

pladis (UK) Limited Modern Slavery Statement

2025 Financial Year





pladis (UK) Limited Modern Slavery Statement 2025

Statement Summary

This is our seventh Modern Slavery Statement. It has been prepared by pladis (UK) Limited in accordance with section 54 of the Modern Slavery Act 2015 regarding our fiscal year from 1st January 2025 to 31st December 2025 ("FY25").

This statement covers all the company's UK activities and sets out the steps we take to prevent modern slavery occurring within our business and supply chains. Our purpose is to build a better working world; this includes a commitment to conduct our business ethically and to deliver responsible growth that is inclusive for all. In accordance with pladis (UK) Limited's Global Human Rights Policy, we will not tolerate any form of human rights abuse, including modern slavery or human trafficking, in any part of our business or within our supply chains.

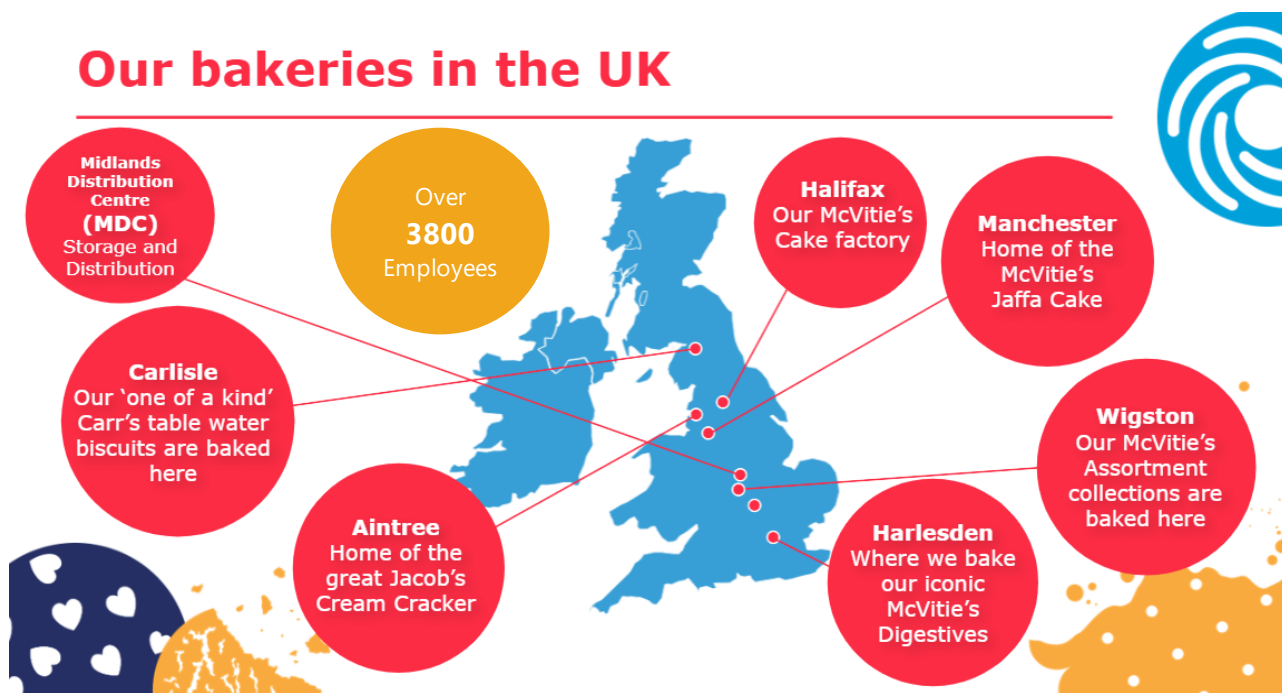
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1. Business Organisation and Structure

pladis was formed in 2016 and is the proud steward of more than 300 years of family baking and confectionery experience. As one of the world's leading snacking companies, it is home to beloved brands including McVitie's, Ülker, Jacobs and Carr's. Within the pladis (UK) Limited business, there are over 3,800 employees across six bakeries and one distribution site.

Our bakeries in the UK



2. Our Processes and Policies

We have several policies that help us manage our modern slavery risk. These enable us, and our stakeholders, to be aware of our responsibilities when responding to issues or concerns and help us to have a joined-up approach in tackling the threat of modern slavery.

We take our role in protecting and promoting human rights seriously and understand that societies in which human rights are respected and protected, enhance the wellbeing of citizens and allow business to flourish. We operate to ensure that we as a company, our employees, contractors and our suppliers respect international human rights standards through the policies outlined below. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery, human trafficking, forced or compulsory labour and child labour is not taking place anywhere in our own business or in any of our supply chains.



2.1 Code of Conduct

We operate according to the pladis Code of Conduct which captures the most important responsibilities expected of our colleagues as they go about their work. We do not tolerate abuse of human rights in our operations throughout our business.

2.2 Whistleblowing Policy

pladis (UK) Limited operates a Whistleblowing Policy which encourages colleagues (including agency workers and contractors) to report any circumstances of potentially unethical conduct within our organisation. In 2025, the Whistleblowing Policy continued to be communicated to all our manufacturing sites and distribution centre.

2.3 Human Rights Policy

pladis (UK) Limited's Human Rights Policy establishes the fundamental principles and minimum standards that govern our approach to human rights, including the provision of humane and safe working conditions, the promotion of non-discrimination, and the prohibition of forced and child labour. We are committed to fostering a working environment that respects the human rights of all individuals in line with internationally recognised standards, where colleagues are supported to develop professionally, are free to express their views, and are not subject to discrimination of any kind.

The pladis (UK) Limited Human Rights Policy is underpinned by internationally recognised frameworks and standards, including the Universal Declaration of Human Rights, the United Nations Global Compact, the UN Convention on the Rights of the Child, International Labour Organization (ILO) Conventions, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and applicable national legislation.

2.4 Ethical Policy Statement

pladis (UK) Limited Ethical Policy Statement plays a foundational role in the eradication of modern slavery by setting clear expectations, standards, and accountability for how our organisation and supply chain must operate.

This statement is based upon the Ethical Trading Initiative (ETI) Base Code which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice. This statement sets out the practices that, as a minimum, we will adhere to:

1. Employment is freely chosen.
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour shall not be used.
5. Living wages are paid.
6. Working hours are not excessive.



7. No discrimination is practiced.
8. Regular employment is provided.
9. No harsh or inhumane treatment is allowed.
10. Safeguarding within the supply chain.

In addition to our Ethical Policy Statement we also have a Modern Slavery Remediation Policy and in 2025 we expanded on this by developing a Child Remediation Policy. Both outline our procedures for addressing problems and focusing on correcting any identified issues.

2.5 Supplier Ethical Data Exchange (SEDEX)

pladis (UK) Limited is a member of SEDEX, the global Supplier Ethical Data Exchange, a non-profit platform that supports ethical due diligence and supply chain transparency. SMETA, the SEDEX Members Ethical Trade Audit, is the most widely recognised social audit standard and is used to assess working conditions across sites and suppliers. In 2025, all six UK bakeries and the central distribution facility were SMETA approved through audits conducted in line with our required frequency, confirming alignment with industry standards and providing transparency to stakeholders.

In addition, pladis (UK) Limited completes bi-annual SEDEX self-assessment questionnaires for all UK manufacturing, office, and distribution sites, with information shared across the SEDEX network. This approach supports compliance with the Modern Slavery Act and strengthens our efforts to prevent modern slavery within our operations and supply chain.

pladis (UK) Limited has also completed an EcoVadis assessment. EcoVadis is a globally recognised sustainability ratings platform that evaluates environmental, labour and human rights, ethics, and sustainable procurement performance.

2.6 Audit Process of Subcontractors

We recognise that the use of temporary labour and contractors presents an elevated risk. To mitigate this, pladis (UK) Limited operates a robust annual auditing programme that assesses business practices, compliance with policies, and alignment with externally recognised ethical guidelines and national standards. This process is applied across all UK manufacturing and distribution sites and covers all temporary labour agencies as well as permanent site-based contractors, including external hygiene and security providers. All labour providers engaged by pladis (UK) Limited are required to comply fully with applicable UK legislation.

3. Supply Chain Due Diligence & Transparency

pladis (UK) Limited is committed to ensuring transparency within its own operations and in its approach to addressing modern slavery across its supply chains. This commitment is articulated through our Supplier Code of Conduct, read in conjunction with our Human Rights Policy, which reinforces our zero-tolerance approach to modern slavery and human trafficking. Where appropriate and proportionate to the level of risk, we incorporate contractual requirements obliging contractors, suppliers, and other business partners to comply with applicable anti-slavery and anti-trafficking legislation. We also expect our suppliers to apply equivalent standards throughout their own supply chains.



pladis (UK) Limited maintains a preferred supplier list and undertakes due diligence on all suppliers prior to approval. Compliance with our Human Rights Policy and Supplier Code of Conduct forms a mandatory requirement for all suppliers, and we seek assurance that no aspect of their business operations is inconsistent with these standards.

We recognise the importance of close collaboration with suppliers to promote responsible business practices. As a condition of doing business with pladis (UK) Limited, raw material suppliers, packaging suppliers, key service providers (including laundry, warehousing, and hygiene contractors), and agents are required to hold membership of SEDEX or an equivalent internationally recognised scheme, with EcoVadis being the preferred alternative. Additionally, suppliers must have completed a SEDEX self-assessment questionnaire within the last two years. Through our quarterly Ethical Steering Committee meetings, we utilise the SEDEX risk assessment tool (RADAR) to identify and review higher-risk suppliers and to engage proactively with them to mitigate identified risks.

4. Sustainability

It is well founded that sourcing sustainable ingredients is intrinsically linked to a supplier's ethical credentials, particularly for those ingredients associated with socioeconomic and environmental issues, such as palm oil and cocoa. Utilising sustainable ingredients and ensuring the implementation of ethical practices within their supply chains ensures vulnerable farmers and communities are treated fairly with dignity and respect and that they receive fair prices for their valuable commodity. Sustainably sourced materials, therefore, generally deliver both environmental and ethical benefits. pladis (UK) Limited has a robust sustainability strategy in place with annual improvements planned, measured, and reported on key sustainable challenges. In 2025 pladis (UK) Limited introduced a global sustainability strategy encompassing our plans as a global business.

4.1 Sustainable Material Sourcing

In 2025, pladis (UK) Limited continued to advance its responsible palm oil programme, reaffirming its long-standing commitment to sustainable sourcing. pladis are a member of the Roundtable on Sustainable Palm Oil (RSPO) and 100% of the palm oil used supports RSPO sustainability standards. Since 2018, we have partnered with the Earthworm Foundation to deliver targeted programmes across our palm oil supply chain, supporting improvements in environmental and social practices.

Furthermore, we maintain partnerships with cocoa and soy sustainability certification bodies, including Rainforest Alliance, RTRS and Fairtrade, and manufacture a number of products in line with these standards whereby participating farms, communities, and businesses are audited against robust environmental, social, and economic criteria.

In 2025 we launched the Sustainable Materials - Supplier Requirements policy which, in conjunction with our NDPE (No Deforestation, Peatland Development and No Exploitation) policy, covers all pladis operations, suppliers, and business partners worldwide involved in the production, processing, and distribution of our primary forest risk commodities recognised for their contribution to global deforestation risk and the degradation of ecosystems:

- Cocoa (cocoa beans and all related components including raw, semi-or finished forms)



- Palm
- Sugar Cane
- Pulp & Paper (Corrugated, Paperboard, Flexible Paper)

5. Capacity Building through Employee Ethical Training

We recognise that our modern slavery strategy can only be effective if we educate our staff and communicate effectively on its importance. Code of Conduct, Human Rights and Modern Slavery training completion is mandatory and monitored across the business. We also monitor and categorise all concerns reported to us (either via our whistleblowing service or any other channel) and take appropriate action.

6. Social Dialogue

pladis (UK) Limited maintains an ongoing social dialogue to support the eradication of modern slavery by engaging proactively with both internal and external stakeholders. We continue to strengthen this dialogue through close collaboration with our trade union partners, providing regular updates on progress and key initiatives during quarterly consultation and communication forums. This approach ensures transparency, accountability, and collective engagement in addressing modern slavery risks across our operations and supply chains.

In addition, we actively support and collaborate with several reputable not-for-profit and industry organisations, including Stronger Together, Supplier Ethical Data Exchange (Sedex), EcoVadis, the Association of Labour Providers (ALP), Roundtable for Responsible Soy (RTRS), Roundtable on Sustainable Palm Oil (RSPO), Rainforest Alliance, and Fairtrade. Through these partnerships, we enhance our due diligence processes, share best practices, and contribute to broader, cross-sector efforts aimed at preventing exploitation and promoting ethical labour standards.

7. Future Plans

- ❖ Employ external resources to complete the following tasks relating to supplier ethical assessment:
 - 100% of suppliers in scope to hold a Sedex or an equivalent membership of an internationally recognised scheme, Ecovadis being the preferred alternative
 - All Sedex linked suppliers to have an SAQ updated in the last 2 years
 - Using the Sedex Radar tool and based on the Sedex criticality ratings (inherent risk and site risk combination), identify high risk suppliers and the rationale. Liaise with suppliers to improve their scoring and reduce the risk.
 - Increase the proportion of in-scope suppliers completing a 2-pillar or 4-pillar SMETA audit by 10% from 2025 baseline results.
- ❖ Continue to utilise the UK Government's Modern Slavery Assessment Tool (MSAT) where deemed necessary; making sure high-risk suppliers are obligated to complete a submission and that the response and associated improvement actions are addressed.
- ❖ Complete the UK Government's Modern Slavery Assessment Tool (MSAT) for our own

operations and address any identified opportunities for improvement.

- ❖ pladis (UK) Limited will, where applicable, adhere to the principles and requirements of the European Union Deforestation Regulation (EUDR), aligning its sourcing and supply chain practices with the legislation's objectives to prevent deforestation and promote ethical, traceable, and sustainable supply chains.
- ❖ Review and improve our agency/contractor internal audit template to align with SMETA 7.0 requirements and highlight opportunities to remove the risk of modern slavery.
- ❖ Launch the Happy People Happy Planet strategy, with the aim of empowering colleagues, communities and partners through inclusion, opportunity and food.
- ❖ Continue our commitment to building an inclusive, diverse, and equitable culture, which respects local differences and backgrounds and where people can be themselves. Deliver on our pledge to continue to support the various internal working groups, initiatives, and schemes to promote inclusivity, diversity, and equity.

The Board of pladis (UK) Limited has reviewed and approved this statement and it has been signed on their behalf.

A handwritten signature in black ink, appearing to be "Mete Buyurgan", written in a cursive style.

Mete Buyurgan
Managing Director, pladis (UK) Limited