

1. Organisation structure and supply chains

Fullers Foods International (The Company) is one of the largest suppliers of frozen foods to the UK market, specialising in the development and procurement of retail ready to cook and ready to eat products across multiple categories and temperature bands. We supply more than 1,200 products from core categories including chips, potatoes, vegetables, seasonal party food, ready meals, fruit, desserts, poultry, and bread. The companies' headquarters are in Leeds, England and has approximately 100 employees. We are an AA rated BRCGS agent and broker of frozen, chilled and ambient products including the management of services relating to storage, distribution, importation and exportation.

Human rights oversight sits at senior leadership level with representation cross functional departments and the Chief Executive Officer. Operational responsibility is led by the Technical Director and supported by the Head of Compliance and ESG, and the Senior ESG Manager. The ESG team monitors social audit compliance and supply chain performance, with key risks and emerging issues reviewed quarterly by a risk committee. Allegations of modern slavery or forced labour are jointly managed by the Head of Compliance and ESG Manager and Technical Director, in collaboration with suppliers and, where appropriate, customers to ensure appropriate resolution. Our human rights priorities are guided by the 2024 materiality assessment and delivered through ESG workstreams overseen by a senior steering group.

The business is structured across five core functions: procurement and operations, commercial, technical, finance, and product development. During the reporting period, two in-country consultants were engaged in Thailand and Australia. Our growth strategy includes a focus on supply base diversification, market expansion, acquisitions and global customer relationships. Separately from our supply chain risk assessment, we assess the risk of modern slavery within head office locations as low.

We maintain direct relationships with over 100 tier one suppliers across approximately 20 countries. Finished products are procured and distributed via approved cold storage and logistics networks, primarily managed through a key partner in Corby, England, with capacity for up to 40,000 pallets. We deliver around 34 million cases annually to more than 240 UK locations. Products are mainly sold through UK and Ireland retail channels, with additional distribution into foodservice, business-to-business, and branded retail and foodservice markets.

Labour models across our tier one suppliers vary by scale, capability, and production approach, ranging from highly automated facilities to more labour-intensive operations. Workforce composition, recruitment methods, and employment arrangements also differ across sites.

Data obtained from SEDEX suggest across the supply chain, there is an estimated 40,000 workers, with approximately 80% locally sourced and 20% migrant. Around 85% are directly employed, with the remainder engaged through agency, temporary, or seasonal arrangements. Recruitment is broadly split between direct hiring and use of labour providers, with limited participation in formal seasonal or guest worker programmes. While tier two sites are outside the scope of our direct compliance processes, we expect tier one suppliers to cascade our human rights standards throughout their own supply chains.

2. Policies

We require all supplier partners to comply with our Ethical and Labour Standards Policy, taking responsibility for human rights within their operations and extended supply chains. The policy sets out minimum expectations aligned with local legislation and international standards, including the ILO and ETI Base Code, and is formally accepted during onboarding. It is reviewed annually, or as required, and approved by the CEO. To further strengthen our approach, a supplier code of conduct (COC) will be introduced alongside the existing policy.

Sites are obligated to review and address areas such as worker engagement, grievances, whistleblowing, audit requirements, and human rights commitments, including the publication of a modern slavery statement (in-scope UK businesses). Mechanisms should be developed in line with the UN Guiding

Principles for a consistent and effective approach. This is distributed electronically at the time of business confirmation and acceptance is recorded with each new version.

We expect supplier partners to maintain open and transparent communication on audit scheduling, completion, non-compliances, and continuous improvement. The COC sets out requirements for routine audits based on risk. The use of child, forced, or bonded labour, and any form of abuse or harassment, is strictly prohibited and treated as a significant finding. Supplier partners must notify Fullers Foods within 48 hours of any such issues, with supply paused until effective corrective actions are in place. We follow the 'UK Food Supply Chain Serious Incident Escalation Protocol' in the event of a serious incident.

3. Risk assessment and management.

We use the RADAR tool within SEDEX to understand the inherent and site level risks presented by a supplying site. RADAR incorporates a number of global indicators to generate a risk rating such as the ITUC Global Rights Index, the Forced Labour Index, and the Global Health Security Index. Our internal risk assessment is multifactored and uses the following data set to generate a result by supplying site:

- Sedex SAQ score
- Sedex RADAR score
- location of factory (country)
- production volume to Fullers
- commercial value to Fullers
- product type
- social compliance history
- engagement with Fullers Foods

We classify site risk into low (green), medium (amber) or high (red) enabling easy identification, reporting, and consistency in terminology with retail customers. Each level of risk dictates a different compliance and monitoring requirement. Low risk sites will require routine desktop SAQ completion and audits every 4 years whereas high risk sites are expected to conduct SAQ completion alongside annual audits and may also be asked to conduct in depth due diligence. In comparison to 2024, the risk ratings have changed as follows: high risk sites have reduced by 33% from 15 to 10, either due to downgrading or delisting. The number of medium risk sites increased by 5% from 44 to 46 and low risk sites also decreased by 4%, from 23 to 22. A total of 26 sites are out of scope; these include storage and distribution businesses, printer and packaging suppliers and corporate offices. We manage conflicting risk ratings across our customer base by assuring the sites follow the highest standard. In 2025, 69 audits were conducted, an increase from 54 the year before. Total number of NCs has increased from 295 to 345. Analysis of the non-compliances raised through these audits identifies working conditions and safety as the most common risk areas, followed by excessive working hours and thirdly responsible recruitment. A total of 33 CARs were raised; 25 of these were code area 5.A 'living wages are paid', followed by 1.A 'responsible recruitment' and then 7 'no discrimination is practiced'. No clear trend identified by sourcing country.

Based on our internal risk assessment, we have identified supply chains in Asia, in particular Vietnam, Thailand and China as being high risk due to inherent factors. Certain all year-round supply chains in the UK have been denoted as higher risk due to either labour standards and health and safety risk indicators, or through lack of engagement or poor audit outcomes. The outcomes and grading of audits are communicated to sites alongside their risk rating. We continue to develop our risk assessment process and review the needs of the business and customer requirements. We have increased activity within food service and branded ranges, although not significantly, but as a developing area we move to look at strengthening visibility using SAQs and an improved screening process.

We continue to deliver key actions of our ESG strategy, in particular our transparent supply chains workstreams which focuses on strengthening visibility and engagement with our supplying partners. In terms of prioritising risks and actions we are going to be engaging our strategic partners who supply the majority of our volume. We acknowledge that to our supplier partners we may be one stakeholder

amongst higher priority customers and so leverage is an important factor. By focusing on the small number of strategic partners, we intend to foster strong relationships that are mutually beneficial and face into a high-risk collective. Where we source the seasonal products from sites in Vietnam, we maintained focus on going beyond compliance and completed the first human rights due diligence visit in November 2025. Both manufacturing facilities and the prawn farm were visited in partnership with a UK retailer with a view to ongoing due diligence and enhancing standards.

One concession was issued during the reporting period to cover a supplying partner who packed product with outstanding critical NCs. This concession covered three production runs and expired in November 2025. Preventative action includes the site undertaking a routine audit against the SMETA 7 methodology when retail business volumes become stable.

4. Due diligence

Supplier partner onboarding follows a two-stage process overseen by the Technical and Business Development Directors. Initial screening assesses key sustainability and ethical risk factors, followed by a detailed self-assessment covering business structure, supply chains, governance, and compliance. Expectations are clearly communicated, with support provided to meet customer requirements.

All supplier partners are evaluated at the outset using a risk matrix incorporating country and sector data, alongside product type and spend. Audit performance and supplier engagement inform an overall site risk rating, ensuring a proportionate approach to due diligence.

Compliance is monitored through SEDEX, requiring full SAQ completion and audit transparency. Retail-facing supplying partners undergo SMETA audits at least every four years, with high-risk sites subject to annual semi-announced audits by APSCA companies. SEDEX reporting is used to identify trends and prioritise higher-risk sites. During the reporting period, 52% of sites completed a SMETA audit and SAQ compliance reached 95%. Site visits and cross-functional support reinforce audit preparation, corrective actions, and supplier engagement. We are strengthening visibility beyond tier one by mapping tier-two sites, prioritising higher-risk manufacturing. This is supported by tools such as Authenticate and supplier engagement to align mapping efforts and reduce duplication. While oversight beyond tier one is indirect, we manage demand forecasting, supplier communication, and contingency planning to mitigate labour risks and support responsible working conditions across the supply chain.

Fullers Foods operates a structured human rights due diligence (HRDD) framework supported by recognised tools and industry collaboration. Tools such as Stronger Together 360°, the Responsible Recruitment Toolkit, EcoVadis, and Authenticate are used to assess maturity, identify risks, and define clear improvement actions. These are complemented by the FNET HRDD form, which provides a consistent approach to assessing both our business and selected suppliers.

Our approach is strengthened through external collaboration and shared intelligence. Engagement with industry bodies and membership organisations enables access to data, insights, and emerging risk information, which we also share with key suppliers to support their due diligence efforts. Recognising that systemic human rights risks require collective action, we provide training, best practice guidance, and networking opportunities to build supplier capability.

Through active participation in FNET, including member calls, working groups, and industry forums, we contribute to and benefit from shared learning and practical risk mitigation strategies. Additional insight is gained through multi-stakeholder initiatives such as MSIN and ETI, alongside regular horizon scanning, ensuring we remain informed of key human rights issues across global supply chains.

We continue to prioritise moving beyond audit-based compliance towards a model of continuous improvement. Enhancing reporting capabilities to identify trends in non-conformances, including by site type and sourcing region, is a key focus. Due diligence requirements are increasingly integrated into audit preparation processes, particularly ahead of SMETA 7 audits, supporting suppliers to demonstrate actions taken or to identify and address gaps proactively. This approach, while evolving, is driving greater engagement and ownership among supplier partners.

Suppliers operating within the UK are expected to appoint a trained lead and utilise available self-assessment tools to benchmark performance and proactively address labour-related risks. For international partners, we encourage participation in relevant regional initiatives, such as the Spanish Ethical Trade Forum, where applicable. To ensure accessibility, we also provide tailored resources, including a forced labour awareness course designed for sites with limited capacity or budget. During the reporting period, twelve strategic supplier partners were engaged to initiate the HRDD process through completion of the FNET assessment. Four partners successfully completed the process, each agreeing up to three actions for implementation over the following year, after which assessments will become annual. Engagement across the wider supplier base has varied, with some assessments delayed or postponed, and reduced follow-up engagement noted among the initial 2024 cohort.

Where specific risks or allegations of human rights violations are identified, these are investigated on a case-by-case basis in collaboration with relevant suppliers, with any compliance breaches reported to customers as appropriate. We also work with external consultancy support, including Practical Ethics, to strengthen internal management systems and enhance risk assessment processes. Relevant legislative developments and guidance on labour practices are communicated to suppliers to support compliance and continuous improvement.

Finally, we maintain regular engagement with customers through retailer conferences and ongoing communication, providing updates on compliance performance and key due diligence initiatives. This ensures transparency and alignment with customer expectations while reinforcing our commitment to responsible sourcing and ethical trade.

5. Remediation and grievance mechanisms

We recognise that effective grievance and remediation mechanisms are essential components of a robust human rights and modern slavery programme. While our existing whistleblowing and grievance procedures provide routes for raising concerns, we acknowledge that further development is required to ensure that potential cases of modern slavery or labour exploitation can be identified, investigated, and remediated consistently and effectively. We require all employees to raise any concerns by following our whistleblowing procedure which has both an internal officer and an external independent contact. In 2025 the mechanism was reviewed for effectiveness, and this remains a priority as the business grows in scale. We will focus on establishing a clearer remediation framework that defines roles, responsibilities, escalation pathways, and appropriate remedies where adverse impacts are identified.

Our policy states that supplier partners have grievance procedures that follow the UNGP’s “effectiveness criteria” for non-judicial grievance mechanisms. We expect all workers within supplier facilities to have access to, and understanding of, the grievance and reporting channels available to them through their employer. Where applicable, workers should also be made aware of any additional reporting mechanisms provided by retail customers or other relevant stakeholders, ensuring multiple avenues are available for raising concerns safely and without fear of retaliation.

6. Key Performance Indicators

Key Performance Indicator	Y 2023	Y 2024	Y 2025
Development and implementation of policy	100%	100%	100%
% of relevant colleagues trained	20%	40%	37%*
Number of supplier partners registered on SEDEX	100%	100%	100%
Number of supplier partners with compliant SAQs	86%	87%	95%
Number of supplier partners that have accepted and are abiding to the Fullers Ethical and Labour Standards Policy	58%	68%	69%

Number of non-compliances raised in ethical audits identifying modern slavery issues	0	0	0
Number of modern slavery incidents reported in the supply chain through non-audit channels	0	0	1**
Number of UK supplier partners (meeting legal requirement) have published a modern slavery statement	100%	100%	100%
Number of times a grievance mechanism was used	0	0	0
Number of times a whistleblowing mechanism was used	0	0	0

*The percentage reduced slightly due to business growth and onboarding of new colleagues during the reporting period

**One alleged labour exploitation incident was reported through a non-audit channel. The matter was investigated in collaboration with the supplier partner and relevant stakeholders. Appropriate corrective actions were agreed and implemented.

7. Training

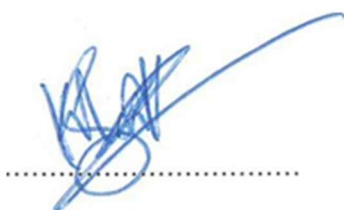
Responsibility for implementing HRDD sits with the Senior ESG Manager and Technical and Ethical Administrator, both of whom have completed advanced modern slavery awareness training. This capability is further reinforced across the business through targeted training for colleagues who maintain close relationships with supplier sites.

Training programmes are reviewed periodically and delivered through a structured three-year plan to ensure that commercial, technical, and development teams have an increased awareness of risks. To strengthen internal engagement an additional Technical Manager has been appointed as a 'Treat Fairly' champion, providing practical guidance for the Technical team. The annual campaign for anti-slavery week was launched in October through a formal and interactive internal communication to all colleagues. As part of the new colleague induction process, an introduction to ESG and salient human rights risks is trained out. In addition, to support colleagues with the right language and skills to understand risks more clearly we are looking to deliver short internal sessions. These courses are developed according to the particular needs of the department, individual or product type. This reporting period we have completed the following:

- SEDEX Building strong forced labour due diligence in October
- Stronger Together Grievance Mechanisms in November
- Stronger Together Eliminating worker paid recruitment fees in September and December
- Stronger Together Advanced Tackling Modern Slavery in January

Training is completed at a supplying site level dependant on customer requirement. Any bespoke training on forced labour is created by Fullers on behalf of a supplying site where access to workshops and courses is not yet feasible.

Signed



CEO Kevin Smith