

Modern Slavery Statement – Financial Year Ending 2025

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps taken by Watts Farms Produce Holdings Ltd, including Watts Farms Catering Ltd, Watts Farms Packers Ltd and Watts Farms Sales Ltd, to prevent modern slavery and human trafficking within our business and supply chains.

Organisation Structure and Supply Chains

Watts Farms is a grower, packer and distributor of fresh produce, operating within the UK and Portugal. We supply a wide range of produce to the food service and retail sectors. Our supply chains include labour providers, packaging suppliers, raw material suppliers, and logistics services both within the UK and internationally.

Our Commitment

We have a zero-tolerance approach to modern slavery, servitude, forced or compulsory labour, and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our own business or supply chains.

Policies and Governance

Our policies and practices reflect our commitment to acting ethically and with integrity. These include:

- Ethical Trading Policy Statement (aligned with the ETI Base Code)
- Corporate Social Responsibility Policy
- Human Rights Policy
- Migrant Worker Policy
- Anti-Slavery Policy
- Recruitment Policy
- Supplier Code of Conduct
- Whistleblowing Policy
- Equality and Diversity Policy

Our policies are reviewed to ensure they remain effective and up to date.

Due Diligence and Risk Management

We assess the risk of modern slavery within our business and supply chain through:

- Vetting and approval of suppliers, including identifying if they have SEDEX membership and/or other third-party ethical audits
- Monitoring of supplier self-assessments and third party audits
- Ensuring all labour providers are GLAA licensed
- Conducting audits and site visits

Key risk areas include:

- Use of temporary/seasonal agricultural workers
- Sourcing of raw materials from high risk areas
- Outsourced logistics and subcontractors

To manage these risks we:

- Require ethical sourcing declarations and evidence of Modern Slavery prevention actions from suppliers
- Engage directly with a number of suppliers through audits
- Maintain clear channels for staff and workers to report concerns anonymously
- Complete a recruitment fee check with all employees
- Ensure workers are aware of their rights

Training and Awareness

To ensure our employees understand the risks of modern slavery, we:

- Deliver training on modern slavery to all staff
- Use resources from initiatives such as Stronger Together
- Raise awareness among workers about their rights and how to report concerns
- Specialist training for staff involved in recruitment

Effectiveness and Performance Indicators

We monitor our effectiveness through:

- Completion rates of modern slavery training
- Number of reports or concerns raised and investigated
- Supplier non-compliance rates and follow-up actions
- Results of ethical audits

Communication and Reporting

We provide multiple communication channels to enable employees and workers in our supply chain to raise concerns confidentially, including anonymous reporting mechanisms.

Looking Ahead

We are committed to continual improvement and will review our processes to identify further enhancements, including deeper supply chain mapping and more robust monitoring systems.

This statement has been approved by the Board of Directors of Watts Farms Produce Holdings Ltd and is signed on their behalf by:

A handwritten signature in black ink, appearing to be "Ed Gray".

Ed Gray, Director
22 October 2025