

# Modern Slavery Statement 2025

Bakkavor

## Introduction

The Directors present this Modern Slavery Statement for the 52-week period ended 27 December 2025 (“FY25”) for Bakkavor Group Limited and its relevant group subsidiaries, formerly Bakkavor Group plc, (“Bakkavor”, the “Company”, or the “Group”) prior to the Company’s acquisition by Greencore Group plc.

**Acquisition of Bakkavor by Greencore:** On 15 May 2025, the Group Boards of Greencore Group plc (“Greencore”) and Bakkavor announced that they had reached agreement on the terms of a recommended offer for the entire issued and to be issued share capital of Bakkavor (the “Acquisition”). The Acquisition completed on 16 January 2026 and Bakkavor became a wholly owned subsidiary of Greencore. On the same day, Bakkavor shares were suspended from trading on the London Stock Exchange (“LSE”) and on 19 January 2026, the Financial Conduct Authority cancelled the listing of Bakkavor shares. On 21 January 2026, the Company re-registered as a private limited company, Bakkavor Group Limited, and is a large private company as at the date of signing this Modern Slavery Statement. For FY25 and up to the date of the Acquisition, Bakkavor was a quoted entity, with a premium listing on the London Stock Exchange.

**About this report:** Although Bakkavor no longer operates as a standalone organisation, it remains essential that the Company reports transparently on the steps taken during the FY25 reporting period to prevent modern slavery and uphold human rights across the business and supply chains, including as part of its responsibility under Section 54 of the UK Modern Slavery Act 2015.

During the reporting year, Bakkavor operated as a major UK provider of fresh prepared food, with responsibility for the welfare and dignity of colleagues across its operations and supply chains. The organisation took sustained steps to uphold human rights, set clear expectations for suppliers, and deliver training and awareness initiatives to help colleagues recognise and report risks of exploitation.

Oversight of modern slavery and broader social risks was embedded across the business, supported by the ESG function and the Responsible Sourcing Governance group, with ultimate accountability resting with the Group Board via the ESG Committee (in place prior to the Acquisition). Collaboration, including Bakkavor’s partnership with Stronger Together, continued to strengthen standards and support effective practice across the sector.

This final statement for Bakkavor, as a standalone business, reflects the progress made during the reporting period and the high standards expected throughout the organisation. It has been reviewed by senior management and reviewed and approved by the Sustainability Committee of the Board of Directors of Greencore Group plc on 6th May 2026. As Greencore, we recognise this foundation and remain committed to maintaining strong ethical practices as our businesses come together.



Dalton Philips  
Group Chief Executive Officer  
Greencore Group plc



Donna-Maria Lee  
Chief People Officer  
Greencore Group plc (formerly at  
Bakkavor Group plc)



Date of Director sign off and Board approval: 6<sup>th</sup> May 2026

Future ESG and sustainability disclosure will be reported by Greencore Group plc, please see [www.greencore.com/sustainability/](http://www.greencore.com/sustainability/) for further details.



**THE BUSINESS AND ITS SUPPLY CHAINS**

**About Bakkavor**

During 2025, Bakkavor was the leading provider of fresh prepared food in the UK. Its principal activities comprised the manufacture and supply of fresh prepared foods and fresh produce to the major grocery retailers in the UK, who sell these products to consumers predominantly under their respective private labels. During the year, the Company employed around 14,000 colleagues in the UK, operating from 26 sites, supplying a portfolio of c.1,600 products across meals, pizza & bread, salads and desserts, and worked with c.700 suppliers across its well-established supply chain.

**About Greencore**





Prior to the acquisition of Bakkavor, Greencore was a leading manufacturer of convenience food in the UK, employing around 13,300 people, generating revenues of £1.95bn in FY25 (12 months to September 2025) and headquartered in Dublin, Ireland. Its products can be found across the UK in major grocery retailers, travel hubs, discounters, coffee shops, and other key food-to-go destinations.

The combination of Greencore and Bakkavor creates a leading UK convenience food business with a combined revenue of c.£4 billion and approximately 28,000 employees. The acquisition will lead to more opportunities for colleagues, deliver even better quality, service and innovation for customers and generate value for shareholders, enhancing resilience for both businesses. It will combine the best people in the industry to drive performance on every level, provide greater breadth of category range and deepen customer relationships. The increased scale also amplifies Greencore’s ability to make a positive sustainability impact across its operations, supply chain, and the communities it serves.

**BAKKAVOR VALUES**

During the year, Bakkavor was proud to be a values-led business. The vision and purpose were underpinned by these values and remained the foundation of the culture.

PROUD TO LIVE OUR VALUES

 <p style="margin-top: 10px; font-size: small;">RESPECT AND TRUST EACH OTHER</p>	 <p style="margin-top: 10px; font-size: small;">KEEP THE CUSTOMER AT THE HEART OF WHAT WE DO</p>	 <p style="margin-top: 10px; font-size: small;">GET IT RIGHT, KEEP IT RIGHT</p>	 <p style="margin-top: 10px; font-size: small;">BE PROUD OF WHAT WE DO</p>
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The commitment to help end modern slavery reflects these values. In particular, the Company was committed that supply chain operations should have a positive impact, creating opportunities for people all over the world.

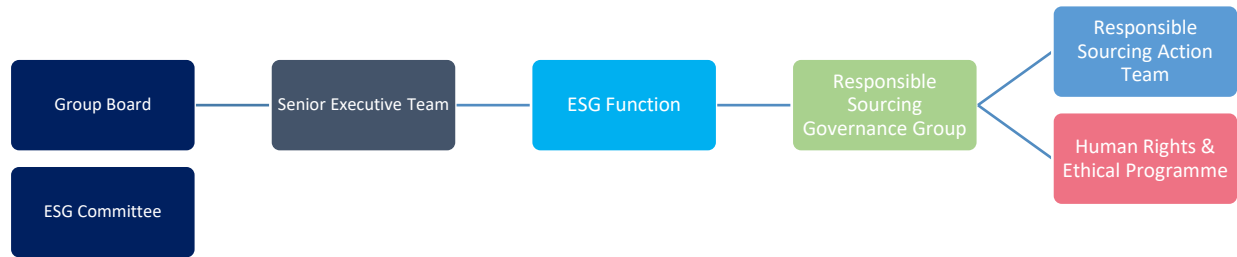
**OUR GROUP ESG STRATEGY**

Trusted Partner was the Environment, Social and Governance (“ESG”) Strategy that guided progress towards a more sustainable business during the reporting year.

It was built around three focus areas:



- 1. Responsible Sourcing** in the supply chain
- 2. Sustainability and Innovation** in operations
- 3. Engagement and Wellbeing** in workplaces and communities



The ESG Governance structure, in place in FY25, included ethical trade and human rights in own operations and supply chain. It reported into the Group ESG team.

**ETHICAL TRADE AND HUMAN RIGHTS GOVERNANCE**

During the year, Bakkavor’s Group Board responsibility for ethical trade and human rights was as set out below:

<p><b>Group Board</b></p> <p>Overall responsibility for ethical trade and human rights</p> <p><b>CEO: Mike Edwards</b></p>	
<p><b>Bakkavor Internal Operations</b></p> <p>Responsibility within Bakkavor sites</p> <p><b>Chief People Officer: Donna-Maria Lee</b></p>	<p><b>Bakkavor Supply Chain</b></p> <p>Responsibility in the Bakkavor supply chain</p> <p><b>Chief Financial Officer: Lee Miley</b></p>



**INTERNAL ETHICAL TRADE TEAM**

The Group Human Rights and Ethical Programme was driven by the internal ethical trade team, formed of a nominated Head of Human Resources, two Senior HR Business Partners and an external ethical trade specialist.

The team’s purpose was to ensure that Bakkavor’s own operations understood and complied with the required ethical standards, developed ethical policies and processes, provided training and support, and developed and agreed the Group’s ethical trade and modern slavery action plans.



**RESPONSIBLE SOURCING GOVERNANCE GROUP**

The Responsible Sourcing Governance Group set the direction on strategy and policies for Bakkavor in the UK.

The Responsible Sourcing Action Team implements the strategy and policies and ensures that progress is tracked and managed.

These are valuable forums for building the capacity of the UK business to stay informed of emerging threats and ensuring the business is well positioned to respond to these.

**Responsible Sourcing**  
Risk assessment - Own operations and supply chain



**OTHER RELEVANT POLICIES**

During the year, the Company’s approach to tackling modern slavery in its own business and its supply chain was underpinned by the following policies:

- Ethical Trade and Human Rights Policy
- Internal Human Rights and Ethical Trading Policy
- Anti- Bribery and Business Ethics Policy
- Bakkavor Code of Conduct
- Inclusion and Diversity Policy
- Whistleblowing Policy
- Supplier Code of Conduct
- Anti-Money Laundering Policy



- Group Remediation Policy
- Group Response Plan Team Policy
- Resourcing and Recruitment Policy

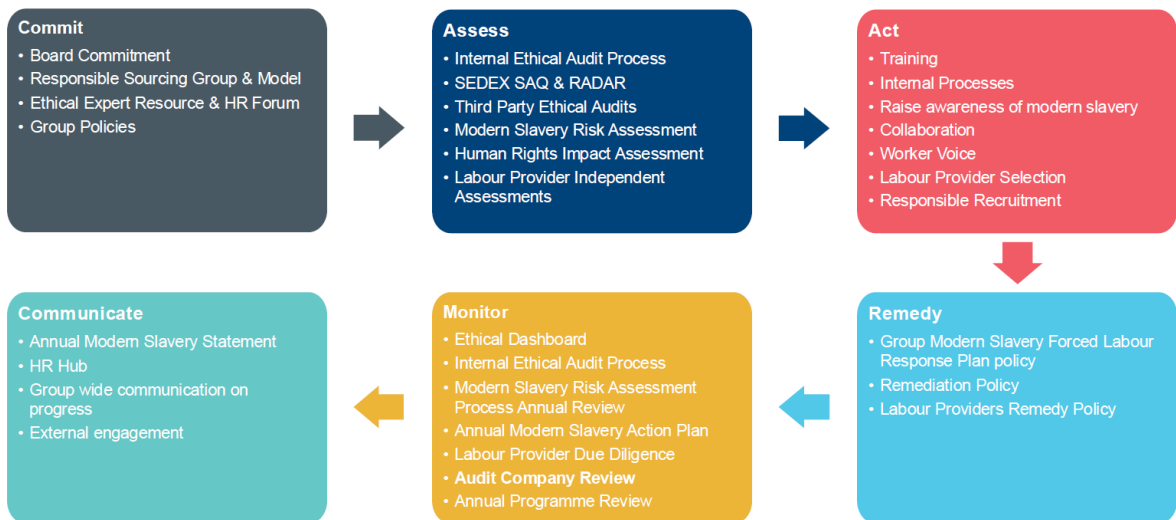
**RISK ASSESSMENTS AND AUDITS WITHIN OWN OPERATIONS**

Bakkavor’s approach to risk assessments and audits was unchanged during the year, and the Company continued assessing its own operations, including for potential risks.

**HUMAN RIGHTS AND ETHICAL TRADE PROGRAMME**

The Bakkavor Human Rights and Ethical Trade Programme brought together all the activities undertaken at group and site level into a common framework:

**Bakkavor Human Rights & Ethical Trade Programme 2025**



The programme was reviewed annually and updated as required. In FY25, the focus continued to be on embedding and operationalising.

The programme identified Bakkavor’s risk assessment and audit activities for its own operations:

- **Internal Ethical Audit Process** – supported Bakkavor sites to embed the Human Rights and Ethical Trade Programme. In FY25, six sites completed this process.
- **SEDEX SAQ & RADAR Risk Rating** – all Bakkavor sites in the UK completed the SAQ and updated SEDEX annually. At the end of FY25, all UK sites had achieved a low-risk rating.



- **SEDEX AB member** – Bakkavor was an active Buyer/Supplier (AB) member of SEDEX during the year, playing a leadership role in SEDEX which included providing feedback on the Company’s experiences of using the platform as well as inputting into their system development programme.
- **Third Party SMETA Audits** – Bakkavor sites would complete a third party Sedex Members Ethical Trade Audits (“SMETA”) audit every 4 years or sooner if required by customers (most do not require this for low-risk suppliers). In FY25, there were three Bakkavor sites were required to complete a SMETA audit. The Company took a zero-tolerance approach to non-compliances and closed them out as soon as possible.
- **Modern Slavery Risk Assessment Process** – Bakkavor’s specific internal annual risk assessment process designed to provide each site with a modern slavery risk rating:

Risk Rating	Assessment	Score Range
High Risk	Very likely to have issues of modern slavery	<33%
Medium Risk	Possible there are some issues of modern slavery	33% - 63%
Low Risk	Unlikely to have issues of modern slavery	>67%

The Company’s overall modern slavery risk rating remained the same as the previous financial year at 70%. More than half of Bakkavor sites were low risk for modern slavery. There were six sites that were medium risk sites, which reflects their positions at the end of the year, however, they had action plans to improve the management of this risk.

- **Stronger Together Good Practice Implementation Checklist** – alongside Bakkavor’s modern slavery risk assessment process, all sites completed this [checklist](#) on an annual basis. The checklist enabled the Company to measure how well the business was delivering its Human Rights and Ethical Trade programme.
- **Stronger Together Progress Monitoring Tool** - an [online self-assessment](#) that supports companies to measure their progress and to highlight their next steps in addressing modern slavery risks within their businesses and supply chains. For Bakkavor, this was completed at group level and formed one of the Company’s key performance indicators. Bakkavor was pleased to report that it had maintained its overall score at 79%.
- **Stronger Together and Responsible Recruitment Business Partner** – evidence is uploaded to publicly demonstrate the Company’s commitment to tackling modern slavery. Bakkavor maintained its Business Partner Advanced Verified status in 2025.
- **Speak Up Whistleblowing hotline** – “Speak Up” enables all employees, including agency workers, to raise any potential concerns anonymously and confidentially including those relating to modern slavery. Cases logged in FY25 were investigated thoroughly by site HR colleagues and senior management. Information about the whistleblowing hotline was prominently displayed at all sites. In addition, whistleblowing was monitored by the Group Board at each Group Board meeting.
- **Third Party Labour Provider Annual Audits** – Bakkavor required that labour providers supplying more than ten workers complete an annual audit. This was bespoke to Bakkavor and covered a management systems review, financial due









diligence check, compliance with Bakkavor’s terms of business, recruitment fee risk assessment, analysis of grievance procedures and feedback from agency workers. In FY25, Bakkavor completed its fifth round of these audits, and twelve labour providers completed this audit.

- **Annual Review** – the fifth annual review of the Human Rights and Ethical Programme was conducted for FY25. This enabled the Company to monitor its progress in addressing and reducing risks of modern slavery and make any necessary updates and changes to the programme.

**GROUP MODERN SLAVERY ACTION PLAN 2025**

Using the results from the Modern Slavery Risk Assessment and Stronger Together Good Practice Checklist and the annual review, Bakkavor developed its fifth Group Modern Slavery Action Plan:

Actions	Status
<p><b>1. Continued Modern slavery awareness training</b> Ethical Training to become compliance training on the Learning Management System (LMS) and achieve training target between 75% - 80%</p>	
<p><b>2. Embed Remedy and Remediation Policies</b> Continued to embed Forced Labour Response Plan policy and update the Remediation policy</p>	
<p><b>3. Implement Contractor Modern Slavery Risk Assessment Process</b> Developed and incorporated into the procurement selection process for service providers</p>	
<p><b>4. Agency Labour Third Party Audits</b> Complete fifth annual assessment process of all labour providers by an independent qualified labour provider auditor, and review next steps for the programme</p>	
<p><b>5. Improve Workplace Engagement on modern slavery</b> Implement new ways to improve workforce engagement on modern slavery including a new video, new random checklist and promotion of Anti-slavery day</p>	
<p><b>6. Implementation of Employer Pays Principle</b> Define how to implement the Employer Pays Principle</p>	

Of these actions, five were completed in full. Ethical training achieved 74% against the target and it is expected that the training will be on the Learning Management System in 2026.

**BAKKAVOR SITES TACKLING ISSUES OF MODERN SLAVERY**

A key focus for FY25 was to continue to improve workplace engagement on modern slavery.

The modern slavery random check process was rolled out to all sites in 2025 and 98% of those that responded said they knew the indicators of modern slavery.

Bakkavor supported Anti-Slavery Day on 18 October 2025 for the second time. Sites arranged activities to promote awareness of modern slavery and there were information and posters displayed around the sites.

Bakkavor continued to embed its 'Response Plan' teams, which were established on each site in 2022. Response Plan team members are trained on raising awareness of modern slavery and forced labour and how to report and record cases. Bakkavor used the [Stronger Together Modern Slavery Champion resources](#) to give sites further support.

Bakkavor implemented a new contractor modern slavery risk assessment process as part of the procurement selection process for service providers.

As part of its annual meeting with labour providers, the Company provided a capacity building session on the 'Employers Pay Principle', assessing the risk of recruitment fees and forced labour. In addition, Bakkavor's expectations that labour providers carry out a risk assessment, have a remediation policy and grievance mechanisms in place and provide appropriate remedy for issues identified was set out.

During FY25, the Company focused on identifying potential cases of modern slavery. One example investigated was in Bourne where the on-site staff shop noticed an agency worker was losing weight and looked very tired and withdrawn. The site investigated to establish if there were any indicators of modern slavery around abuse of vulnerability and debt bondage. This was checked in conjunction with the labour provider, and it was agreed there were no issues of forced labour.

## MODERN SLAVERY RISK WITHIN THE SUPPLY CHAIN

Bakkavor had a high level of awareness of the risk of modern slavery within its supply chain. Bakkavor recognised its responsibility to inform suppliers of this risk and to work with them to prevent or eliminate all forms of exploitation from their operations and supply chains.

Bakkavor's human rights requirements are clearly documented within the [Supplier Code of Conduct](#), including specific clauses on modern slavery and migrant labour.

For example, it contained an expectation for suppliers to assess the risk of migrant labour occurring in their own business and supply chains and implement steps commensurate to the severity and likelihood of the adverse impact. As part of doing business, Bakkavor expected its suppliers to have a clear understanding of the processes, fees and costs associated with migrant labour, including fees and costs incurred for migrant worker recruitment at origin, transit (where applicable) from destination countries and any outstanding debts the worker may incur because of the process.

Recognising that modern slavery will not be resolved by any individual business and that the greatest impact will be achieved by working pre-competitively with customers, peers, and suppliers alongside government, enforcement agencies, and civil society, Bakkavor had a clear focus on creating and supporting collaborations and institutions to enable this to happen most effectively.

As part of its commitment to a fair and equitable food system in which people can fully realise their human rights, in FY25, Bakkavor adopted the Food Network for Ethical Trade ("FNET") human rights risk-assessment framework to enhance its existing supplier engagement processes. The FNET framework's consistent, industry-wide methodology made it an ideal tool to support delivery of the Company's goals.

In addition, Bakkavor advanced its approach to supplier human rights due diligence by introducing a standardised process that asked suppliers to provide greater transparency around human rights management systems when sourcing from countries identified as high-risk for modern slavery

In FY25, Bakkavor recruited a dedicated Supply Chain Human Rights Manager to further embed systems introduced in recent years and bring specialist expertise to drive continuous improvement in its approach.

## SUPPLY CHAIN COLLABORATION

### Food Network for Ethical Trade (FNET)

Bakkavor was a founder member of FNET, a collaboration set up to promote greater understanding of and an aligned approach to ethical supply chain management within food supply chains. FNET provides expertise, insight, and a safe space where members can work to address shared human rights challenges.

Bakkavor participated on the FNET Board and chair of the FNET Audit and Risk Committee since 2022. The organisation has seen considerable growth in that period, bringing increased financial complexity and risk exposure. The Audit and Risk Committee has been instrumental in putting measures in place to achieve governance standards aligned with the organisation's growth ambitions, thereby ensuring FNET can continue to play an essential role in building members' capacity to prevent modern slavery in their own operations and supply chains.

### Modern Slavery Intelligence Network (MSIN)

Bakkavor were founding supporters of the Modern Slavery Intelligence Network ("MSIN"), a non-profit collaboration between supermarkets and large food and fresh produce processors created in response to the findings of Operation Fort, the UK's largest ever Modern Slavery investigation. MSIN have been supported by an independent charity, Stop the Traffic, to provide a secure platform for information and intelligence sharing, expert analysis and guidance on modern slavery prevention and remediation. This enables member to share details of incidents through a secure online platform.

### Spanish Ethical Trade Forum

The Spanish Ethical Trade Forum ("ETF") was established to create a non-competitive space where Spanish suppliers and their UK based customers can share best practice on human rights and environmental issues and discuss joint challenges and effective ways to resolve these.

ETF membership continues to grow and Bakkavor was an active participant with both Spanish technical colleagues and the UK-based Responsible Sourcing Team, engaging in events and activities, online and in-person. The Bakkavor Spain Technical Manager sat on the Board of ETF, reflecting the company's commitment to the organisation.

## MODERN SLAVERY TRAINING AND AWARENESS



**Bakkavor operational capacity building**

The Company continued to deliver its online modular training programme in FY25 to reach more colleagues across the group.

The following sessions took place:

Training Session	Numbers of Sessions
Modern Slavery Response Plan Team	2
Modern Slavery and Hidden Exploitation for SEF and Trade Union Reps	3
Modern Slavery and Hidden Exploitation for HR	2
Modern Slavery and Hidden Exploitation for Operations	4
Bakkavor Ethical Trade and Human Rights Programme for HR	2
Annual Modern Slavery Risk Assessment Process for HR	1
Responsible Recruitment Toolkit standards for recruiters	2
Customers & Human Rights for HR, Commercial, Procurement and Technical	1

Bakkavor’s ethical compliance consultant accessed Stronger Together and other ethical standards resources to ensure the Company had the most up to date information on tackling the issue of modern slavery and hidden exploitation which were built into training sessions.

**Stronger Together’s ‘Tackling modern slavery in UK businesses’ training course**

It was the Company’s policy to have at least one HR colleague per site attend this [external training course](#) every three years as a minimum.

**Effectiveness assessment**

To assess the impact of the steps taken, key performance indicators were reviewed and reported in Modern Slavery Statements. These KPIs support the focus on building capacity and awareness across the Group.

Key Performance Indicator	2017	2018	2019	2020	2021	2022	2023	2024	2025
Stronger Together Progress Monitoring Tool		48.6%	55%	65%	77%	77%	79%	79%	79%
Stronger Together Organisational Performance Assessment		43%			77%	77%	77%	79%	79%
% of Bakkavor sites with HR that have completed the Stronger Together training	89%	100%	100%	89%	100%	100%	74%	100%	100%
% of Bakkavor sites completed the Modern Slavery Risk Assessment	100%	100%	100%	100%	100%	100%	100%	100%	100%
% of Bakkavor sites completed the Stronger Together Tackling Modern Slavery in Business Implementation Checklist	89%	100%	100%	100%	100%	100%	100%	100%	100%
Number of Bakkavor Group Capacity Building Days	550	469	521	225	2205	715	607	211	994



Key Performance Indicator	2017	2018	2019	2020	2021	2022	2023	2024	2025
% of Bakkavor sites that have completed an agency audit every 12 months	100%	100%	100%	100%	100%	100%	100%	100%	100%
Number of cases received by the Whistleblowing hotline	105	67	69	51	42	21	41	20	22
% of 2025 Whistleblowing cases closed out	100%	100%	100%	100%	100%	90%	92%	95%	64% <sup>1</sup>
Stronger Together Good Practice Implementation Checklist				54%	65%	72%	77%	77%	82%
Modern Slavery Risk Rating					62%	63%	66%	71%	70%

**Progress against Stronger Together’s ‘Tackling Modern Slavery - Good Practice Implementation Checklist’**

Using this checklist, Bakkavor was able to monitor its year-on-year progress and measure its activities against the UN Guiding Principles Framework:

Steps	2020	2021	2022	2023	2024	2025
1. COMMIT to tackle modern slavery risk in your business	65%	85%	86%	87%	92%	95%
2. ASSESS - Understand the risks of modern slavery and hidden exploitation within your business	75%	82%	92%	93%	94%	95%
3. ACT - Take action to prevent and deal with identified risks	49%	52%	58%	61%	62%	75%
4. REMEDY - Protect and provide remedy for victims of exploitation	34%	64%	72%	72%	72%	78%
5. MONITOR - Monitor and review progress	66%	81%	80%	80%	80%	80%
6. COMMUNICATE - Tell people what you've done	71%	88%	88%	88%	88%	88%
<b>OVERALL SCORE</b>	<b>54%</b>	<b>65%</b>	<b>72%</b>	<b>77%</b>	<b>77%</b>	<b>82%</b>

Bakkavor’s overall score increased to 82%.



Bakkavor retained Stronger Together Business Partner ‘Advanced’ status for 2025.



Bakkavor retained Responsible Recruitment Advanced Business Partner Status in 2025.

<sup>1</sup> 8 cases were carried over to 2026. None were related to modern slavery or forced labour.