience foods in the UK, supplying all of the major supermarkets in the UK. We also supply convenience and travel retail outlets, discounters, coffee shops, food service and other retailers. We have strong market positions in a range of categories including sandwiches, salads, sushi, chilled snacking, chilled ready meals, chilled soups and sauces, chilled quiche, ambient sauces and pickles, and frozen Yorkshire Puddings. We employ approximately 13,300 colleagues across our operations, which consist of 16 manufacturing sites, 3 regional distribution centres and 14 transport hubs.

Our sustainability ambition '*Better Future Plan*' specifically includes the protection of human rights in our Direct Operations and Global Supply Chains.

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 accessed at www.greencore.com.

2.2 Our purpose

Our purpose, 'Making every day taste better', defines how we are working for a future where our people and our business thrive sustainably.

'The Greencore Way' describes who we are and how we will succeed. People are the single most important element of our organisation. By sharing and reflecting what makes us different - People at the Core, Great Food, Excellence, and Sustainability - our people will help us bring our purpose to life.

Our work to combat modern slavery and human trafficking demonstrates that we choose to protect people, both colleagues within Greencore and those who work in our supply chains. In turn, this work is part of our wider corporate purpose and features as a key component of our sustainability strategy.

For us, purpose, people and sustainability are interconnected.



2.3 Our supply chain

We have publicly stated our aspiration to source our priority ingredients from a sustainable and fair supply chain by 2030. This requires increasing transparency in our global supply chains, and we acknowledge that as transparency increases, so does the potential for detecting modern slavery and human trafficking. We use a range of approaches and tools to address these risks and describe them in this report.

Greencore is a food manufacturing business. The food that we manufacture and sell is made using ingredients sourced from approximately 300 suppliers around the world, although the majority of these suppliers are UK-based businesses. We work to build effective, fair and transparent supply chains and nurture long-term relationships with suppliers that help us achieve this aim.



3. Our Policies and Governance

3.1 Policies

Greencore is committed to honesty and integrity in the conduct of our business. The Greencore Code of Ethics and Business Conduct defines and describes the principles we rely on to carry out our activities, and is publicly available at www.greencore.com.

We are transparent about the standards that we work to and publish our commitments in the Greencore Human Rights Policy, which is also at www.greencore.com.

Greencore acknowledges that the ways in which we conduct business and manage our company affairs has the potential to impact our stakeholders directly and they have the right to expect high standards throughout.

We have maintained our commitment as a Group to implement the principles of the Ethical Trading Initiative Base Code, an internationally recognised code of labour practice.

3.2 Governance

We revisit our governance approach every year, making sure we have appropriate accountability and scrutiny of our efforts.

- Our Chief People Officer ('CPO') has accountability for our plan for Human Rights in our Direct Operations, and our Chief Commercial Officer ('CCO') has accountability for our plan for Human Rights in our Global Supply Chain. The Chief Executive Officer ('CEO') has responsibility for overall performance of the Group, which includes sustainability governance. Our Chief Operating Officer ('COO'), has executive accountability for the overall Sustainability Strategy, ensuring its day-to-day momentum, buy in and progress.
- Board focus on the agenda is via a formal sub-committee of the Board, namely the Sustainability Committee. The Sustainability Committee meets twice a year to review programme performance and ensure the agenda has the support to progress at the pace required.

- Our Sustainability Oversight Committee ('SOC') is comprised of leaders from key functions within the Group (such as Finance, Risk, Legal and Company Secretarial, Commercial and Technical). The SOC's purpose is to act as a cross-functional business advisory group to support the Head of Sustainability in the delivery of our *Better Future Plan*, including both our Human Rights agendas.
- At an operational and topic-specific level, we have six Sustainable Business Management Groups ('SBMGs'), chaired by senior leaders, that provide cross functional forums to develop and steer the implementation of our strategy at an operational level. Of the six SBMGs, the Ethics and Inclusion & Diversity SBMG focusses on Human Rights in our Direct Operations, while the Responsible Sourcing SBMG focusses on Human Rights in our Global Supply Chains. Prevention of Modern Slavery and Labour Exploitation is a key focus area for these groups.

- Delivery of our sustainability strategy is achieved through a plan ownership model, with plan owners in relevant functional roles in the business ensuring that the strategy is part of how we work every day. These include a Plan Owner focusing on Human Rights in our Direct Operations and a Plan Owner focusing on Human Rights in our Global Supply Chains.



3.3 Employment standards

The Greencore Human Rights Policy, available at www.greencore.com, is informed by the International Labour Organisation ('ILO') Declaration on Fundamental Principles and Rights at Work. Greencore is aligned to the principles of the Ethical Trading Initiative (ETI) Base Code:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

To support these standards, Greencore is an AB (Buyer/Supplier) member of the Supplier Ethical Data Exchange ('SEDEX'). Each manufacturing facility is registered with SEDEX and regularly updates the self-assessment questionnaire.

All manufacturing sites have regular independent ethical audits conducted by an external accredited audit company.

Agency and other labour

Agency colleagues perform an important role in our fast-paced food manufacturing businesses; however we recognise that due to the nature of agency work these colleagues are vulnerable to exploitation. Therefore, our employment standards are equally applied to labour providers with whom we contract to supply temporary workers. Labour providers must demonstrate a commitment to, and compliance with, the Greencore Human Rights Policy. In addition, we audit and monitor their compliance on a regular basis. We have continued to include other providers of people services

('Third Party Service Providers') to our business, such as catering and security providers who provide colleagues to our sites, within our monitoring activities. These suppliers have continued to undergo regular audits to ensure that the colleagues they provide to us are receiving the same protections as our direct and agency colleagues.

Logistics Function

In last year's modern slavery statement, we described how we planned to increase the human rights support that we provide to our logistics function. We successfully piloted this with our Distribution facility in Tamworth, undergoing a third-party ethical audit during FY24. Following this successful pilot we now have plans in place to continue to roll out the programme across the logistics estate.



4. Assessing and managing risk

4.1 Human Rights Due Diligence

During FY24 Greencore completed a review of our Human Rights Due Diligence ('HRDD') activities. This review has delivered a refreshed programme, aligned with the United Nations Guiding Principles on Business and Human Rights ('UNGP's').

This review has enabled us to evaluate where there are opportunities to improve our processes, building upon our existing activities to ensure that we are taking appropriate steps to identify and mitigate risks both in our Direct Operations and our Global Supply Chains.

As the resulting process improvements are implemented throughout FY25 we will continually evaluate their effectiveness and take opportunities to enhance our reporting and accountability.

4.2 Supply Chain Risk Assessment

During FY24, we have continued to apply the risk assessment approach to our supply chains that we have built over a number of years with our suppliers, customers and stakeholders. Our supply chains are complex, large, and international and we acknowledge that there may be the risk of modern slavery or human trafficking present within them.

We completed a risk assessment of our ingredient supply chain using the Food Network for Ethical Trade Human Rights Risk Assessment Tool. The tool is maintained by a collaborative group of retailers, suppliers and human rights experts. It uses data from sources including the U.S. Department of Labour, the Walk Free Foundation, and the International Trade Union

Confederation, to establish the human rights risk of ingredients based on their country of origin and known challenges within the product sector. We also use data from SEDEX and individual suppliers, along with industry insights and horizon scanning, to ensure the most accurate picture of the risk profile is presented. The purpose of the risk assessment is to identify those supply

chains with the greatest risks and thus steer our ongoing engagement plans where we can bring the most benefit and demonstrate effectiveness.



4.3 Our priority supply chain risks

The broad assessment process identified a number of areas for additional focus from a human rights perspective, including:

- Fresh produce
- Frozen produce
- Chicken
- Warm-water prawns
- Processed tomatoes
- Tuna
- Herbs & spices
- Rice

These category priority areas are then informed by detailed product level analysis which steers the engagement decisions that we make with our suppliers and help us identify the facilities and companies which require the most active support. The engagement programme is supported by our Plan owner for Human Rights in our Global Supply Chains and actions are reported to the Responsible Sourcing SBMG.



Logistics

Our Logistics network distributes a number of Third Party Factored Goods to our customers. During FY24 we have worked to increase our understanding of the sourcing of these goods and any areas of risk within them. This work will continue throughout FY25.



4.4 Managing and mitigating risk

External reporting: “Whistleblowing”

Greencore provide an independent, external reporting hotline (known as our *Speak Up* program), which is free, anonymous and confidential, whereby any individual in Greencore, or indeed any third party, can raise concerns in relation to employment standards, ethics or any other impropriety or area of concern. The contact details for the hotline are displayed in prominent areas throughout all of Greencore’s sites and on the Greencore intranet and website. During FY24 the materials used to promote the service have been updated and refreshed, using simplified language and a strong call to action ‘Speak Up’ with the aim of increasing colleague awareness and to further encourage its use.

The nature of the calls received by the external reporting hotline are monitored and concerns are investigated and reported upon to the Audit and Risk Committee of the Board on a regular basis.

Stronger Together

Greencore supports the “Stronger Together” campaign, which is a multistakeholder initiative aimed at reducing modern slavery. We are committed to building knowledge within our teams and members of many Greencore teams and functions in the UK have attended Stronger Together training sessions. We want to increase our understanding of the nature of hidden labour exploitation and prevent its occurrence within our Group. The resources provided by the Stronger Together campaign, including multilingual posters and leaflets, are displayed throughout our Greencore sites and are accessible from colleague-facing systems, such as our “My Core Benefits” rewards platform.

Supplier Management

Greencore works with suppliers to build effective and transparent supply chains. We are reliant on our suppliers for the ingredients and services we use to create great food. We have a rigorous

supplier approval process, operated by Purchasing and Technical functions, with input from the Human Rights team.

During FY24, we have undertaken a comprehensive review of policies informing our supplier management processes – the Supplier Code of Conduct, Responsible Sourcing Manual and Human Rights Policy. The updated policies will launch in early FY25 and will provide clearer expectations of our suppliers in meeting the standards we require to deliver effective Human Rights Due Diligence.

The Greencore Standard Terms and Conditions of Purchase contain a number of specific provisions surrounding our expectations of suppliers in the context of the prevention of slavery and human trafficking. Specifically, suppliers are under an obligation:

- (i) not to engage in practices that amount to slavery, servitude, forced labour or human trafficking;

- (ii) to comply with applicable slavery laws; and
- (iii) to provide information to enable Greencore to include meaningful information in its Slavery and Human Trafficking Transparency Statement.

We require all tier 1 ingredient and packaging suppliers to be connected to Greencore on SEDEX and we continue to bring suppliers at tier 2 and beyond into the scheme; progressively increasing visibility across our supply base.

Action in high-risk supply chains:

During FY24, Greencore have been actively involved in the mitigation of risks in our supply chains, identified by our risk assessment process or other means. This work has included:

- Work with fresh produce suppliers in the UK to address labour practices, especially within those suppliers using the Seasonal Worker visa scheme.

Action in high risk supply chains (cont'd)

- Supporting a UK animal protein supplier who had identified an issue with recruitment fees paid by migrant workers
- Continued active engagement with our poultry supply chains from Thailand, with regular meetings with key suppliers and greater engagement with an in-country NGO to understand the specific challenges faced by workers in this region.

We continue to consider agency labour as a part of our business operation which may have a risk of slavery and human trafficking occurring. We therefore prioritise audits of agency labour providers, carried out by our Technical and local HR teams and conducted on a rolling basis through the year. We also continue to conduct deep-dive human rights due diligence on potential new agency labour providers prior to entering contractual relationships.

The approval process for new labour providers is multi-staged and includes a comprehensive background check by our Human Rights team and a detailed audit

by our Technical Supplier Approval team, which contains specific requirements around the prevention of modern slavery or other labour exploitation.

Collaboration is key in disrupting exploitation and Greencore work closely with our labour provider partners to share best practice for worker welfare and approaches for addressing modern slavery or labour exploitation risks.



5. Training and Capacity Building

5.1 Training for colleagues working in our direct operations

Greencore supports the Stronger Together campaign and each manufacturing site is expected to maintain the Stronger Together Business Partner commitment. As part of this commitment, colleagues from our site Human Resources ('HR') teams receive external, expert training on the identification of potential labour exploitation and best practice in responding to these indicators.

HR and Talent Acquisition teams in Greencore are provided with the knowledge and resources required to conduct checks on "Right to Work" compliance. HR colleagues also maintain competency in management of the SEDEX system, managing and leading ethical audits and closing out non-conformances.

We continue to evolve our processes around eligibility to work and identity, and have strengthened our approach

to reduce the potential risk of imposter switching or use of fraudulent documents when onboarding new colleagues. During FY24 our new HR Management system has gone live, which includes additional automated checks on candidate identity.

Training on hidden labour exploitation is included in our induction that is delivered to every new starter, and has been refreshed during FY24 to strengthen the information that we provide to new colleagues.

During FY24 we have reviewed our internal audit programme and identified opportunities to provide targeted training on improved internal auditing and conducting worker interviews. This training will take place during FY25.



5.2 Training for colleagues working with our Global Supply Chains

During FY24 we identified additional opportunities for Procurement and Technical colleagues working with our supply chains to engage suppliers in conversations around human rights risk, when visiting sites across the world. This has enabled us to increase our capacity to engage with suppliers on the importance of responsible human rights practices as part of the way we do business.

To build upon this opportunity, we have commissioned bespoke external training through Stronger Together to provide these colleagues with the skills and knowledge to identify potential human rights risks and harms during these visits.

This training will take place during the first quarter of FY25.

5.3 Awareness raising with key stakeholders

As part of the review of our HRDD activities we have identified opportunities to increase awareness and knowledge of modern slavery challenges with key groups of colleagues in our business.

During FY24 we have engaged our Ethics and Inclusion & Diversity SBMG with help from an external consultancy specialising in Lived Experience of survivors of modern slavery. This unique

insight is incredibly valuable and we plan to deliver further sessions to other stakeholder groups during FY25.

We have delivered an awareness raising session at a group Development Day for our HR teams, helping them to understand the key role they play in identifying potential instances of modern slavery in their interactions with colleagues.



6. Collaboration

In an environment where the challenges are complex and often hidden, and exploiters continually evolve their methods and tactics, collaboration is key to driving improvements in the fight against Modern Slavery. Collaborating with peers, customers, suppliers and industry experts to share intelligence, pool learnings and drive best practice is an essential part of our approach to tackling labour exploitation.

Greencore continues to work with other businesses and stakeholders and maintains links with the Gangmasters and Labour Abuse Authority ('GLAA'), relevant Police teams, the Association of Labour Providers ('ALP') and Stronger Together.

Some specific collaborative programmes we are involved with include:

Food Network for Ethical Trade

Greencore is a member of the Food Network for Ethical Trade ('FNET'). FNET is an initiative aiming to use the collective leverage of suppliers and retailers to bring about positive change in global food supply chains working conditions by providing

guidance, resources, training and opportunities for collaboration.

Our active membership of FNET enables us to collaborate with industry experts to drive best practice and keep up to date with the challenges in this fast-changing environment.

Greencore continue to be involved in a number of working groups within the network.

Modern Slavery Intelligence Network

The Modern Slavery Intelligence Network ('MSIN') is a pioneering nonprofit collaboration in the UK food and agriculture sector, created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation. MSIN provides a secure platform for sharing modern slavery data safely and appropriately with wide-ranging stakeholders.

The MSIN members are working together to ensure, so far as possible, that robust mechanisms are in place to safeguard those who may be impacted by modern slavery and/or worker exploitation and their data. This has required

a significant commitment from all members involved and engagement with several internal functions within the members' organisations including human rights, ethical trading, legal, data protection, privacy and IT security.

Greencore have continued to actively support the initiative throughout FY24. We see such collaborative programmes as a key resource available to us to actively disrupt Modern Slavery and exploitation.



Issara Institute

Issara Institute is an independent NGO based in South East Asia, tackling issues of human trafficking and forced labour through worker voice, partnership, and innovation.

Greencore remained a Strategic Partner during FY24, giving us access to on the ground worker voice information and detailed insights to challenges facing workers in regions where some of our high-risk ingredient supply chains operate.

Seafood Ethics Action Alliance

The Seafood Ethics Action Alliance (SEA Alliance) is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain, and ensure respect for human rights.

Greencore maintained membership during FY24 and has benefitted from access to greater insight into the human rights challenges in the global seafood sector, which is one of our high-risk ingredient sectors.



Bright Future

We are proud to be a business partner of the Bright Future Co-operative, a national initiative that aims to fast-track survivors of modern slavery into high quality employment. We joined Bright Future in 2021, and have so far placed five individuals into our business on a trial basis, with all five becoming permanent Greencore colleagues. This strong social value initiative helps to diversify our workforce, promote social mobility and tap into resilient and motivated talent. During FY24 we have promoted this initiative to our HR colleagues with the objective of identifying further opportunities for sites to engage in the programme.



7. Tracking Our Progress

We cannot tackle labour exploitation, modern slavery and human trafficking without being transparent about the challenges that we encounter. We also want to share areas of progress and improvement. This applies to both our own activities as an employer and food manufacturer and to the activities of our suppliers.

As in previous years, we continued to focus on collaborative projects, as described in section 6, alongside detailed supply chain risk analysis and transparency. We track progress through a number of metrics and believe that they help demonstrate the effectiveness of our actions to ensure that slavery and human trafficking is not taking place in our business. The objectives measured against each KPI are set out on page 17.

Commitments

Our ongoing commitments are below:



We will report on our actions - our successes and failures - in a simple and transparent way each year.



Our successful cross-disciplinary approach, that engages colleagues in Technical, HR, Operations and Purchasing functions will continue to be supported and developed.



We will increase focus on our global supply chains, understanding the realities of complex multi-tier and multinational supply from an ethical perspective.



We will play a leading role in collaborative programmes that tackle wider ethical challenges as well as specific Modern Slavery risks.



We will build partnerships with external experts, academia and non-governmental organisations to inform our ethical practices and help address modern slavery, human trafficking, worker abuse and exploitation.



We will continue to support the survivors of modern slavery and human trafficking.

Plans for FY25

- Increase our capacity for risk identification and management across our Direct Operations through the delivery of improved training on internal audit and worker interviews.
- Continue with the rollout of enhanced human rights due diligence across our logistics function, building upon the successful pilot work during FY24
- Increase engagement with suppliers of high-risk ingredients, informed by our risk assessment and benefitting from the additional insights we will gather from supplier-facing colleagues having undergone specialist training.
- Continue to increase our understanding of risk within the supply chains of the Third Party Factored Goods distributed by our logistics network.



Key Performance Indicators

Throughout this statement, we reference KPIs as our way of demonstrating transparency and the drive for improvement. We believe that these KPIs are the most appropriate measures of our activity.

Area	Objective	Target end Sept 2024	Achieved end Sept 2024	Commentary
Supplier SEDEX Registration	Tier 1 Raw material and packaging suppliers are SEDEX registered	99%	97%	Sedex registration is mandatory for new suppliers. Target achievement can be impacted by short term lapses in membership at the time of reporting.
Stronger Together	All sites* have achieved Stronger Together Business Partner status	100%	100%	
Independent Ethical Audit	All sites have undergone a third-party ethical audit within the last 2 years	100%	100%	
Audit Non-Conformance closeout	All sites have closed out any audit non-conformances** during the reporting period	100%	93%	One site has an outstanding non-conformance from their audit. The close out of this non-conformance requires some mechanical improvements to the site, which are in progress as part of a larger infrastructure project. We expect to be able to close out the non-conformance in the first quarter of FY25 following the completion of these improvements. Mitigation measures are in place whilst this work is completed.

Greencore 

www.greencore.com

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Making every day taste *better*