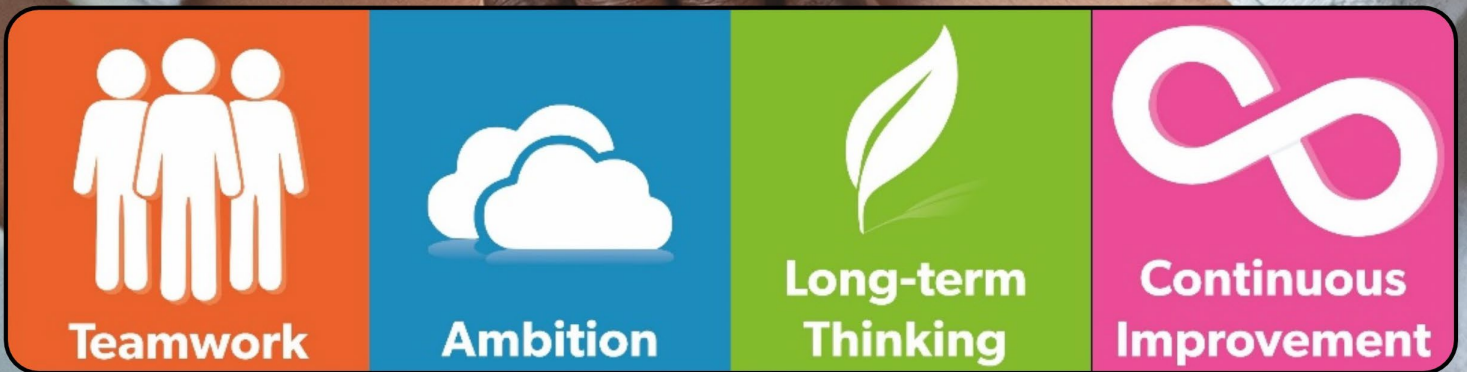




Kavli UK Modern Slavery Statement

2026



PROFITS FROM THE KAVLI GROUP GO TO GOOD CAUSES

Kavli UK Modern Slavery Statement 2026

Financial year ended 31 December 2025

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Section 1: Introduction, Scope and Reporting Period

This is Kavli UK's eighth Modern Slavery Statement. It is made under section 54(1) of the Modern Slavery Act 2015 and describes the steps taken by the Kavli Group during the financial year ended 31 December 2025 to prevent slavery and human trafficking in its operations and supply chains. This is a group statement made on behalf of Kavli UK Limited, Primula Limited, Castle MacLellan Foods Limited and Kavli Investments Limited. The statement is reviewed by the Kavli Leadership Team and approved and signed by the Managing Director on behalf of Kavli UK.

Kavli UK is committed to respecting human rights and treating people fairly. We recognise that modern slavery can occur through forced or compulsory labour, servitude, human trafficking, debt bondage, child labour and other forms of exploitation. We take a zero-tolerance approach to such practices and continue to review and improve our controls.

During 2025, our principal areas of focus were agency labour, supplier risk assessment, ethical auditing, colleague awareness and improved supply chain mapping. This statement covers Kavli UK's operations at Gateshead and Kirkcudbright and the supply chains supporting those operations.

Section 2: Our Organisation, Operations and Supply Chains

Kavli UK is part of the Kavli Group, which has operated in international markets for more than 100 years. Kavli products are present in more than 20 countries.

Kavli's Primula Cheese brand was first sold in the UK in 1929. The first UK factory opened near Newcastle-upon-Tyne in 1936, and the UK business is now based at Team Valley in Gateshead. In 1997, Kavli UK acquired the Castle MacLellan pâté business in Kirkcudbright, south-west Scotland.

Kavli UK employs around 280 people across its two sites. We manufacture cheese spreads, snacks and dips under the Primula brand; chilled pâté and cheese bakes under the Castle MacLellan brand; private-label products for UK supermarkets; and Kavli-branded whipped cheese.

In 2025, the UK group purchased approximately £24 million of raw materials, packaging, goods and services from more than 200 suppliers. Forty suppliers represented approximately 70% of total procurement costs. Important purchase categories include dairy, other food ingredients and packaging, and most suppliers are based in the UK and Europe. We also use labour providers to supply part of our workforce throughout the year. Annual spend with agency labour suppliers was approximately £0.4 million.

Section 3: Governance and Accountability

The Managing Director has overall accountability for Kavli UK's approach to modern slavery and approves and signs this statement following review by the Kavli Leadership Team. The Kavli Leadership Team is the UK-level leadership team and oversees operational delivery. A cross-functional Modern Slavery Working Group supports delivery of the programme and meets every six months to review risks, KPI performance, reported concerns and agreed actions. Material issues are escalated to the Kavli Leadership Team and the Managing Director as appropriate.

Relevant responsibilities are shared across Procurement, Human Resources, Sales, New Product Development, Finance and site leadership. These functions support supplier onboarding, labour provider oversight, training, worker communication, payroll, risk assessment and escalation of concerns.

Section 4: Policies and Contractual Standards

Our approach is supported by the following policies:

- Ethical Trading Policy;
- Human Rights Policy;
- Dignity at Work Policy; and
- Whistleblowing Policy.

As our programme develops, we will review these policies and due diligence processes against recognised principles, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the International Labour Organization's fundamental principles and rights at work.

Our Ethical Trading Policy reflects applicable UK legislation and the principle that employment must be freely chosen. It includes payment of at least the applicable statutory minimum wage, observance of working time requirements, and a commitment that no colleague should experience inhumane or harsh treatment.

Our Dignity at Work Policy sets expectations for respectful treatment and prohibits harassment and bullying by colleagues or external parties such as customers and suppliers. Our Whistleblowing Policy provides a confidential route for colleagues to report suspected misconduct or risks to an individual's life or health.

Suppliers are issued with our Ethical Trading Policy and Modern Slavery Statement so that our standards and expectations are clear. New suppliers complete a Supplier Assessment Questionnaire and specification as part of onboarding. These documents are refreshed at least every three years.

Section 5: Modern Slavery Risk Assessment

We assess modern slavery risk by considering the nature of the goods or services supplied, the workforce model, sourcing location, available supplier information and the strength of relevant controls. Annual spend helps us prioritise review activity, but it is not treated as a measure of modern slavery risk by itself.

Agency labour is treated as a higher-risk category regardless of spend because temporary and migrant workers may be more vulnerable to exploitation. Other areas requiring attention include labour-intensive production, agriculture and food ingredients, packaging, logistics, subcontracting and operations in locations with higher recognised labour-rights risks.

Priority suppliers are selected using country and regional risk, commodity and sector risk, labour intensity, reliance on temporary or migrant labour, recruitment practices, subcontracting, Sedex information, previous audit findings, business criticality and other available evidence. Spend may help prioritise activity but is not used as a standalone indicator of modern slavery risk.

For priority suppliers, we are developing more detailed supply chain mapping covering the supplier's location, operating country, category, workforce risk factors, checks undertaken, available Sedex information and, where applicable, the supplier's modern slavery statement. Suppliers rated high risk will have a documented follow-up plan.

Risk area	Potential vulnerability	Current or planned control
Agency labour	Temporary and migrant workers may be exposed to recruitment fees, coercion, document retention or unclear deductions.	GLAA checks where applicable, provider audits, worker communications, confidential reporting and strengthened responsible recruitment checks.
Dairy, agricultural and other food ingredients	Seasonal labour, lower-tier sourcing and limited visibility may increase risk.	Supplier assessment, Sedex information, risk-based mapping and follow-up evidence.
Imported ingredients	Country, commodity and recruitment risks may arise below the direct supplier.	Country and commodity review, supplier engagement, and escalation where information is incomplete or concerning.
Packaging	Labour-intensive production and overseas sourcing may create lower-tier risks.	Supplier questionnaires, Sedex data where available, contractual review and corrective-action monitoring.

Section 6: Due Diligence in Our Operations

Kavli UK maintains links with Sedex, the Gangmasters and Labour Abuse Authority (GLAA) and Stronger Together to help us understand modern slavery indicators and improve our controls.

We require labour providers operating within the GLAA-regulated sector to hold a valid GLAA licence and to comply with the Gangmasters (Licensing) Act 2004 and associated standards. Our checks cover fair working hours, appropriate training, statutory minimum pay, transport, health and safety, and workers' terms and conditions. Current labour providers are subject to audit checks, and new providers are audited before engagement.

In 2025, a two-day SMETA Version 7 ethical audit was completed at the Castle MacLellan Foods Limited site by Verner Wheelock, incorporating KSSA. The audit identified areas of good practice and opportunities for continuous improvement. Actions arising from ethical audits are monitored through the relevant business functions.

Section 7: Supplier and Labour Provider Due Diligence

Supplier due diligence begins during onboarding and is refreshed periodically. It includes completion and approval of the Supplier Assessment Questionnaire and specification, communication of our ethical requirements, and further review where the supplier's category, location, workforce model or responses indicate higher risk.

Kavli UK is a Sedex member. Where relevant, Sedex information and independent ethical audit results are used to support our understanding of supplier controls and areas requiring follow-up. We encourage suppliers to register with Sedex to improve visibility across the supply chain.

Where a concern is identified, our response will be proportionate to the severity and immediacy of the risk. We may request additional evidence, agree and monitor corrective actions, commission further review, escalate the issue internally or to the appropriate authority, suspend new activity, or end a relationship where improvement is not possible. Decisions will take account of the potential effect on affected workers and will prioritise their safety and welfare.

Section 8: Raising Concerns and Remediation

Colleagues are encouraged to report any indicator or suspected instance of modern slavery. Available routes include line management, Human Resources, our confidential Whistle B website, the Stronger Together hotline and the dedicated mailbox at ukslaveryconcern@kavli.co.uk.

Concerns are assessed promptly and handled as confidentially as possible. Kavli UK does not tolerate retaliation against anyone raising a concern in good faith. Where there is an immediate risk to a worker, protecting the individual is the first priority. Matters may be escalated to senior management, the GLAA, the police or another competent authority as appropriate.

Where harm is identified, Kavli UK will seek a victim-centred response. This may include working with the labour provider or supplier on corrective action, supporting access to specialist assistance, protecting confidentiality, preserving employment where appropriate and monitoring actions to reduce the risk of recurrence. Ending a relationship will not be treated as the only response where doing so could create further harm for workers.

Section 9: Training and Worker Awareness

Members of the Kavli UK Leadership Team, Human Resources team and Modern Slavery Working Group have completed Stronger Together training, and the Stronger Together programme is used across our UK sites. Modern slavery awareness forms part of induction, supported by training materials, posters and periodic staff communications.

Modern slavery e-learning is available to all colleagues, covering common indicators and routes for reporting concerns. Completion will be monitored, with periodic updates provided to colleagues in supplier-facing roles. An E-learning

video was included in our internal “Learning Week” in 2025 and will form part of our awareness activity going forward. Agency workers are included in awareness activity and may use the available reporting channels.

Section 10: Effectiveness and 2025 Performance

During the reporting period, Kavli UK did not receive any human-rights-related grievances concerning its operations or supply chain and was not made aware of any confirmed incidents of forced labour, compulsory labour or child labour. This conclusion is based on the reporting channels, audit activity and due diligence described in this statement; it does not remove the need for continued active monitoring.

Our effectiveness measures include:

Measure	2025 position	Planned improvement
Ethical audits	One two-day SMETA Version 7 audit completed at Castle MacLellan Foods Limited.	Continue independent ethical audits and report material themes and closure of corrective actions.
Grievances and confirmed cases	No human-rights-related grievances or confirmed instances of forced, compulsory or child labour were reported through the available channels.	Continue to promote reporting routes and monitor concerns and outcomes.
Labour providers	GLAA licence and audit checks form part of current and new provider controls.	Record the proportion of providers checked, findings raised and actions closed.
Training	Stronger Together Training completed by 100% of the Kavli UK Leadership Team, Human Resources team and Modern Slavery Working Group. Modern Slavery training incorporated into new starter induction programme. Refresher e-learning is available to all colleagues.	Measure and report completion rates for all colleagues and for higher-risk roles.
Supplier due diligence	Supplier questionnaires, specifications and policy communication form part of onboarding and periodic review.	Measure questionnaire completion, documented risk ratings, follow-up reviews and overdue actions.

Section 11: Progress Against Previous Commitments

Commitment	Progress	Next step
Increase colleague awareness and explain reporting routes.	Ongoing. Awareness materials and Stronger Together content are used across both sites.	Continue annual communications and retain evidence of delivery.
Provide modern slavery e-learning to all colleagues.	Ongoing. E-learning is available.	Monitor and report completion rates.
Create a dedicated reporting mailbox.	Complete, mailbox monitored through year.	Continue to publicise and monitor the mailbox.
Partner with Stronger Together and establish periodic governance review.	Complete and ongoing. The cross-functional group meets every six months. Decisions and actions are monitored.	Continue to monitor risks, actions and decisions.
Create and publish a Human Rights Policy.	Complete.	Keep the policy under review.

Improve Sedex participation and supply chain mapping.	Ongoing. The ESG Due Diligence Platform has been added to Sedex for implementation and rollout.	Complete rollout and document supplier risk ratings and follow-up.
Issue ethical requirements and the Modern Slavery Statement to suppliers.	Ongoing.	Maintain a record of issue and acknowledgement.

Section 12: Commitments for 2026

2026 commitment	Measurable KPI and target	Owner	Deadline / review frequency
Complete risk-based mapping of priority suppliers.	100% of priority suppliers to have a documented category, sourcing country, workforce risk profile, due diligence record and high, medium or low risk rating. 100% of suppliers rated high risk to have a documented follow-up plan.	Procurement	Complete by 31 December 2026; progress reviewed biannually.
Strengthen supplier due diligence and corrective-action monitoring.	100% of new suppliers to complete the Supplier Assessment Questionnaire before approval. At least 95% of corrective actions to be closed by the agreed due date, with all overdue high-risk actions escalated within 10 working days .	Procurement, supported by the relevant technical or site function	Monitored biannually throughout 2026.
Maintain effective labour provider controls.	100% of labour providers to have a valid GLAA licence where required and a current compliance review. 100% of new labour providers to be audited before engagement. All critical findings to be escalated immediately and subject to an agreed action plan within 10 working days .	Human Resources	Licence checks monitored throughout 2026; formal review at least annually.
Continue modern slavery training completion.	At least 95% of all employed colleagues to complete modern slavery awareness training by year-end, including 100% of Procurement, Human Resources, site leadership and the Modern Slavery Working Group. New starters to complete training within 30 days of joining, and colleagues absent at year-end to complete it within 30 days of returning.	Human Resources, with functional leaders responsible for completion in their teams	Complete by 31 December 2026; progress reviewed quarterly.
Continue independent ethical assurance.	Complete all ethical audits included in the approved 2026 audit plan. 100% of critical findings to be escalated immediately, and at least 95% of corrective actions to be closed by their agreed due dates.	Site leadership, supported by Human Resources and the relevant compliance function	In line with the 2026 audit plan; action status reviewed quarterly.
Improve worker awareness and access to reporting routes.	Deliver at least one documented modern slavery awareness communication at each UK site during 2026. Display reporting routes at both sites.	Human Resources, the Modern Slavery Working Group and site leadership	Complete by 31 December 2026; visibility checks undertaken every six months.
Strengthen UK and leadership oversight.	The Modern Slavery Working Group to meet at least twice during 2026, with actions, owners and due dates recorded. The Kavli Leadership Team and Managing Director to receive at least one annual update covering KPI performance, material risks, concerns and remediation activity.	Modern Slavery Working Group and Managing Director	Six-monthly Working Group review and annual Kavli Leadership Team and Managing Director update.

Section 13: Leadership Team Review, Managing Director Approval and Signature

This statement constitutes Kavli UK's Modern Slavery statement for the financial year ended 31 December 2025.

This statement was reviewed by the Kavli Leadership Team and approved by the Managing Director on 21st October 2026.

Following approval and signature, the statement will be linked prominently from the Kavli UK website homepage, submitted to the UK Government Modern Slavery Statement Registry and retained online alongside previous statements.

Mark Butel

Managing Director
Kavli UK Limited

Signature: _____

Date: 21st October 2026