

MODERN SLAVERY STATEMENT

April 2026





INTRODUCTION

Modern slavery is a serious global issue and can take many forms, including forced or compulsory labour, servitude, slavery and human trafficking. It can occur across all sectors and throughout domestic and international supply chains.

Pilgrim Foodservice Ltd is committed to conducting its business responsibly and ethically and to taking appropriate steps to prevent modern slavery and human trafficking within our own operations and supply chains.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Pilgrim Foodservice Ltd during the financial year ended 30 April 2026 to identify, assess and manage the risks of modern slavery and human trafficking within our business and supply chains.

It builds upon the measures described in our previous Modern Slavery Statements and reflects our commitment to continually review and strengthen our approach.

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OUR BUSINESS, STRUCTURE AND SUPPLY CHAIN

Pilgrim Foodservice Ltd is a family-run foodservice business supplying a wide range of customers, including restaurants, cafés and public houses.

We manufacture fresh prepared vegetables and butchery products and distribute a comprehensive range of chilled, frozen and ambient goods, together with cleaning and disposable products. We are also a member of the Caterforce group, providing access to a wider network of suppliers and products.

Pilgrim Foodservice operates from its head office in Boston, Lincolnshire, with additional depots in Colchester, Dewsbury and Dereham. These locations support the distribution of products to customers across our operating regions.

We employ permanent full-time and part-time team members across a range of functions, including:

- warehousing and distribution;
- production;
- transport and driving;
- sales and customer support;
- procurement and buying;
- technical and quality;
- administration and support functions.

During periods of increased demand, we may also use temporary labour supplied through approved labour agencies.

We engage a range of third-party contractors and service providers to support our operations, including vehicle and equipment maintenance, facilities management and building repairs.

Our supply chain is diverse and includes local and UK producers and manufacturers as well as national and international suppliers. The nature and geographical reach of this supply chain means that the potential risk of modern slavery is not uniform and requires an appropriate risk-based approach.

Responsibility for preventing modern slavery is shared across the business. Our People team and senior management oversee employment and recruitment practices, while our Procurement, Buying and Technical teams play an important role in assessing and managing risks within our supply chain.

Our values of Innovation, Respect, Integrity and Trust continue to underpin the standards of behaviour we expect throughout our business and our relationships with suppliers and other third parties.

This develops the business and supply-chain description contained in the previous statement.



OUR POLICIES

Our policies and procedures provide the framework through which we seek to maintain appropriate employment standards, promote ethical working practices and reduce the risk of exploitation.

Relevant policies and procedures include:

- Modern Slavery Policy;
- Whistleblowing Policy;
- Recruitment and onboarding procedures;
- Grievance procedures;
- Equal Opportunities Policy;
- Supplier Management and Procurement Policy;
- Health and Safety procedures;
- Control of Contractors Policy; and
- Data protection policies and procedures.

Our Modern Slavery Policy sets out our commitment to preventing forced labour, human trafficking and other forms of exploitation. Team members are provided with access to relevant Company policies and are informed of the standards expected of them. Modern slavery awareness also forms part of our approach to induction and training.

The previous statement identifies these policies and the use of the Company's Quality Management System to make policies available to team members.

RECRUITMENT AND EMPLOYMENT PRACTICES

We recognise that responsible recruitment and employment practices are an important part of reducing the risk of labour exploitation.

Our recruitment processes are designed to ensure that individuals are recruited fairly and lawfully.

Our controls include:

- fair and consistent recruitment and selection processes;
- verification of an individual's right to work in the UK;
- payment of wages directly to an account held by the team member;
- compliance with applicable National Minimum Wage and National Living Wage requirements;
- provision of appropriate contractual terms and employment information;
- appropriate rest breaks, holiday entitlement and statutory employment rights;
- induction and health and safety training;
- access to grievance and whistleblowing arrangements;
- safe working environments; and
- a prohibition on forced and child labour.



Pilgrim Foodservice does not tolerate coercion, threats, forced labour or the inappropriate retention of workers' identity documents. Pilgrim Foodservice and its recruitment partners do not charge workers recruitment fees or require workers to make payments to secure employment.

Where external recruitment or labour agencies are used, we expect them to operate lawfully and in accordance with appropriate ethical employment standards.

Appropriate checks are undertaken before labour providers are approved, including verification of relevant licences or accreditations where these are required for the activities undertaken.

These controls build upon the recruitment safeguards reported in the previous statement.



RISK ASSESSMENT AND MANAGEMENT

We recognise that the potential risk of modern slavery varies depending upon factors including the type of work undertaken, employment arrangements, geographical location, product category and complexity of the supply chain.

Our approach is therefore based on identifying and applying appropriate scrutiny to areas where there may be greater vulnerability to exploitation.

During the reporting period, our consideration of modern slavery risk included our own employment practices, use of temporary and agency labour, third-party contractors and our wider supplier network.

Areas considered as part of our risk-based approach include:

- **Temporary and agency labour**

Workers supplied through labour providers can potentially be more vulnerable to exploitation, particularly where there are complex recruitment arrangements or multiple intermediaries.

- **Food and agricultural supply chains**

Certain areas of food production and agriculture can involve seasonal, temporary or migrant labour and may therefore present increased labour exploitation risks.

- **Imported products and international supply chains**

The geographical origin of products and the complexity of international supply chains can affect the level of visibility available over employment practices further down the supply chain.

- **Third-party contractors and service providers**

Contractors operating within labour-intensive services can also present potential risks that need to be considered as part of supplier and contractor management.

These areas do not necessarily indicate that modern slavery is occurring. They help us determine where greater scrutiny or due diligence may be appropriate. In the 2025/2026 year, we have not identified countries, product categories, suppliers or labour arrangements as higher risk during the reporting year.

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Our supplier base ranges from local producers to national and international organisations. We expect suppliers and business partners to operate responsibly and in accordance with applicable employment and modern slavery legislation. Our supplier due diligence includes the use of an Ethical Trading Questionnaire, which assists us in understanding suppliers' employment practices and identifying potential areas requiring further investigation or clarification. This process was already established and reported in our previous statement. Our Procurement, Buying and Technical teams work together, where appropriate, to consider ethical and supply-chain risks.

During 2025/26, we continued to review supplier practices and our approach to due diligence.

Number/percentage of relevant suppliers completing Ethical Trading Questionnaires: 100%

Number of suppliers requiring additional follow-up: 0

Number of modern slavery concerns identified through supplier due diligence: 0

Number of suppliers suspended or removed because of ethical/modern slavery concerns: 0

Where a potential concern is identified, we will seek further information and determine the appropriate action based upon the nature and seriousness of the issue.

LABOUR PROVIDERS AND AGENCY WORKERS

Where temporary labour is required, we use approved labour providers and undertake appropriate checks before and during our relationship with them.

Our approach includes consideration of the labour provider's recruitment and employment practices and verification of applicable licences or accreditations.

Where a Gangmasters and Labour Abuse Authority (GLAA) licence is required for the activities undertaken, we expect the relevant labour provider to hold and maintain the appropriate licence.

Agency workers have access to appropriate channels through which concerns can be raised and should receive the same protection from exploitation as individuals directly employed by Pilgrim Foodservice.



DUE DILIGENCE AND REMEDIATION

We periodically review our recruitment, induction and supplier management arrangements to identify areas where controls can be strengthened.

Where concerns about potential modern slavery or labour exploitation are identified, the appropriate response will depend upon the circumstances and the safety and welfare of any individuals potentially affected.

Our response may include:

- Investigating the concern;
- Seeking further information from a supplier or labour provider;
- Requiring corrective or remedial action;
- Increasing monitoring or due diligence;
- Escalating concerns internally;
- Obtaining specialist advice where appropriate;
- Engaging with the GLAA, police or another appropriate authority where necessary; and
- Suspending or terminating a commercial relationship where serious concerns are not adequately addressed.

Where possible and appropriate, we recognise the importance of remediation rather than automatically terminating a supplier relationship where doing so could negatively affect vulnerable workers.

The safety and wellbeing of any individual who may be experiencing exploitation will be an important consideration in determining our response.

The previous statement committed Pilgrim to working with first-tier suppliers on remediation before removing suppliers that failed to address identified issues.

RAISING CONCERNS AND WHISTLEBLOWING

We encourage team members and others working within our business to raise concerns about suspected unethical conduct, exploitation or modern slavery.

Concerns can be raised with a manager, the People team or through the Company's whistleblowing arrangements. Our reporting arrangements are intended to be accessible to our workforce, including agency workers.

Concerns relating to suspected modern slavery will be taken seriously and considered appropriately. Individuals raising genuine concerns should be able to do so without fear of retaliation or detrimental treatment.

Where there is an immediate risk to an individual's safety, appropriate external authorities or specialist organisations may be contacted.

Our previous statement confirmed that whistleblowing channels had been reviewed with the intention of ensuring accessibility to agency workers as well as directly employed team members.



TRAINING AND AWARENESS

A man in a white shirt and tie is standing and presenting to a group of people seated in the foreground. He is holding a tablet and gesturing with his hands. The background shows a modern office with large windows and a potted plant.

Awareness is important in helping our people recognise potential indicators of exploitation and understand how concerns should be escalated. New team members are introduced to our Modern Slavery Policy as part of the induction process.

Our People and recruitment teams receive appropriate guidance to help them recognise potential indicators of exploitation. These may include:

- an individual appearing to have limited control over their identification documents;
- evidence of coercion or intimidation;
- another person controlling an individual's wages or finances;
- unusual restrictions on an individual's movement or social interaction;
- indications that an individual has paid inappropriate recruitment fees or accumulated recruitment-related debt;
- unexplained dependency upon another individual for accommodation, transport or employment; and
- reluctance or inability to communicate independently.

Some of the managers and supervisors have received modern slavery awareness training to help them recognise and appropriately escalate potential concerns, building upon the training programme reported in the previous statement.

TRAINING COMPLETED DURING 2025/26

Modern Slavery forms part of the induction program for the business, and 101 employees have undertaken the training during this period.

Further training will be rolled out across the new Learning Management System to ensure all areas have been covered, and refresher training will be provided to maintain awareness.



MEASURING OUR EFFECTIVENESS

We recognise that policies alone do not demonstrate that modern slavery risks are being effectively managed. We therefore aim to assess the implementation and effectiveness of our controls and use the results to identify opportunities for improvement.

Our measures include, where appropriate:

- completion of modern slavery training;
- completion and review of Ethical Trading Questionnaires;
- labour-provider due diligence;
- supplier risk assessments and follow-up actions;
- concerns raised through whistleblowing and other reporting channels;
- modern slavery concerns identified through recruitment or employment processes;
- periodic review of relevant policies and procedures.

Where a measure is not currently captured centrally, we will consider whether improved monitoring would assist us in assessing the effectiveness of our controls.



PROGRESS DURING 2025/26

During the financial year ended 30 April 2026, we continued to develop our approach to preventing modern slavery and labour exploitation.

Key areas of activity included:

- Continuing supplier ethical due diligence through our Ethical Trading Questionnaire;
- Reviewing relevant recruitment and onboarding controls;
- Maintaining appropriate checks over labour providers;
- Continuing modern slavery awareness for relevant managers and team members;
- Maintaining accessible whistleblowing and reporting arrangements;
- Reviewing relevant policies and procedures;
- Considering higher-risk areas within our supply chain; and
- Strengthening the way in which modern slavery activity and effectiveness are monitored and reported.

A new internal platform is being created to streamline the process of supplier approval and supplier reviews. The Supplier Hub will allow suppliers to have their own login and provide all relevant information required before being submitted for approval and review. The Supplier Hub will also include a trending dashboard, allowing the business to gather and monitor specific trends in real time.

The platform will support our commitment to responsible and ethical sourcing by providing greater visibility of supplier information and supporting a more consistent approach to supplier due diligence. This will assist in the identification and management of potential risks relating to ethical trading, labour practices and modern slavery within our supply chain. The centralised system will also enable relevant supplier information and supporting documentation to be more effectively monitored and reviewed throughout the supplier relationship.

OUR PRIORITIES FOR 2026/27

We are committed to continuing to improve our approach to preventing modern slavery.
During 2026/27, our priorities will include:

1. Strengthening supplier risk assessment

Continue developing a proportionate, risk-based approach to supplier due diligence, with particular consideration given to higher-risk products, geographical locations and labour-intensive supply chains.

2. Improving supplier information

Continue to increase completion and review of Ethical Trading Questionnaires and ensure appropriate follow-up where responses indicate increased risk or require further clarification.

3. Developing training

Continue to strengthen modern slavery awareness across the business, including appropriate refresher training for relevant managers and employees.

We will use our Learning Management System to support the delivery, recording and monitoring of relevant modern slavery training.

4. Reviewing labour-provider controls

Continue periodic review of labour agencies and other labour providers to ensure appropriate recruitment and employment standards are maintained.

5. Improving measurement

Develop our use of management information and KPIs to enable us to assess trends, identify potential areas of increased risk and measure the effectiveness of the steps we are taking.

6. Continuous review

Continue to review our policies, procedures and controls in response to changes in our business, supply chains, legislation, guidance and emerging risks.

OUR COMMITMENT

Pilgrim Foodservice Ltd remains committed to conducting its business responsibly and to continually developing its approach to identifying and reducing the risk of modern slavery and human trafficking.

We recognise that preventing exploitation requires continued vigilance and collaboration between our people, suppliers, labour providers and other business partners.

Our approach will continue to evolve as our business and supply chains develop and as our understanding of modern slavery risks improves.

APPROVAL

This statement is Pilgrim Foodservice Ltd's Modern Slavery Statement for the financial year ended 30 April 2026.

This statement has been approved and signed by:

Charles J Bateman | Managing Director

Charles J Bateman

Pilgrim Foodservice Ltd Date: 25/10/2026





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(1) Ethical Trading Initiative Modern Slavery Statements; A Framework for Evaluation
www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Framework%20MSS%20Evaluation_v8_for%20publication.pdf