

Modern Slavery Statement 2025

This statement is made pursuant to section 54 of the Modern Slavery Act 2015.

It sets out the steps that Vestey Holdings Limited and its associated businesses (the Group) have taken during the financial year ending 31 December 2025, and continue to take, to prevent modern slavery and human trafficking in its own business operations and supply chains.

See Appendix A for the Group businesses covered by this statement.

Our business and supply chains

Vestey Holdings is a fourth-generation family business, involved primarily in the global food industry. We are building upon the legacy of previous generations, and today, our purpose is to enable people, businesses, and communities to develop and flourish for decades to come. The Group's shared values of Honesty, Integrity and Unity reflect who we are, dictate how we operate, and guide how we behave every day.

The Group specialises in the sourcing, processing and distribution of chilled, ambient and frozen products in the meat, fish, seafood, dairy, fruit, vegetables, specialist meal, and fine foods categories. The Group also operates three pension advisory businesses.

In 2025 the Group's turnover was £720m and the Group employed 1,195 colleagues worldwide.

Headquartered in the United Kingdom, we operate in various countries around the world; in 2025 from offices in the UK, France, Denmark, Norway, Belgium, Lithuania, Spain, Poland, Dubai, Oman, the Philippines, Japan and China.

We build long-term partnerships with suppliers and customers alike, and supply products for retail, foodservice, wholesale, hotels and restaurants, governments and manufacturing customers as well as directly to consumers. Our extended supply base is global and encompasses artisanal producers to multi-national operators.

In 2025 the Group continued active membership of the Food Network for Ethical Trade (FNET), strengthening our knowledge and approach to modern slavery and human trafficking and to learn and share best practice.

Our policies

We are committed to working to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our own business operations.

Our policies are underpinned by our respect for internationally recognised codes including:

- The UN Universal Declaration of Human Rights
- The UN Guiding Principles on Business and Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Ethical Trading Initiative (ETI) Base Code
- The United Nations Convention on the Rights of the Child

In 2025 we updated and consolidated the core policies addressing Modern Slavery in our own operations and supply chains and reviewed the resulting single policy against required and best practices. The Vestey Holdings Human Rights Policy is now publicly available on our website.

We also updated the following Group policies that address elements of modern slavery:

- Vestey Holdings Anti-Bullying and Harassment Policy - outlines our approach towards bullying and harassment in our own business operations
- Vestey Holdings Sexual Harassment Policy – outlines our approach towards sexual harassment in our own operations
- Vestey Holdings Ethics Policy - sets out how we conduct ourselves as an organisation, and how we behave when dealing with customers and suppliers. This sets out that adherence to Human Rights issues is a key consideration when considering a business partner.
- Vestey Holdings Whistleblowing Policy. - ensures all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. To support this Policy, we implemented a global confidential whistleblowing platform, available to all colleagues in 2025.

In addition to Group Policies, the Group businesses operate several policies at individual company level, to support their business needs in respect of Human Rights.

Businesses have strengthened standard supplier contractual terms, setting out the standards required of our suppliers and added extra due diligence to ensure compliance to the Modern Slavery Act.

In 2025 we worked with expert consultancy Ergon to develop and launch Vestey Holdings Human Rights Supplier Code of Conduct and a supporting Implementation Guidance document. Both documents are shared with suppliers via the relevant businesses.

In accordance with recruitment policies, UK businesses conduct eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Policies are available to employees via Intranet and business policy banks.

Due diligence and risk assessment

We work to identify potential human rights and modern slavery risks within our service providers and supply chains.

We understand that our potential exposure to Modern Slavery is within our own operations, our product supply chains and some third-party services, and therefore we are focusing our effort in these areas.

Businesses utilise the FNET Human Rights Risk Assessment tool and other resources to conduct a risk assessment of supply base by commodity and country of origin. Through collaboration with FNET working groups we have identified a number of high-risk services in our value chains. This analysis enables us to identify areas of highest risk, through which to focus due diligence and supplier engagement.

Businesses maintain approval programs to help identify indicators of modern slavery practices and validate that our suppliers and service providers meet our criteria before they can be classed as 'Approved'. Specifically, third party certification and risk-based assessments are fundamental in ensuring products conform to local legislation, whilst also assessing our suppliers' suitability and approach to preventing forced labour and modern slavery. If issues are identified, appropriate investigative and remedial actions will be taken.

Suppliers are required to:

- Submit self-assessment questionnaires;
- Share existing Ethical Trade audit results;
- Participate in Ethical Trade audits if requested.

Training

To ensure a level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide awareness training to our commercial, technical and procurement teams, recruiters and line managers.

In addition to mandatory Modern Slavery Awareness training for all colleagues globally, training on the Human Rights Supplier Code of Conduct, supplier self-assessment questions and the Human Rights Supplier Code of Conduct Implementation Guide was delivered to over 80 technical, buying and leadership colleagues in 2025.

Our effectiveness in combating slavery and human trafficking

If an indicator of forced labour is discovered, we will respond in a manner proportionate to the nature and extent of the situation. Serious incidents will require immediate and decisive action and may result in the termination of the business relationship.

For less serious incidents, we will allow the supplier reasonable time to develop and implement a plan for remediation. We will treat termination as a last resort as it is unlikely to resolve the underlying issue and it may be detrimental to those people who rely on the work to survive.

There were a number of indicators of forced labour, slavery or human trafficking identified in 2025. Time-bound corrective actions are being implemented by the suppliers and progress towards resolution is tracked by our teams via SEDEX and direct contact with the suppliers.

Further steps

We will continue to review the effectiveness of the steps we have taken, and we will implement the following in 2025:

- Review and update risk assessment, supplier on-boarding processes and colleague training.
- Review and further update Group policies with reference to best practice and cascade to all Group businesses;
- Continue to collaborate with peers in industry forums to learn from others and effect greater impact;
- Continue to formally seek confirmation and evidence from suppliers that they are following international conventions, national laws and Vestey requirements;
- Continue to raise awareness internally of the issues surrounding Modern Slavery
- Repeat a self-assessment of our organisational maturity using the FNET Human Rights Due Diligence reporting template

This statement was approved by the Board of Vestey Holdings Limited on 02 June 2026

George Vestey
Chief Executive Officer

Appendix A: Vestey Holdings businesses covered by this statement.

Vestey Foods Limited
Vestey Foods UK Limited
Vestey Foods International Limited
VFI Worldwide Limited
Donald Russell Limited
Cottage Delight Limited
Albion Fine Foods Limited
Western Pension Solutions Limited
The D8A People Limited
K3 Advisory Limited
In-Vest & Retire Limited
Vestey Holdings Limited

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VEST EY HOLDINGS

A FAMILY OF BUSINESSES