Introduction

At Kestrel Foods, we care about how our food is made and how the people behind it are treated. That responsibility extends from our team in Northern Ireland to the people who grow, harvest and process the ingredients we source around the world.

We do not tolerate slavery, human trafficking, forced labour or debt bondage in our business or supply chains. We also prohibit unlawful child labour. We recognise that identifying exploitation requires ongoing attention, particularly where supply chains extend across different countries and several stages of production.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It describes the steps taken by Kestrel Foods Ltd during the **financial year ended 30 April 2026** to address modern slavery and human trafficking risks in our business and supply chains.

This is Kestrel Foods Ltd's first published modern slavery statement. We are at an early stage of formalising our approach to identifying and addressing modern slavery risks, building on our existing employment and supplier approval procedures.

Our Business

Kestrel Foods Ltd. is a privately owned food manufacturer headquartered in County Armagh, Northern Ireland. Established in 1996, the company has grown from a small family-run operation into an internationally recognised premium snacking business, employing almost 150 people and supplying products to more than 30 markets worldwide.

The business operates a portfolio of consumer brands including Forest Feast, ACTI-SNACK, Just Live a Little and Indie Bay, alongside selected private-label products. The company's activities span sourcing, production, packing, sales and marketing, with manufacturing capabilities including roasted nuts, trail mixes, chocolate-coated fruits and nuts, and granola.

Kestrel Foods Ltd. sources nuts, dried fruits, cocoa, chocolate and other ingredients through a global supplier network spanning Europe, Asia, Africa and South America. The company works closely with suppliers and recognised certification programmes to support responsible sourcing and greater transparency throughout its supply chain.

Our workforce consists of permanent employees, temporary workers and agency workers where required to meet operational demands.

Our Supply Chain

We source nuts, dried fruits, cocoa, chocolate and other ingredients through a global supplier network. Our supply chain also includes packaging, cleaning and hygiene services, logistics and transport, recruitment and labour providers, maintenance and engineering contractors, and media and marketing agencies.

Policies on Modern Slavery

Our approach is supported by policies and procedures covering employment practices, supplier standards and the reporting of concerns.

- Modern Slavery Policy
- Human Rights Policy
- Ethical Trading Policy
- Responsible Sourcing Policy
- Remediation Policy

- Whistleblowing Policy
- Recruitment Policy (including right to work)
- Equal Opportunities Policy

Due Diligence

Our raw material, packaging and indirect suppliers go through an approval process prior to commencement of supply. Our supplier approval procedures include questionnaires, review of available audit findings and further checks where appropriate to the nature and risk of the supply.

As an audited member of SEDEX this supports our understanding of labour practices, human rights, environmental standards and business ethics within our supply chain. We review relevant supplier information and available SMETA audit reports, follow up concerns and monitor agreed improvements.

Our approach takes account of the ingredient or service supplied, its origin and the way it is produced, including any subcontracted activities. Where risks require closer scrutiny, we seek further information or set additional conditions of supply. Where a supplier refuses to cooperate or serious concerns remain unresolved, we will consider declining, suspending or ending the relationship in line with our contractual rights, taking account of the safety and welfare of affected workers.

Our commitment to responsible cocoa sourcing is reflected in our choice of Cacao-Trace chocolate. The programme rewards cocoa farmers through quality premiums and a Chocolate Bonus, which is returned to farming communities through indirect payments and community projects. By choosing Cacao-Trace, we support better incomes and stronger communities for the people behind our chocolate.

Our own operations are reviewed through relevant customer requirements, independent audits and internal checks. Where ethical and labour standards form part of these reviews, we use the findings to identify improvements, agree corrective actions and follow up progress.

Risk Assessment

Our primary risk areas include agency worker recruitment, labour-intensive supply chains and service providers operating on-site. Our understanding of these risks continues to develop.

Whistleblowing

Employees, agency workers, suppliers and other stakeholders are encouraged to raise concerns about modern slavery or human trafficking with a line manager, the HR Manager or a Director, or through our whistleblowing procedure. Concerns can also be reported directly to the police or the UK Modern Slavery & Exploitation Helpline, without company permission.

Reports will be assessed promptly and handled sensitively, with information shared only where necessary. Our response will prioritise the safety and welfare of affected workers. Anyone implicated in a concern will not lead the response, and no individual will suffer detrimental treatment for raising a genuine concern, even if no wrongdoing is subsequently found.

Training and Awareness

We promote awareness of modern slavery through senior management briefings and training where appropriate. Employees are encouraged to raise concerns without fear of retaliation.

Measuring Effectiveness

We monitor our effectiveness through:

- Supplier onboarding & compliance reviews
- Ethical trade audits (e.g. SMETA)
- Verification of labour providers
- Number of reported concerns & outcomes
- Number of employees trained in modern slavery

Actions Taken During this Year

During this financial year (to End April 2026), we have completed the following actions:

- Created a Modern Slavery Policy
- Created a responsible sourcing policy
- Created a modern slavery remediation policy
- Delivered training to procurement, senior management & HR teams
- Continued to risk assess current and new suppliers

Future Commitments

Kestrel Foods Ltd remains committed to combating modern slavery and human trafficking and will continue to strengthen our policies, procedures and supply chain oversight. For the financial year ending 30 April 2027 we plan to:

- Communicate the Modern Slavery Policy and reporting routes to relevant staff.
- Review available ethical information for suppliers identified as higher risk, using Sedex where relevant.
- Review progress when preparing the next annual statement

This statement has been approved by the Board of Directors and will be reviewed annually.



Michael Hall

CEO, Kestrel Foods Ltd.

31/10/26