

MODERN SLAVERY STATEMENT



Issued October 2026

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. This update provides an overview of how we continue to reduce the risk of modern slavery in our business. 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. The update can be found on the Avara Foods homepage – www.avarafoods.co.uk.

ORGANISATIONAL BACKGROUND

Avara Foods Ltd is one of the largest UK food businesses, supplying major supermarkets and popular restaurants. We manage an extensive supply chain which includes poultry farming, processing, and distribution, with a team of over 5,700 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: being Inclusive, Ambitious, Excelling and operating with 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 1 June 2025 to 31 May 2026.



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 that helps 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

UPDATED: 2026

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.

We have continued to operate within our established governance and policy framework. No new modern slavery-related policies were launched during the year; however, our existing policies continued to set clear expectations for how we prevent and respond to potential exploitation risks across our business and supply chain. These include our Human Rights Policy, Anti-Exploitation Policy, Employee Code of Conduct, Supplier Code of Conduct, Child Remediation Policy, recruitment policies and Whistleblowing Policy. Responsibility remains with the Executive Board, with day-to-day oversight led through HR, Sustainability, Procurement and relevant business teams.

SECTION 1: RISK ASSESSMENT AND MITIGATION

UNDERSTANDING AND MITIGATING THE RISK OF MODERN SLAVERY

In FY26, we maintained our existing approach to managing labour-related modern slavery risk. We recognise that the greatest potential risk areas remain the use of temporary and agency labour, labour providers, recruitment practices and parts of our extended supply chain where visibility may be more limited. We continued to prioritise direct recruitment where possible, carefully manage the use of approved agency labour, and work closely with our agency partners to maintain oversight of labour standards and worker welfare. During the reporting period, our average temporary agency usage reduced to 11.7%, compared with 13% in the previous reporting year. While there is no legal requirement to limit agency assignments to a specific period, we recognise that unnecessary long-term reliance on agency labour can increase risk. We therefore aim to support movement into permanent roles where appropriate, while recognising that this is not always possible due to operational requirements and individual colleague preferences.

We also continued to engage with external partners and industry bodies through our continued membership of FNET and the Association of Labour Providers, and as a Stronger Together Business Partner. We encouraged our recruitment partners to use recognised tools such as the Responsible Recruitment Toolkit. These activities, alongside our agency audits and review processes, support our ongoing risk mitigation and help strengthen awareness of labour exploitation risks across the business. Performance and outcomes from these activities are monitored through our governance processes and KPI reporting.

CHANNELS FOR THE WORKER VOICE

In FY26, we continued to maintain a range of worker voice channels, including Regional Colleague Councils, local forums, listening groups, line manager conversations, HR support and our independent whistleblowing service. These channels help colleagues and agency workers raise concerns, access support and provide feedback in a way that is accessible across our sites. We continue to review these routes to ensure they remain clear, inclusive and effective.

UPDATED: 2026

SECTION 2: DUE DILIGENCE

SUPPLY CHAIN ENGAGEMENT

We continued to use Sedex and our supplier risk assessment processes to support visibility of labour standards and ethical trade risks across relevant areas of our supply chain, with a particular focus on ingredients and packaging. During FY26, we had 228 suppliers on the Sedex platform, enabling us to review supplier self-assessments, audit information and risk indicators. Our Oracle system also supports supplier oversight by providing enhanced data for pre-qualification, ongoing management and supplier communication. Where further information or action is required, this is followed up through supplier management and relevant business processes. We also continue to engage with relevant industry groups, including FNET, to understand emerging best practice on responsible purchasing and ethical trade. As this work develops, we will consider any relevant actions through our internal governance processes. Looking ahead to FY27, we will review our supplier audit process, supplier contract requirements and the technology available to support more consistent oversight, follow-up and reporting across our supply chain.

WHISTLEBLOWING SERVICE

The whistleblowing service remained available throughout FY26 to colleagues, agency workers and third-party partners. Any concerns raised are reviewed through the appropriate process, with escalation where there is a potential link to labour standards, exploitation or worker welfare. During FY26, no confirmed modern slavery concerns were identified through the whistleblowing process.

SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct remains a key part of our supplier approval and management process, setting clear expectations on ethical practice, labour standards and compliance with our values. Relevant business teams, including Procurement and Sustainability, continue to support the application of these expectations through supplier onboarding, review and ongoing engagement. Following the reporting period, the Supplier Code of Conduct was reviewed and updated, and we will continue to ensure it supports our expectations on ethical practice, labour standards and responsible business conduct.

AUDITS AND REVIEWS

Audits and reviews remained central to our assurance approach during FY26. This included SMETA audits, site self-assessment activity, internal compliance checks, worker interviews, agency audits and agriculture site reviews. Findings are used to identify risk, track corrective actions and strengthen controls across our operational and supply chain environments. Performance and outcomes from these activities are monitored through our governance processes and KPI reporting.

SECTION 3: TRAINING, AWARENESS, MONITORING AND EVALUATION

TRAINING AND AWARENESS

During FY26, we continued to deliver modern slavery training and awareness activity. We also reviewed and updated the training content and delivery approach, with the revised programme in the process of being rolled out.

MONITORING AND EVALUATION

We measure effectiveness through governance reviews, audit outcomes, training completion, worker voice data, whistleblowing information and the investigation of any potential concerns. Where issues are identified, our priority remains to protect individuals, manage cases confidentially and work with relevant partners or authorities where appropriate. Performance against our key measures is reviewed through our governance processes and reported annually through this statement.

SECTION 4: NEXT STEPS

TRACKING OUR EFFECTIVENESS

During FY27, we will continue to build on our existing controls by reviewing performance against our KPIs, strengthening visibility of higher-risk suppliers and labour providers, improving colleague engagement and worker voice mechanisms, and continuing collaboration with FNET, ALP and Stronger Together. We will also review the effectiveness of our due diligence, audit and training programmes, alongside our supplier audit approach, supplier contract requirements and the technology available to support supplier oversight, reporting and follow-up.

These KPIs are intended to help us measure whether our controls are operating as expected, improve visibility of risk, and identify areas where further action may be needed. They focus on governance, labour standards, supplier oversight, training and worker voice, and support ongoing monitoring and continuous improvement.

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

Focus Area	Key Indicator	FY26 Result	FY27 Target
Governance	HR & Ethics Steering Group reviews completed	4	Minimum 4
Labour Providers	Approved labour agencies audited	100%	100%
Supplier Oversight	Higher-risk suppliers reviewed through Sedex and/or supplier risk assessment processes.	KPI reset to focus on higher-risk suppliers. Work progressed to identify this group and streamline the supplier review approach; further time is needed to assess performance against the revised measure.	≥90% of identified higher-risk suppliers reviewed

Training	Completion of relevant modern slavery awareness training	Training and awareness activity delivered; revised training reviewed and updated, with rollout in progress.	≥90% completion of relevant modern slavery awareness training
Effectiveness	Confirmed modern slavery incidents within Avara operations	0	0
Supplier Oversight	Review of supplier audit process, contract requirements and supporting technology completed	In progress	Complete

Note: The supplier oversight KPI has been refined for FY26/27 to focus on identified higher-risk suppliers, providing a more meaningful risk-based measure than applying a single questionnaire requirement across the full supplier base. As the measure differs from the original FY25/26 KPI, the results are not directly comparable.

This statement has been approved by the Board of Directors of Avara Foods Ltd on 8th October 2026 and signed on its behalf by



Chris Hall
Chief Executive Officer
Date: 08/10/2026