



Kanes Foods

MODERN SLAVERY STATEMENT



FINANCIAL YEAR 2025
(PUBLISHED DATE : SEPTEMBER 2025)

MANAGING DIRECTOR'S STATEMENT

AS ONE OF THE LARGEST EMPLOYERS IN WORCESTERSHIRE PEOPLE ARE AT THE VERY HEART OF WHAT WE DO.



MODERN SLAVERY SHOULD NOT HAVE ANY PART IN OUR SOCIETY UNFORTUNATELY IT IS SOMETHING THAT WE MUST BE AWARE OF AND CONSIDER.

IN THE COMING YEAR, AND IN LINE WITH OUR CONTINUOUS IMPROVEMENT KANES REMAINS COMMITTED TO STANDING UP TO HUMAN RIGHTS INJUSTICES THROUGH ETHICAL BUSINESS PRACTICES AND DOING EVERYTHING IT CAN TO MITIGATE RISKS OF MODERN SLAVERY TO OUR WORKERS AND THOSE WITHIN OUR SUPPLY CHAIN.

DIVERSITY AND INCLUSION ARE IMPORTANT IN OUR BUSINESS STAFFING POLICIES, AND WE WILL CONTINUE TO ENSURE SAFE OPPORTUNITIES FOR OUR COLLEAGUES. WE WILL CONTINUE TO PROMOTE A POSITIVE CULTURE WITHIN KANES WHERE COLLEAGUES FEEL HEARD.

IT IS ALSO A NECESSITY THAT ALL WORKERS WITHIN OUR SUPPLY CHAIN ARE TREATED WITH RESPECT AND DIGNITY AND ARE FREE FROM THREATS, INTIMIDATION AND EXPLOITATION.

THIS MODERN SLAVERY STATEMENT SUMMARISES THE STEPS WE HAVE TAKEN SO FAR AND OUTLINES OUR COMMITMENTS AS WE WORK TOGETHER TO ENHANCE HUMAN RIGHTS AND END EXPLOITATION.

Mark Fisher

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MANAGING DIRECTOR



STRUCTURE & OVERVIEW

KANES IS A LEADING PRODUCER OF PREPARED MEAL SOLUTIONS, SUPPLYING THE UK RETAIL MARKET FROM OUR 28 ACRE SITE IN WORCESTERSHIRE.

OUR MISSION IS

TO DELIGHT OUR CUSTOMERS WITH INDUSTRY LEADING QUALITY, SERVICE AND VALUE, ALWAYS ACTING ETHICALLY AND RESPONSIBLY.

WE ARE COMMITTED TO DEVELOPING OUR PEOPLE AND PROVIDING LONG-TERM, SECURE EMPLOYMENT AND GROWTH OPPORTUNITIES.

STRATEGY AND STATEMENT

THIS STATEMENT RELATES TO ACTIONS AND ACTIVITIES DURING THE FINANCIAL YEAR 1ST APRIL 2024 TO 31ST MARCH 2025.

OUR STRATEGY IS BASED ON FOUR PRINCIPLES, ALONG WITH THE CORE BUSINESS VALUES.

PREVENTION DUE DILIGENCE MANAGEMENT COMMITMENTS

EFFECTIVE POLICIES & PROCESSES

PROTECTING VICTIMS & LEGAL INTEGRITY

WIDESPREAD AWARENESS & TRAINING

TARGETS FOR THE NEXT FINANCIAL YEAR

HONEST
TRUTHFUL, ETHICAL
AND FAIR TO ALL.



RESPECTFUL
BE KIND, COURTEOUS WITH
OPEN COMMUNICATION,
WHERE DIFFERENCE IS
ACKNOWLEDGED AND
VALUED.



UNITED
JOINED TOGETHER TO WORK
AS ONE TEAM SHARING
KNOWLEDGE, AND COMBINE
WITH THE STRENGTHS OF
OTHERS.



PROACTIVE
ANTICIPATE PROBLEMS
ENGAGE IN CHANGE AND
PLAN FOR POSITIVE FUTURE
RESULTS.



PREVENTION

PREVENTION

POLICY & PROCESS FRAMEWORK

OUR POLICY SUPPORTS KANES FOODS COMMITMENT TO TACKLING MODERN SLAVERY, AND IS REVIEWED ON A REGULAR BASIS IN ORDER TO MAINTAIN OUR HIGH STANDARDS OF DUE DILIGENCE AND CONTINUOUS IMPROVEMENT. THE RELEVANT LEADERS OF THE PEOPLE TEAM, TECHNICAL, PURCHASING AND OPERATIONS FUNCTIONS ARE RESPONSIBLE FOR THE IMPLEMENTATION, DEVELOPMENT, AND ON-GOING MAINTENANCE OF THE POLICY WITHIN THEIR RESPECTIVE BUSINESS UNITS.

MODERN SLAVERY & HIDDEN EXPLOITATION

OUR MODERN SLAVERY AND HIDDEN EXPLOITATION POLICY OUTLINES KANES FOOD LTD'S MEASURES IN PLACE TO PREVENT MODERN SLAVERY AND EXPLOITATION

HUMAN RIGHTS POLICY

THE HUMAN RIGHTS POLICY SETS OUT OUR COMMITMENT TO RESPECTING HUMAN RIGHTS IN LINE WITH PRINCIPLES AND STANDARDS SET BY UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS (UNGPS). THE ETHICAL TRADING INITIATIVE BASE CODE (ETI BASE CODE) PROVIDES THE SUPPORTING STRUCTURE WITHIN WHICH OTHER POLICIES RELATING TO MODERN DAY SLAVERY AND LABOUR EXPLOITATION SIT.

RESPONSIBLE LABOUR PROVIDERS POLICY

WE OPERATE A ROBUST RECRUITMENT PROCESS, INCLUDING CONDUCTING ELIGIBILITY TO WORK IN THE UK CHECKS FOR ALL EMPLOYEES TO SAFEGUARD AGAINST HUMAN TRAFFICKING OR INDIVIDUALS BEING FORCED TO WORK AGAINST THEIR WILL.

WE COLLABORATE BOTH INTERNALLY AND EXTERNALLY TO ASSESS ALL LABOUR PROVIDERS FOR POTENTIAL RISKS OF LABOUR EXPLOITATION OR BREACHES OF COMPANY STANDARDS AND COMMITMENTS.

WHISTLE BLOWING POLICY

THE ORGANISATION'S WHISTLE BLOWING PROCEDURE IS DESIGNED TO MAKE IT EASY FOR WORKERS TO MAKE DISCLOSURES, WITHOUT FEAR OF RETALIATION.

WE ENCOURAGE ALL WORKERS, CUSTOMERS, AND BUSINESS PARTNERS TO REPORT ANY CONCERNS THEY HAVE. WE SUPPORT SEVERAL LANGUAGES AND ANONYMOUS SUBMISSIONS IF PREFERRED.

THESE POLICIES APPLY THE PRINCIPLES AND PROTOCOLS OF STRONGER TOGETHER.

ETHICAL TRADING

AT KANES FOODS, ETHICAL TRADING IS CENTRAL TO HOW WE SOURCE, OPERATE, AND BUILD RELATIONSHIPS ACROSS OUR GLOBAL SUPPLY CHAIN.

WE ARE COMMITTED TO RESPECTING HUMAN RIGHTS, ENSURING FAIR WORKING CONDITIONS, AND MAINTAINING TRANSPARENT AND RESPONSIBLE SOURCING PRACTICES.

BY SETTING CLEAR EXPECTATIONS FOR OUR SUPPLIERS, CLOSELY MONITORING COMPLIANCE, AND WORKING COLLABORATIVELY ACROSS THE INDUSTRY, WE AIM TO REDUCE THE RISKS OF MODERN SLAVERY AND OTHER LABOUR RIGHTS ABUSES.

OUR APPROACH COMBINES ROBUST APPROVAL PROCESSES, ONGOING RISK ASSESSMENT, AND ACTIVE ENGAGEMENT WITH PARTNERS TO DRIVE CONTINUOUS IMPROVEMENT AND SAFEGUARD WORKERS THROUGHOUT OUR SUPPLY CHAIN.

DUE DILIGENCE AND RISK MITIGATION

DUE DILIGENCE, RESPONSIBLE RECRUITMENT, AWARENESS RAISING & COMMUNICATION

EFFECTIVE MANAGEMENT OF THE BUSINESS AS WELL AS ITS LABOUR SUPPLY CHAIN IS PARAMOUNT TO ENSURING BEST PRACTICE AND COMPLIANCE.

LABOUR PROVIDERS ARE REQUIRED TO HAVE A GANGMASTERS AND LABOUR ABUSE AUTHORITY (GLAA) LICENCE AND FOLLOW THE PROVISIONS OF THE GANGMASTERS (LICENSING) ACT 2004 AND THE IMMIGRATION ACT 2016. THE ROLE OF THE GLAA IS TO PROTECT VULNERABLE AND EXPLOITED WORKERS.

KANES FOODS IMPLEMENTS INTERNAL AND EXTERNAL ETHICAL AUDITS TO ENSURE COMPLIANCE AND MAINTENANCE OF OUR STANDARDS FOR THE CONDITIONS OF OUR WORKERS. THE AUDIT FRAMEWORK COMPARES SYSTEMS AGAINST ETI BASE CODE, EMPLOYMENT LAW AND POLICIES. OUR BUSINESS HAS AN ACTION PLAN THAT ENABLES NON COMPLIANCE TO BE DEALT WITH PROMPTLY AND EFFECTIVELY, WORKING TOGETHER TO DEVELOP BEST PRACTICE INITIATIVES.

OUR APPROVED SUPPLIERS ARE REQUIRED TO ADHERENCE TO ETHICAL STANDARDS AND EMPLOYMENT LAW, LABOUR PROVIDERS ARE RISK ASSESSED TO IDENTIFY POTENTIAL AREAS OF RISK OF LABOUR EXPLOITATION OR BREACHES OF COMPANY STANDARDS & COMMITMENTS.

HIGHER RISK AREAS:

THE GREATEST RISK OF MODERN SLAVERY IN OUR BUSINESS IS IN RECRUITMENT PROCESSES. LABOUR PROVIDER MANAGEMENT IS CORE TO BUILDING RESPONSIBLE RECRUITMENT PROCESSES, WITHIN OUR RESPONSIBLE RECRUITMENT POLICY.

THE PURPOSE OF OUR RESPONSIBLE USE OF LABOUR PROVIDERS POLICY IS TO HAVE A DOCUMENTED AND STRUCTURED LABOUR PROVIDER MANAGEMENT PROCEDURE TO ENSURE THAT ALL LABOUR PROVIDERS ARE FULLY RISK ASSESSED TO IDENTIFY POTENTIAL AREAS OF RISK OF LABOUR EXPLOITATION OR BREACHES OF COMPANY STANDARDS & COMMITMENTS AND GLAA LICENSING STANDARDS.

RISK ASSURANCE THROUGH:
TENDER PROCESS FOR THE SELECTION OF EXTERNAL RECRUITMENT AGENCIES
AUDIT AND APPROVAL OF ALL EXTERNAL AGENCIES
SERVICE LEVEL AGREEMENTS IN PLACE WITH ALL EXTERNAL PARTNERS
ALL LABOUR PROVIDERS ARE AUDITED AT LEAST ANNUALLY,
STRUCTURED INDUCTION AND TRAINING PROCESSES.



MANAGEMENT

TRAINING AND AWARENESS

OUR AWARENESS PROGRAMME HAS BEEN DESIGNED TO BUILD AWARENESS AND UNDERSTANDING OF LABOUR EXPLOITATION AND MODERN SLAVERY RISKS AND INDICATORS.

MODERN SLAVERY AND EXPLOITATION IS CONSTANTLY EVOLVING, BY REVIEWING AND UPDATING OUR TRAINING MATERIALS REGULARLY, WE MITIGATE RISK AND PROTECT PEOPLE.

INDUCTION LEVEL

ALL OUR COLLEAGUES AT KANES FOODS LTD AND ALL OUR AGENCY WORKERS COMPLETE BASIC ETHICS TRAINING AT INDUCTION.

STRONGER TOGETHER TRAINING, CONTAINING INFORMATION ON WORKERS' RIGHTS, GRIEVANCE MECHANISMS AND MODERN SLAVERY. THIS ALSO INCLUDES, HOW TO PREVENT AND FLAG SLAVERY AND HUMAN TRAFFICKING, ALONG WITH WHAT EXTERNAL HELP IS AVAILABLE.

MODERN SLAVERY AWARENESS

THE PURPOSE OF THIS IS TO HELP RAISE AWARENESS AND IMPROVE EDUCATION ON THIS TOPIC. BUILDING A CLEAR UNDERSTANDING OF MODERN SLAVERY AND POTENTIAL INDICATORS WITH AS MANY COLLEAGUES AS POSSIBLE, AND CLEARLY COMMUNICATE CORRECT LINES OF REPORTING ANY CONCERNS.

TRAINING MATERIAL IS PERIODICALLY SHARED ON KANES FOODS COLLEAGUE ENGAGEMENT PLATFORM. STRONGER TOGETHER EDUCATION AND AWARENESS VIDEOS ARE SHARED ON THE TV SCREEN IN THE CANTEEN.

OUR PEOPLE TEAM HAVE COMPLETED THE STRONGER TOGETHER TACKLING MODERN SLAVERY IN BUSINESS TRAINING.

KEY MEMBERS OF OUR PEOPLE TEAM HAVE COMPLETED STRONGER TOGETHER INTRODUCTION TO RESPONSIBLE RECRUITMENT TRAINING.

THIS ENSURES CONSISTENT IMPLEMENTATION OF VARIOUS RECRUITMENT PROCEDURES BY BUILDING AN UNDERSTANDING OF THE NATURE AND IMPACT OF RISKS DURING RECRUITMENT.

EFFECTIVE HUMAN RIGHTS DUE DILIGENCE IN SUPPLY CHAINS

A NUMBER OF OUR PROCUREMENT, TECHNICAL AND PEOPLE TEAMS HAVE COMPLETED THE STRONGER TOGETHER EFFECTIVE HUMAN RIGHTS DUE DILIGENCE IN SUPPLY CHAINS TRAINING.



SUPPLY CHAIN MANAGEMENT & DUE DILIGENCE

SUPPLIER APPROVAL AND MONITORING

KANES FOODS IS A LEADING UK SUPPLIER OF PREPARED SALADS AND STIR-FRY PRODUCTS, SUPPORTED BY A DIVERSE AND GLOBAL SUPPLY CHAIN SPANNING MULTIPLE SECTORS. WE SOURCE OVER 150 TYPES OF RAW MATERIALS FOR OUR PRODUCTS, INCLUDING FRESH PRODUCE, INGREDIENTS, AND PACKAGING, FROM AROUND 30 COUNTRIES WORLDWIDE. WE ONLY PROCURE RAW MATERIALS FROM FULLY MAPPED SUPPLY CHAINS WITH CLEAR TRACEABILITY UPSTREAM.

WE RECOGNISE THE HUMAN RIGHTS CHALLENGES AND RISKS INHERENT IN SUCH A COMPLEX SUPPLY CHAIN. TO ADDRESS THESE, WE OPERATE A ROBUST SUPPLIER APPROVAL PROCESS ALONGSIDE ONGOING MONITORING TO ENSURE COMPLIANCE WITH OUR ETHICAL STANDARDS.

AS A MINIMUM REQUIREMENT, WE EXPECT ALL SUPPLIERS TO ADOPT THE PRINCIPLES OF THE ETHICAL TRADING INITIATIVE (ETI) BASE CODE AND TO WORK TOWARDS FULL COMPLIANCE WITH ITS PROVISIONS. WE ALSO REQUIRE OUR DIRECT SUPPLIERS TO COMPLY WITH THE ETHICAL POLICIES OF OUR CUSTOMER BASE AND TO CASCADE THESE REQUIREMENTS THROUGHOUT THEIR OWN SUPPLY CHAINS.

IN 2024, KANES FOODS BECAME AN AB MEMBER OF SEDEX, STRENGTHENING OUR ABILITY TO ASSESS RISK AND ENHANCE CONTINUOUS SUPPLIER MONITORING. ALL SUPPLIERS MUST BE REGISTERED ON SEDEX (SUPPLIER ETHICAL DATA EXCHANGE), COMPLETE A SELF-ASSESSMENT QUESTIONNAIRE AT LEAST ANNUALLY, AND, WHERE HIGHER RISKS ARE IDENTIFIED, UNDERGO AN INDEPENDENT THIRD-PARTY SOCIAL AUDIT. ADDITIONALLY, WE CONDUCT REGULAR AUDITS OF OUR SUPPLIERS AND REVIEW THEIR PERFORMANCE AGAINST OUR ETHICAL TRADING REQUIREMENTS.

COLLABORATION

WE RECOGNISE THAT THE COMPLEX HUMAN RIGHTS CHALLENGES WITHIN THE FOOD INDUSTRY CAN ONLY BE EFFECTIVELY ADDRESSED THROUGH COLLABORATION. IN 2025, WE JOINED THE FOOD NETWORK FOR ETHICAL TRADE (FNET) TO WORK ALONGSIDE INDUSTRY PEERS AND EXPERTS, SHARE EXPERIENCES, AND STRENGTHEN OUR APPROACH TO RESPONSIBLE SOURCING AND HUMAN RIGHTS DUE DILIGENCE.

WE ARE COMMITTED TO BUILDING LONG-TERM RELATIONSHIPS WITH OUR SUPPLY BASE, FOSTERING OPEN DIALOGUE, AND PROMOTING JOINT ACTION TO ADDRESS HUMAN RIGHTS CHALLENGES.

WITHIN OUR ORGANISATION, WE HAVE ESTABLISHED AN ETHICAL AND MODERN SLAVERY WORKING GROUP, BRINGING TOGETHER REPRESENTATIVES FROM SENIOR MANAGEMENT, PEOPLE TEAM, TECHNICAL, PROCUREMENT, AND SUSTAINABILITY. THIS GROUP MEETS REGULARLY TO IMPROVE CROSS-FUNCTIONAL COLLABORATION AND TO ENSURE A CONSISTENT, COORDINATED APPROACH TO TACKLING MODERN SLAVERY AND WIDER ETHICAL ISSUES.



TARGET COMMITMENT UPDATES 2024/2025

DURING THE FINANCIAL YEAR 2024-2025, WE HAVE DELIVERED ON A NUMBER OF COMMITMENTS SET OUT IN OUR PREVIOUS STATEMENT:

PARTNERSHIPS & MEMBERSHIPS

BECAME AN ACTIVE MEMBER OF THE FOOD NETWORK FOR ETHICAL TRADE (FNET), WORKING WITH PEERS TO DRIVE INDUSTRY-WIDE IMPROVEMENTS.

INDEPENDENT ASSESSMENT & CONTINUOUS IMPROVEMENT

COMMISSIONED A DEDICATED STRONGER TOGETHER AUDIT TO BENCHMARK OUR PRACTICES AND IDENTIFY OPPORTUNITIES FOR FURTHER IMPROVEMENT, SUPPORTING WORKING TOWARDS ACHIEVING STRONGER TOGETHER BUSINESS PARTNER

GOVERNANCE & ACCOUNTABILITY

ESTABLISHED AN ETHICAL WORKING GROUP TO OVERSEE PROGRESS, REVIEW RISKS, AND DRIVE ACCOUNTABILITY FOR HUMAN RIGHTS COMMITMENTS.

SUPPLY CHAIN TRANSPARENCY

UPGRADED OUR SEDEX MEMBERSHIP, ENABLING MORE ROBUST SUPPLY CHAIN DUE DILIGENCE AND DATA-SHARING WITH CUSTOMERS AND SUPPLIERS.

ENHANCED TRAINING & AWARENESS

EXPANDED STRONGER TOGETHER TRAINING TO MANAGEMENT TEAMS, STRENGTHENING UNDERSTANDING OF RESPONSIBLE RECRUITMENT AND ETHICAL LABOUR PRACTICES.

THESE ACHIEVEMENTS REFLECT OUR CONTINUED FOCUS ON EMBEDDING ETHICAL BUSINESS PRACTICES, STRENGTHENING GOVERNANCE, AND BUILDING RESILIENCE ACROSS OUR OPERATIONS AND SUPPLY CHAIN.

TARGETS 2025/2026

OVER THE NEXT YEAR, WE WILL BUILD ON THE PROGRESS WE HAVE MADE AND CONTINUE TO UPHOLD OUR COMMITMENT TO ADDRESSING MODERN SLAVERY AND LABOUR EXPLOITATION WITHIN A WIDER HUMAN RIGHTS FRAMEWORK.

IN PARTICULAR, THE FOCUS AND TARGETS FOR 2025-26 WILL INCLUDE:

CONTINUALLY MONITORING, REFINEMENT AND REVIEW OF THE EFFECTIVENESS OF OUR PROCESSES AND ACTIONS RELATED TO MODERN SLAVERY, LABOUR EXPLOITATION AND SUPPLY CHAIN DUE DILIGENCE.

REVIEWING AND UPDATING RELEVANT POLICIES.

IMPROVEMENT OF OUR TRAINING - OUR MODERN SLAVERY AWARENESS AND TRAINING REQUIREMENT WILL CONTINUE TO EXPAND, ADDING NEW STAKEHOLDERS AND INCREASING THE SCOPE OF MATERIALS.

ONGOING REVIEW AND UPDATES OF AUDIT AND RISK ASSESSMENT TOOLS FOR AGENCIES.

STRENGTHEN SUPPLY CHAIN RISK ASSESSMENT – ENHANCE OUR ETHICAL RISK ASSESSMENT PROCESSES TO IDENTIFY AND PRIORITISE SALIENT HUMAN RIGHTS RISKS ACROSS OUR GLOBAL SUPPLY CHAIN.

ESTABLISH KPIS – DEFINE AND IMPLEMENT KEY PERFORMANCE INDICATORS (KPIS) FOR ETHICAL TRADING TO MONITOR SUPPLIER COMPLIANCE, AUDIT OUTCOMES, AND CONTINUOUS IMPROVEMENT.

DEEPEN COLLABORATION – CONTINUE TO COLLABORATE WITH INDUSTRY PEERS, NGOS, AND EXPERT BODIES THROUGH FNET AND OTHER INITIATIVES TO SHARE BEST PRACTICE AND STRENGTHEN OUR COLLECTIVE IMPACT.

EXPAND SUPPLIER ENGAGEMENT – PROVIDE GUIDANCE, AND SUPPORT FOR SUPPLIERS TO IMPROVE AWARENESS OF MODERN SLAVERY RISKS AND BUILD CAPABILITY TO MEET OUR ETHICAL STANDARDS.

INTERNAL CAPACITY BUILDING – PROVIDE FURTHER TRAINING FOR EMPLOYEES INVOLVED IN PROCUREMENT, TECHNICAL, AND SUSTAINABILITY FUNCTIONS TO STRENGTHEN KNOWLEDGE AND OWNERSHIP OF ETHICAL SOURCING.

OVER THE NEXT 12 MONTHS OUR INTENTION IS TO CONTINUE WORKING TOWARDS BECOMING BUSINESS PARTNER STATUS WITH STRONGER TOGETHER.

DECLARATION

THIS STATEMENT HAS BEEN REVIEWED BY THE BOARD OF DIRECTORS AND IS AUTHORISED ON BEHALF OF THE BOARD BY MARK FISHER, MANAGING DIRECTOR 12/9/2025 WHO WILL REVIEW AND UPDATE IT ANNUALLY.

MARK FISHER. MANAGING DIRECTOR