



Slavery and Human Trafficking Company Statement

Introduction

This statement sets out Albert Bartlett's actions to understand and address potential modern slavery risks within our business and supply chains and outlines the measures we have taken to prevent slavery, human trafficking, forced labour and hidden labour exploitation.

This statement relates to the financial year ending 2026 and is published in accordance with Section 54 of the Modern Slavery Act 2015.

As the UK's leading supplier of potatoes, Albert Bartlett recognises its responsibility to take a robust and transparent approach to tackling modern slavery risks. We remain committed to protecting the rights of workers, promoting ethical recruitment and ensuring that our operations and supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

Albert Bartlett is a family-owned business and one of the UK's leading supplier of potatoes, working with a network of farmers and growers across the British Isles and selected international growing regions. The business employs more than 1,500 colleagues across sites in Airdrie, Boston, Westwick, Jersey and Cornwall.

Our supply chain includes growers, labour providers, packaging suppliers, logistics providers, contractors, service providers and other suppliers supporting our operations.

Governance and Risk Assessment

Albert Bartlett continues to assess modern slavery risks through a structured approach focused on labour standards, responsible recruitment, human rights due diligence and ethical sourcing.

Albert Bartlett supplies both own-label and branded products to leading UK retailers and is subject to a range of customer ethical trading, responsible sourcing and human rights standards. Compliance with these expectations is assessed through customer oversight activities, SEDEX participation, SMETA audits and ongoing due diligence processes, helping to drive continuous improvement in responsible recruitment, labour standards and the prevention of modern slavery.

Key elements of our risk management process include:

- Supply chain mapping and monitoring through SEDEX and supplier due diligence programmes.
- Regular SMETA audits across operational sites.
- Internal and external labour provider audits.
- Agency worker interviews and workforce engagement activities.
- Quarterly employee record reviews for indicators of modern slavery.
- Enhanced right to work compliance monitoring through RightCheck.
- Cross-functional oversight through our Ethics Focus Group.

Policies and Procedures

Our commitment to preventing modern slavery is supported by a comprehensive framework of policies and procedures, including:

- Human Rights Policy
- Ethical Trading Policy
- Responsible Recruitment Policy
- Managing Agency Policy

Slavery and Human Trafficking Company Statement

- Whistleblowing Policy
- Equal Opportunities Policy
- Remediation Policy
- Sustainable Procurement Policy
- Tackling Modern Slavery and Hidden Labour Exploitation Policy

These policies are regularly reviewed to ensure alignment with legal requirements, ethical trading expectations and best practice guidance.

Due Diligence Activities During 2026

Responsible Recruitment

We continued to strengthen our responsible recruitment practices during the year.

The business maintained a programme of labour provider compliance audits covering recruitment practices, worker records, right to work compliance, induction arrangements, whistleblowing awareness and modern slavery controls. Audit requirements were enhanced during the year to include recruitment advertising compliance and stronger protections for children and young workers.

Desktop audits were completed with international recruitment suppliers, including reviews of recruitment fees, migrant worker recruitment routes, legal compliance, worker welfare arrangements and responsible recruitment controls. Where opportunities for improvement were identified, corrective actions and further training were required.

Right to Work Compliance

Following the implementation of RightCheck in 2025, the system is now fully embedded within our recruitment and compliance processes.

During the year, we:

- Used RightCheck for all new starter right to work verification.
- Continued monitoring time-limited work permissions and visa expiry dates.
- Centralised historic employee records within the platform.
- Reviewed forthcoming legislative changes and additional verification requirements relating to digital identity services and right to work compliance.

Labour Provider Audits and Worker Voice

Albert Bartlett continued to conduct audits of labour providers and agency partners operating across our sites.

These audits included confidential discussions with workers to ensure employees had an opportunity to raise concerns directly. Feedback obtained through these audits formed part of our continuous improvement programme and helped identify issues requiring management attention.

Human Rights Due Diligence

Our procurement, HR and sustainability teams continued to develop and maintain ethical supply chain mapping and human rights due diligence processes.

Responsible sourcing data and supply chain risk information continued to be monitored through dedicated ethical dashboards and supply chain mapping tools, enabling ongoing review of supplier risk and compliance performance.



Slavery and Human Trafficking Company Statement

SMETA Audits and Ethical Trading

During 2026, Albert Bartlett continued to undertake and prepare for SMETA audits across multiple sites as part of its commitment to ethical trading and compliance with the responsible sourcing and human rights expectations of major retail customers.

Activity included:

- Completion and follow-up of SMETA audits at Boston, Jersey and Cornwall.
- Preparation for an Airdrie SMETA 7.0 audit.
- Development and implementation of corrective action plans.
- Monitoring and closure of previous non-conformances.
- Publication and management of audit findings through the SEDEX platform.

Where audit findings identified opportunities for improvement, the business developed corrective action plans and worked collaboratively with customers, suppliers and audit bodies to implement appropriate solutions. This included reviewing recruitment-related costs and strengthening recruitment due diligence processes.

We also continued to monitor supplier audit results through SEDEX and incorporated findings into our broader human rights due diligence programme.

Ethics Focus Group

Albert Bartlett's cross-functional Ethics Focus Group continued to meet bi-annually throughout the year.

The Group brings together representatives from multiple sites and functions to review:

- SMETA audit findings
- Responsible recruitment
- Right to work compliance
- EcoVadis performance
- Ethical supply chain mapping
- Employee training
- Supplier engagement
- Modern slavery and labour exploitation risks

The Group provides oversight of ethical performance across the business and supports the development of continuous improvement initiatives.

Training and Awareness

We continue to believe that education and awareness are critical to preventing modern slavery.

During 2026:

- Members of the HR and management teams completed Stronger Together training programmes.
- Additional colleagues completed Advanced Tackling Modern Slavery in UK Businesses workshops.
- Responsible Recruitment training was completed by relevant personnel.
- Recruitment suppliers were required to undertake training where identified through audit activity.

Modern slavery awareness continues to be included within employee inductions and labour provider onboarding processes.



Slavery and Human Trafficking Company Statement

Engagement and Collaboration

Albert Bartlett remains an active participant in external initiatives designed to tackle modern slavery.

During the year we continued our engagement with Scotland Against Modern Slavery (SAMS) and participated in sector discussions involving employers, law enforcement and anti-slavery organisations. These activities support the sharing of knowledge, emerging risks and good practice across industry.

Sustainability and EcoVadis

The business retained its EcoVadis Committed Badge during 2026 and continued implementing ethics and human rights improvements identified through the EcoVadis assessment process.

Work continued throughout the year to strengthen reporting, evidence gathering and performance monitoring across ethics, labour and human rights topics.

Effectiveness

We measure the effectiveness of our modern slavery activities through:

- SMETA audit outcomes and closure of corrective actions.
- Labour provider audit completion.
- Supplier due diligence and SEDEX engagement.
- Stronger Together training completion.
- Worker interviews and worker voice mechanisms.
- Ethics Focus Group reviews.
- RightCheck compliance monitoring.
- EcoVadis performance and delivery of improvement opportunities.

Priorities for the Next 12 Months

During the next reporting period, Albert Bartlett will:

- Continue to strengthen responsible recruitment controls and due diligence processes.
- Expand modern slavery and responsible recruitment training across management teams.
- Further develop our human rights due diligence and ethical sourcing programme.
- Continue participation in SMETA and EcoVadis assessments.
- Enhance worker voice arrangements through worker interviews and employee forums.
- Review recruitment-related costs and reimbursement arrangements to ensure continued alignment with ethical recruitment expectations.
- Maintain and develop our partnership working with organisations such as Stronger Together and Scotland Against Modern Slavery.
- Continue to embed modern slavery awareness across the business through training, communications and Anti-Slavery Week activities.



Slavery and Human Trafficking Company Statement

Approval

This statement has been approved by the Board of Directors of Albert Bartlett and will be reviewed annually.

Signed,

Colin Campbell
Chief Operations Officer
Albert Bartlett