

Modern Slavery Act 2015

Prinova Europe Limited

Slavery and human trafficking statement 2025-2026

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and outlines the steps taken by Prinova Europe Ltd and its subsidiaries during the fiscal year ending 31 March 2026 to prevent modern slavery and human trafficking in our business and supply chains. This statement is reviewed and updated annually.

Why do we need to talk about modern slavery?

Modern slavery remains one of the most pressing human rights challenges of our time, affecting over 50 million people globally, including 27.6 million trapped in forced labour according to the International Labour Organisation (ILO) ¹. This exploitation affects all industries and geographies, and unfortunately, the food sector is particularly vulnerable due to its reliance on seasonal, migrant, and low-paid labour. Unfortunately, complex food supply chains create blind spots where exploitation can persist undetected and unaddressed.

Prinova is part of a global distribution and manufacturing industry. We recognise our responsibility to ensure that our operations and supply chains are free from modern slavery and forced labour. This statement outlines the steps we are taking to identify, prevent, and address these risks, in line with our ethical commitments and legal obligations under the UK Modern Slavery Act 2015.

Our commitment to Human Rights is fundamental to how we operate at Prinova. This position is firmly embedded in our Business Code of Conduct, procedures, and policies as outline here. This statement sets out our actions to support our commitment to a business free from modern slavery.

About Prinova

Prinova is one of the world's largest distributors of functional ingredients and a provider of integrated solutions such as nutrient premixes and particle management services. The products we supply are used for the food, feed, personal care, pharmaceuticals, health supplements, and other related industries globally. The company is a subsidiary of Prinova Group, headquartered in the USA. Prinova group is part of the NAGASE Group, headquartered in Japan, since August 2019. You can learn more about us on our website at <https://www.prinovaglobal.com/eu/en/about>.

Prinova Europe head office is based in London (UK), and we have sales offices around the globe as well as a manufacturing facilities in Kent (UK)² and Brazil. From those entities we trade globally: within the EU and the UK, in the Southeast Pacific region, Turkey, Middle east, Mexico and certain regions of Africa.

Prinova Europe sources over 2,000 ingredients from over 600 manufacturers worldwide. Over 70% of our manufacturers are located in China and India. However, we also source products from the UK, USA, EU, as well as South America and Southeast Asia.

Prinova Europe relies on several 3rd party suppliers for processing, storing, and transporting products in the respective regions in which we trade.

¹ Statistics provided via the ILO [website](#)

² Prinova Europe Ltd (PEL) refers to our distribution business and all its subsidiaries throughout this statement. Prinova Solutions Europe Limited (PSEL) will refer solely to our manufacturing business based in Aylesford Kent, when appropriate to make the distinction. Unless specified, Prinova Europe will refer to both PEL and PSEL businesses throughout this statement.

Our responsibilities

Our commitments

Prinova's vision is to create a healthier, more nutritious world. We believe that no one should be exploited to make the products we supply. Respect for human rights, and for the freedom and dignity of every worker in our supply chain, is part of what we mean by a healthier, more nutritious world.

Prinova has a zero-tolerance approach to modern slavery. By this we mean that we do not accept forced, bonded or child labour anywhere in our business or supply chain, and that any breach we identify will result in immediate corrective action and, where a supplier is unwilling or unable to remediate issues, termination of the relationship.

On an annual basis, the Senior Leadership Team (SLT) reviews the modern slavery and human trafficking statement content and agrees a plan of action to ensure that a robust risk management process is in place to remove the risk of forced labour within Prinova's activities. This is an integral part of our sustainability strategy.

Our policies

Prinova Europe has developed several policies and procedures to describe its approach to the identification of modern slavery risks, and steps to be taken to prevent slavery and human trafficking in its operations.

- Our **Prinova Global Code of Business Conduct** sets forward the rules of conduct required of our people as representatives of the Company when dealing with other employees, governmental authorities, suppliers, consumers, competitive commercial bodies, and the community within which Prinova conducts its business. It defines the ethical principles the company will uphold about its own workers and workers in its supply chain. Prinova follows and complies with the requirements of the Ethical Trading Initiative Base Code with regards to human rights.
- Our **Sustainability Policy** reinforces the belief that we have both the power and the responsibility, as a Business, to protect the place we call home, and the people who live in it. We establish and drive a sustainability strategy covering multiple aspects of Environmental and Social Governance. Our social focus is to protect human rights in our supply chain and our operations.
- Our **Supplier Code of Conduct** applies to all suppliers that provide goods and/or services to Prinova. Suppliers are responsible for compliance to this policy throughout their operations and their supply chain. The Supplier Code of Conduct outlines the requirement for them to comply with the requirements of the ETI base code, and outlines specific additional points about child labour, forced labour and human trafficking.
- Our **Prinova Human Rights Policy** strengthens our commitment to respecting, protecting, and promoting human rights in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Ethical Trading Initiative (ETI) Base Code, and all applicable laws and regulations pertaining to Human Rights in the countries we operate.

- Our **Child Labour and Young Worker Policy** outlines Prinova's position on child labour and the employment of young workers, including those participating in internships, apprenticeships, and work experience programmes. This policy is critical to ensuring the protection of the most vulnerable victims of exploitation around the world.

Risk assessment and due diligence

Our Sustainability Team at group level, and our European Senior Leadership Team, have overall responsibility to set our business strategy with regards to modern slavery risk management and initiatives in the business. They establish our policies and provide resources to execute our work in line with our commitments. They also have responsibility to ensure that any known or suspected instances of slavery and human trafficking are dealt with quickly and effectively, that all relevant stakeholders are made aware of the matter in question and that corrective action plan executed. Specific responsibilities, contact details and reporting lines are incorporated in our policies.

In practice we can divide our risk assessment and associated due diligence efforts with relation to modern slavery into two principal areas:

1. Internal operations

Temporary labour - temporary labour and 3rd party labour providers is the higher risk areas for human right breaches in our internal operations. Our PSEL manufacturing facility operates in a region (Kent, UK) where fresh produce industry is predominant. As a result, many temporary workers operate in farms and manufacturing businesses in the region. This is a sector highly vulnerable to human rights abuse and therefore tightly regulated in the UK. Labour providers must be licensed with the GLAA³, providing us with heightened guarantees of controls in place to prevent workers exploitation. Our HR team ensures that those licenses are in place and active. We also perform independent, ad-hoc controls throughout the year over the agencies we use. This includes controls of right to work documents of temporary workers in our care, contracts, and payslip evidence in line with working hours we record.

Auditing of our operations – Every 2 years, our operations are audited by 3rd party body against the SMETA 4-pillar audit standard. This is the most widely used audit standard designed to help protect workers from unsafe conditions, overwork, discrimination, low pay, and forced labour. Onsite SMETA audits were undertaken both in our London and Kent locations in 2025 with all non-conformances identified by the audit closed timely and improvement opportunities identified implemented.

2. **Supply chain controls** – Prinova is a supplier-buyer (AB) member of Sedex. As part of doing business with us, suppliers and manufacturers of ingredients are encouraged to become members of Sedex, complete their Sedex Self-Assessment Questionnaire (SAQ) and provide visibility over their operations. We use the Sedex platform to manage risk within our

³ Gangmasters & Labour Abuse Authority - <https://www.gla.gov.uk/>

supply chain and identify potential non-conformances. This has been the primary focus of our modern slavery initiatives since 2021 to drive supplier engagement and transparency.

Where risks are identified in our supply chain through the Sedex platform, suppliers are required to be audited against the SMETA 4-pillar standard. For high-risk manufacturers due to the region of operation or activity sector, audits are required every 2 years. Should non-conformances be identified, comprehensive corrective action plans are requested and monitored by our sustainability team

Our due diligence currently extends to the manufacturers we buy from directly. We do not yet have visibility of the labour practices at their own raw-material sources, and we recognise that in agricultural and commodity-based ingredient supply chains this is often where the risk of forced labour is greatest. We are investigating the approach, measures and tools that would be appropriate to address the higher-risk ingredient categories in our portfolio.

Reporting and dealing with incidents

Prinova Europe encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation through a clear speak up policy. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

To encourage reporting, Prinova also provides a confidential whistleblowing hotline⁴. This whistleblowing process is designed to make it easy for anyone to make disclosures related to unethical business practices. Employees who have concerns can complete our confidential disclosure form and are protected from any retaliation as per policies in place. Reports are handled by a small, named group of senior executives at group level who are trained in handling sensitive disclosures. Access is restricted to protect the confidentiality of the person raising the concern. The group will appoint an independent investigation team as appropriate to review matters brought to our attention via this process. To date, no whistleblowing incident related to modern slavery or other human rights concerns have been raised through our hotline. We acknowledge this does not imply that modern slavery does not occur in our supply chain and will continue to promote the accessibility and awareness of this channel.

Our focus in 2025-2026

In early 2026, we undertook a strategic review of the Human Rights program at Prinova Europe and agreed a renewed emphasis on supply chain controls. This included a number of enhancements to the program as follows:

1. **Implementing a more robust risk-based approach:** In addition to reviewing the supplier location and industry classification to generate an inherent risk score, we are now supplementing this with supplier specific information including site characteristics and 3rd party review of an SAQ to generate a 'Management Control' score. The inherent risk score

⁴ Prinova whistleblowing hotline: <https://secure.ethicspoint.com/domain/media/en/gui/82853/index.html>

and Management Control scores combined, provide a more reflective risk score for each supplier and allows Prinova to focus our attention on the areas of greatest risk and opportunity.

2. **Increasing supplier coverage:** while we have had an extensive program in place for a number of years, we wanted to further expand our reach through our supply chain and invested in a renewed supplier engagement program, setting a KPI of achieving 80% supplier coverage by product volume.
3. **Improved non-conformance management:** while we have always tracked and monitored non-conformances, we have implemented an improved risk-based approach to ensure we are proactively working with our suppliers on the most significant non-conformances or 'zero tolerance issues' with a sense of urgency and priority. If suppliers do not close or have an appropriate plan in place to close these critical issues, Prinova is committed to taking associated action up to an including termination of the supplier contract.

Looking Ahead

We will continue to embed the changes outlined above during the course of 2026, with the intention to have an enhanced, risk-based approach fully operationalized by the end of the year. This will include greater supplier coverage and therefore greater visibility into the forced labour indicators and non-conformances that occur in our supply chain. We will differentiate non-conformance management ensuring those with the highest severity and highest risk are dealt with swiftly and appropriately. Our efforts will be enabled by having a dedicated Ethical Trade Co-Ordinator support this program, as well as continued Leadership sponsorship and support.

Awareness and Training

Our HR team have embedded Modern Slavery risk training as part of the induction process for all new employees. This is also built in our learning management system to be conducted annually as a refresher training. We believe awareness within our business will drive not only the compliance of our operations but of our supply chain too. 100% of our Prinova Europe employees are covered by this training plan and we achieved an 89.8% completion rate for this period.

Every year, we also use the campaigns in place in the UK around Anti-Slavery Day to continue to raise awareness across our organisation. We share our Modern Slavery Act statement with all employees, as well as training videos and information sheets.

Our Supply chain due diligence efforts were also included in our Prinova Group responsibility report⁵, published on our website.

⁵ prinovaglobal.com/content/dam/prinova/downloads/Prinova-Responsibility-Report-2025.pdf

Director approval

This statement was approved on date 29th September 2026 by Barry Kelly – Group Managing Director for Prinova Europe Ltd.


