



Modern Slavery Statement 2025/26

Introduction

At COOK, our purpose is to nourish people and planet. Home cooking is about more than feeding the body—it's about nourishment, and COOK is a business built on strong, caring and nourishing relationships between all people. Since certifying as B Corp in 2013, we have reinforced our commitment to being a business that creates positive impacts for people and the planet, ensuring we make profits we can be proud of. Caring for people is deeply embedded in our DNA, and this includes a firm commitment to reducing the risk of Modern Slavery within our business.

As a food business sourcing ingredients globally, we acknowledge the risk of exploitation within supply chains. With the number of potential modern slavery victims identified in the UK continuing to rise, we recognise the importance of remaining vigilant and proactive in identifying and mitigating risks.

This statement outlines the steps we have taken during the 2025/26 financial year to prevent Modern Slavery and Human Trafficking across all areas of our business.

Our Structure and Supply Chain

COOK makes and sells hand-prepared frozen food. Our operations include over 100 shops across the UK, about a quarter of which are franchises, as well as freezers in over 1,200 like-minded retail partners, a warehouse, a home delivery hub, three large Kitchens, and a dedicated Puddings Kitchen. As a vertically integrated, family-owned business with over 1,900 employees, we've stayed true to our founding statement from 1997: 'To cook using the same ingredients and techniques you would use at home, so everything looks and tastes homemade.' This remains our guiding principle today.

We collaborate with around 300 suppliers and service providers, building strong relationships founded on trust and transparency. We believe that meaningful progress in eradicating Modern Slavery is only possible through close collaboration with our supplier partners.

Responsibility for our approach to tackling Modern Slavery lies with our Technical and Sustainability Director, a member of our senior leadership team. They coordinate our strategy and ensure its effective implementation across the business.

Our Policies

One of our core values is Be Part of the Family, which reflects our commitment to looking out for and supporting one another. We have several policies that outline our approach to treating people fairly and responsibly, all of which are published in the COOK Handbook—our central resource for internal policies and rules, provided to every employee upon joining.

The Handbook includes our Code of Conduct, Disciplinary and Grievance Policies, Equal Opportunities Policy, and Whistleblowing Policy. Together, these ensure our people understand what constitutes appropriate behaviour and how to report grievances. Our Whistleblowing Policy provides a confidential phoneline for employees to raise concerns, such as harassment or exploitation, including Modern Slavery, without fear of reprisal.

The Handbook also outlines our compliance with UK legislation on the right to work. Our recruitment process is designed to ensure all employees are legally and freely able to work, requiring references and copies of passports or equivalent documents. In addition, all new starters receive a company information pack, which includes a Modern



Slavery Awareness and Guidance document. This document educates staff about what Modern Slavery is, common signs to watch for, and how to report concerns.

While most of our Kitchen staff are COOK employees, we also use employment agencies regularly. We require all agencies to adhere to our Supplier Code of Ethics, aligned with the Ethical Trade Initiative's Base Code. We conduct audits to confirm compliance, verify their Gangmasters and Labour Abuse Authority (GLAA) license, and include them in our Annual Supplier Risk Assessments. This year, our agency suppliers completed an Enhanced Due Diligence Questionnaire based on best practices for service providers, developed in partnership with members of the Food Network for Ethical Trade (FNET). This has given us deeper insight into how our agencies are working to identify, mitigate and prevent risks of modern slavery.

Our Supply Chain

We recognise our responsibility to ensure that everyone working in our supply chain is treated with respect and fairness.

Our Supplier Code of Ethics outlines the human rights standards we expect all suppliers- whether providing ingredients, products, or services- to meet as a condition of doing business with COOK. Suppliers must re-sign the Code every three years to confirm ongoing compliance, and we also expect their upstream supply chains to align with these principles. Based on the Ethical Trading Initiative's Base Code, our Supplier Code of Ethics addresses critical areas such as labour rights, working conditions, and child labour. It explicitly states that:

- "All work shall be voluntary, and workers must be free to leave work or terminate their employment after reasonable notice."
- "Employees must be provided with wages and benefits that, at a minimum, comply with all national legal requirements."
- "Steps shall be taken to guard against modern slavery in all its forms."

We have a policy in place for sourcing ingredients from high-risk countries of origin, defined as those with an elevated risk of human rights abuses due to governance, socio-economic, and industry-specific factors. This policy ensures heightened vigilance and additional due diligence is carried out to better protect human rights in these regions. In the coming year, we are seeking to enhance transparency in countries with high human rights risks by working to ensure all suppliers operating in these geographies undergo third-party social audits, if they have not already. Whilst we acknowledge that audits are not perfect, we do see them as a useful stepping stone for better identifying where action or support is required.

This year saw the formation of monthly meetings between members of our Impact and Procurement teams. These meetings aim to strengthen collaboration and further embed our human rights strategy into the way we work with suppliers. As part of this, team members have started attending FNET's Responsible Procurement Working Group, and as a result, are in the process of completing a Responsible Purchasing Practices in Food Gap Analysis (based on the ETI's Common Framework for Responsible Purchasing Practices) to identify potential impacts of current purchasing behaviours and to take steps towards mitigating and improving these.

COOK is an active member of the Food Network for Ethical Trade (FNET), a membership organisation which brings together UK retailers and suppliers to work pre-competitively, with the aim of better impacting human rights as an industry. Our Head of Sustainable Food is a co-lead of FNET's Raw Materials and Services working group and, in September 2025, was appointed to FNET's Board as a Retail Director.

This year, we paid particular focus on improving due diligence with our logistics partners. COOK took part in a pilot trial of FNET's Haulage Provider Checklist, a specialist tool designed by FNET members to help businesses ask tailored



human rights questions within a part of the supply chain that is often underexplored. Our haulage partner feedback was used to revise the tool, and the checklist has since been officially launched to all members.

Due Diligence & Risk Assessment

Our Supplier Risk Assessment includes a comprehensive review of each supplier's social performance. We share the risk assessment scores with suppliers, providing opportunities for open discussion and collaboration to drive improvements. For suppliers identified as high risk, we actively address areas of concern until sufficient progress is made. If progress remains inadequate, we initiate the process to terminate the relationship.

The risk assessment directly informs our Supplier Action Schedule, which determines the frequency of supplier site visits. These visits include specific modern slavery parameters in line with Stronger Together's criteria, ensuring a hands-on approach to identifying risks during audits.

As members of Sedex (Supplier Ethical Data Exchange), we leverage their platform to evaluate the due diligence of current and potential suppliers across labour rights, health and safety, environmental performance, and business ethics. We monitor and act on any non-conformances identified, especially markers of forced labour. Suppliers' Sedex performance is reviewed at each Quarterly Supplier Meeting. Where non-conformances are identified, our approach is to work collaboratively with suppliers to agree corrective actions and provide support to achieve sustained compliance, rather than disengaging without addressing underlying risks. We also use the Sedex RADAR tool to identify salient human rights risks in our supply chains.

In September this year we launched our Supplier Partnership programme, which is focused on better monitoring and enhancing the social and environmental performance of our Priority Ingredient suppliers; those with the largest spends or the greatest potential impacts. Through open dialogue and improved data collection, we have seen many Priority Ingredient suppliers proactively exceed legal requirements in their human rights due diligence. Most of our Priority Ingredient suppliers are Sedex members, further increasing transparency in our most important supply chains.

Training

Relevant team leaders from our Kitchen production sites, logistics sites and key office teams (Human Resources, Technical, Impact and Procurement) have received dedicated modern slavery training. The training was delivered by Stronger Together and aimed to deepen knowledge of modern slavery in a manufacturing setting, specifically how to spot, prevent and report it.

As a responsible business, we believe business can be a powerful force for positive change. Reducing the risk of modern slavery across our operations and supply chains remains a core priority, and we are committed to taking proactive, collaborative action in the year ahead.

This statement has been approved by the COOK Board and covers the period of April 2025 to March 2026.

Edward Perry
Founder & Co-CEO

Rosie Brown
Co-CEO