# Chief Executive Statement

The Monaghan Group recognises its responsibility to prevent slavery and human trafficking, and the example we must set within our industry.

Across our Group, we are committed to retaining the highest standards of employee welfare and safety. The Monaghan Group is committed to acting ethically, with integrity and transparency in all business dealings. This commitment is outlined in our training and company policies, which promote ethical behaviours. Our suppliers are aware that we do not tolerate any form of modern slavery, and we will work with them to ensure they are able to meet the standards required, and that the company's expectations are understood and upheld.

Our philosophy is 'We do the right thing' and we use it to drive every aspect of our business, from product, to process, to people.

Although we believe our actions have proven effective to date there is no room for complacency, and we remain vigilant to potential threats. We continue to review and adapt our approach to managing the risk of modern slavery within our business and supply chain.



Paul Wilson
CEO,
Monaghan

# Statement of Compliance

# Modern Slavery and the Supply Chain

**Introduction**

This statement is made in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps that Monaghan has taken and is continuing to take to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain. This statement relates to actions and activities during the reporting period 01 July 2025 to 31 June 2026.

Modern slavery includes slavery, servitude, human trafficking and forced labour. Monaghan has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We produce one Modern Slavery Statement for the Monaghan Group.

**Our Business**

Monaghan is one of the world's largest mushroom companies, established in the early 1980's. We are a family business with very strong values for people, customers, the environment and suppliers.

We are a vertically integrated agribusiness involved in all aspects of the supply chain from substrate production to growing, harvesting, packing and distribution. Headquartered in Co. Monaghan in Ireland, our operations span Canada, Ireland, the United Kingdom and Europe. We employ circa 2,300 people and supply fresh mushrooms to a number of major retailers across, the UK, ROI and Europe.

Our vision and purpose are underpinned by a strong set of values that describe what we stand for and how we behave within all our business dealings. Our underlying philosophy is 'We do the right thing' and we use it to drive every aspect of our business, from product, to process, to people. The Monaghan Group is committed to eliminating Modern Slavery and supporting the business and our supply chain to ensure all practices are ethical and in line with our business values.

**Ethical Organisation Memberships**

We are members of **SEDEX** (Suppliers Ethical Data Exchange). We are regularly audited by third parties who publish our audit results on the SEDEX portal. Our UK and ROI growing farms and packhouses are SEDEX registered and have completed the Self-Assessment Questionnaire (SAQ), providing a risk rating and have an independent audit to the SMETA standard. Actions to correct any non-conformances resulting from the audits are detailed by the site in a corrective action plan.

Monaghan is a member of the Association of Labour Providers (**ALP**). Labour providers play a vital role in the economy by supplying the essential workers to ensure our sites have the people they need to keep the nation supplied and fed. ALP promotes responsible recruitment and supports and represents its members so that labour provision in our sectors is recognised as a model of sustainable good practice.

We are members of **FNET** (Food Network for Ethical Trade), an initiative aiming to use collective leverage of suppliers and retailers to bring positive change to global supply chains by providing guidance, resources, training and opportunities for collaboration. We are also members of the **Seasonal Worker Scheme (SWS) Taskforce** for the UK. The taskforce's mission is to 'work collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers' rights in the UK Seasonal Worker Scheme (SWS) and wider UK horticulture.

Monaghan continues to be involved in working groups within each network.

**Our Policies**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have developed specific internal policies which address labour and human rights, promote best practice and establish confidential channels of communication for any concerns to be raised. These policies include:

**Human Rights** - Our human rights policy demonstrates our commitment to upholding human rights in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs), and the Ethical Trading Initiative Base Code (ETI Base Code).

This policy serves as a framework complementing our efforts to combat modern slavery and labor exploitation.

Monaghan is dedicated to respecting the dignity and rights of every individual. The company recognises its corporate responsibility for human rights and commits to continuous due diligence. Human rights education fosters values that empower individuals to uphold their own and others' rights, encouraging pride in ethical standards. Monaghan will not tolerate human rights abuses within its business or supply chains.

**Corporate Social Responsibility Policy** - Monaghan advocates corporate social responsibility across the business. The principles of CSR complement our corporate values and our philosophy of "We do the right thing".

**Recruitment and Selection Policy** - We operate a robust recruitment policy, including conducting checks on worker eligibility for all employees.

**Whistleblowing policy/Speak Up** - We operate a whistleblowing/Speak Up policy with a dedicated hotline, which is clearly communicated to all employees during their induction and throughout their employment with the company. This is to encourage workers to report any concerns about human rights violations or any other wrong doings within the business or supply chain. Any such reports will be taken seriously and thoroughly investigated.

**Ethical Trading Policy** - This outlines our aim to act responsibly in our commercial and trading activities whilst striving to ensure that the labour standards of our Supply Chain will meet relevant international standards. Monaghan applies the Ethical Trading Initiative (ETI) Base Code as a core standard for its company operations and its produce suppliers. All produce suppliers have been issued with an 'Ethical Trading Policy' and are required to comply with both local legislation and the ETI Base Code as a minimum requirement.

In addition to the above we have comprehensive policies in place for **Equal Opportunities, Dignity at work, Grievance** and **Disciplinary procedures.** We continually review our business and people policies to

strengthen our commitment and reduce the risk from any form of modern slavery taking place within the business or our supply chain.

**Risk Assessment**

We are operating in a sector that has relatively high risk of slavery and/or trafficking. We have a Human Rights Governance Group in place and we review our internal and external supply chain to evaluate human trafficking and slavery risks, identifying focus areas and informing our due diligence approaches.

We use our membership with and tools from SEDEX, ALP and FNET to support our Risk Assessment approach and subsequent due diligence processes.

As part of our ongoing strategy to identify and mitigate risk we have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Monitor potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.
- Promote best practice in tackling modern slavery and human trafficking.

We encourage and expect our suppliers and labour providers to comply with best practice in tackling modern slavery and human trafficking. Monaghan guides, supports and advises our supplier and labour providers where required.

**Responsible Sourcing**

Through our Human Rights Governance Group we have identified and categorised our suppliers based on risk.

We operate a live supplier approval procedure and risk assessment process, with a more in-depth approach for our preferred suppliers in key categories (e.g. Growers and Transport).

Suppliers in these key categories are required to complete a detailed supplier questionnaire covering quality, food safety and human rights standards, among other areas of importance.

We have processes in place for auditing and assessing our preferred/key suppliers and take a risk-based approach to auditing these. Should we identify or become aware of any business relationship not adequately managing their potential or actual modern slavery risk we follow up accordingly.

**Labour Providers/Agencies**

As a business we employ workers on direct contracts. However, on occasion we may use agency workers for skilled workers (e.g. lorry drivers and maintenance). In the event we decide to use agencies, we only do so after the agency has gone through a process of agreeing terms and being risk assessed. We would also ensure that all agencies where required hold a GLAA license.

If we make use of an agency, we only use agencies with a good reputation and who are listed as preferred suppliers. In the event that we identify an employment agency is not adhering to standards we will remove them from the preferred supplier list and not engage any further with them.

**Due Diligence Processes**

We regularly conduct random **ethical audits** across our sites to ensure good practice in identifying, deterring and tackling hidden labour exploitation throughout the business in a consistent manner. To help, we display awareness posters around our sites (in canteens, toilets, offices, etc.). Furthermore, we systematically check addresses of workers for high occupancy of houses, we check bank details to ensure that unrelated workers are not being paid into the same bank account, and we also check next of kin/emergency contacts, acting accordingly on the information.

As part of our **interview process**, we ask questions to ensure candidates are not victims of forced labour or human trafficking. We communicate that we do not charge any fees for a job with our company, and we do not permit anyone, whether an individual or an agency, to charge for services related to securing a job at any stage of the recruitment process, other than approved charges which are clearly documented e.g. visa.

Monaghan is committed to ensuring transparent recruitment practices and minimising the risk of recruitment fees. If fees are found to have been charged, we are committed to understanding fees, supporting individuals, reporting to relevant authorities and taking appropriate action. We continue to review and adapt our approach in this area and have developed new strategic partnerships to allow us to deepen our understanding of recruitment practices in different regions.

**Right to work checks** are completed for all employees in the business and personnel completing these checks are suitably trained.

We signpost employees on all our UK sites to the **Just Good Work App**. Just Good Work is an important tool to help ensure everyone in our supply chain receives the same information on rights and responsibilities in the workplace.

We regularly communicate our **Speak Up** policy and helpline to all employees and monitor use of this.

**Training**

Training is an important way of raising awareness and ensuring that people understand what modern slavery is and what they need to do if they encounter something that raises concerns. Members of our Human Resources Department, along with operational managers from all our sites, have attended workshops through Stronger Together. In addition to Stronger Together training we carry out the following;

- Induction training
- In house training for managers
- Regular Toolbox Talks with employees to maintain awareness
- Training for employee representatives

We also require our Produce Growers to attend Stronger Together courses.

**Our Performance Indicators**

Monaghan has developed key performance indicators (KPIs) to monitor the effectiveness of the steps it is taking regarding slavery and/or human trafficking. Theses KPIs include:

| Key Performance Indicator | 2026 |
|---|---|
| Number of UK/ROI sites with a representative who has attended Stronger Together Training | 100% |
| % of Enhanced internal human rights site audits completed (new - in addition to SEDEX, desktop audits and existing controls) | 65% |
| % of produce suppliers that have an up-to-date ethical risk assessment | 100% |
| Number of whistle blowing/speak up cases relating to Modern Slavery | 0 |
| Number of suspected cases | 0 |
| Number of confirmed cases | 0 |

**Remediation**

We have a Human Rights Remediation Policy in place to ensure that our workers and those in our supply chain have access to effective remedies in the event of adverse impacts arising from our business activities. Since the signs and root causes of forced labour are varied, the investigation and corrective actions need to be tailored to the circumstances on a case-by-case basis.

**Further Steps**

Over the next 12 months we will continue to build on the progress we have made and continue to uphold our commitment to addressing modern slavery risks within our business/supply chain. Our focus areas are.

- Continue to develop new strategic partnerships to allow us to deepen our understanding of recruitment practices in different regions
- Human Rights Governance Group – continue to review approach to Human Rights in our supply chain, ensuring improvements year on year.
- Continue with the rollout of enhanced human rights due diligence

**Approval for this Statement**

This statement has been approved by the Board and signed by Paul Wilson, CEO, on 15th October 2026. It will be reviewed and updated annually.