



Group Modern Slavery Statement

Background

Section 54(1) of the Modern Slavery Act 2015 formalises the duty of businesses with an annual turnover exceeding £36m per annum to tackle modern slavery and human trafficking. These are abhorrent practices that should not be accepted by businesses of any size. We believe all staff have a responsibility to report any concerns and all management are expected to act on them.

Company structure

Zetar Limited is the holding company for “Zertus UK & Ireland” (comprising Humdinger Limited, Kinnerton (Confectionery) Co. Limited and Lir Chocolates Limited in Ireland (the Group)). Our ultimate parent company, Zertus GmbH, dates back to 1826 and is one of the oldest family owned companies in Germany. The conglomerate, headquartered in Hamburg, operates internationally with eight independent subsidiaries that produce and sell high-quality foods.

Zertus UK&I

Kinnerton Confectionery is the fourth largest chocolate producer in the UK with a turnover of c£88m. Kinnerton Confectionery has its headquarters in Norfolk and was founded more than 30 years ago and employs approximately 600 people. Every year the company produces more than 10 million advent calendars in top quality and more than 20 million Easter eggs and, thanks to its broad range, is one of Britain’s most important producers of seasonal goods.

Humdinger is an ambient food packing and distribution business with manufacturing sites in Heckington, Sherburn and Bromborough and an office based in Hull. It is focussed predominantly on dried fruit, nuts, seeds, pulses and beans. The Company turnover exceeds c£150m and sales cover all of the UK major grocery multiple retailers and a number of independent wholesalers. Approximately 95% of the business is conducted within the UK with the remaining share within the EU.

Our Irish chocolate company Lir Chocolates is the specialist for premium chocolates, filled chocolate and creative forms of chocolate with a turnover of c€40m. Its successful and award-winning cooperation with brands such as Baileys, Guinness and Marks & Spencer make Lir the experts in premium chocolates.

The Group’s aims and responsibilities

- Group board level responsibility for ensuring suitable policies are in place to identify and prevent slavery and human trafficking.
- Building social responsibility into the way we do business.
- Applying ETI base codes in our own business as well as in our supply chains.
- To ensure good labour practice, encourage continuous improvement and protect possible victims throughout the supply chain.
- Continue to work with our suppliers to address risks.
- Cease our relationship with the suppliers where we have identified weaknesses and they are unwilling to improve.
- Commitment to acting ethically and with integrity in all of our business relationships and to implementing effective systems and controls.

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Zertus UK&I also demonstrates its commitments through its Human Rights and Ethical Trading and Social Compliance Policies.

Supply chains

The Group is made up of broad based commodity businesses, sourcing raw materials from all five continents. Significant progress continues to be made within our global supply chain in communicating and applying our own Ethical Sourcing Frameworks, Anti-Slavery Policies and Corporate Social Responsibility Policies. We continue to use SEDEX as our benchmark and will proactively investigate any suppliers or contractors who are identified as possessing possible indicators of forced labour. We will cease relationships where suppliers are unwilling to comply or are unable to improve. Controls are implemented to prevent slavery and human trafficking.

Due diligence processes

As part of our initiatives to ensure the Group is not connected to or supporting these practices, we promote the following:

- Where possible, the Group pack their own products in factories that it controls on a day to day basis and distributes from a warehouse network that it manages.
- The Group strongly adheres to and supports the Ethical Trading Initiative Base Code
- The Group has conducted risk assessments of its total business and has identified the key areas for management focus.
- Regular newsletters are circulated to all employees with reports and updates on modern day slavery, human trafficking, employment law (including benefits/ pay/ conditions), SMETA audit results and worker survey responses
- Worker representative committees and meetings are supported by senior management
- All suppliers must sign up to SEDEX or another sustainability platform
- All supplier audits include ethical alongside food safety and environmental matters
- We work closely with suppliers of the chocolate we buy to ensure that all the cocoa comes from sustainable sources, a key goal of which is to enhance the safety and wellbeing of children and families in cocoa farming areas
- We wholly recognise our responsibility to ensure the sustainability and traceability of sourced items through all stages of production, processing and distribution. This is why we favour suppliers who consider the economic, social and environmental impact of their business along the entire supply chain
- Commitment to ensure that all appropriate managers and supervisors receive training

Policies on Modern Slavery

We maintain policies that reflect our commitment to ethical operations these include:

- Human Rights Policy
- Ethical Trade Policy
- Responsible Sourcing Policy
- Remediation Policy
- Whistleblowing Policy
- Recruitment Policy (including right to work)

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These policies outline our expectations for employees and suppliers and provide mechanisms for reporting concerns confidentially.

Whistleblowing

Employees are empowered to bring information about any wrongdoing to our attention, as documented within the relevant policy/handbook and via retailer whistleblowing hotlines documented and displayed at each site. No employee will face adverse treatment or reprisal through the act of whistleblowing. Our whistleblowing policy and channels are shared with our first-tier suppliers.

Measuring Effectiveness

We monitor our progress using the following indicators:

- Number of high-risk suppliers with ethical audits
- Number of supplier critical non conformances
- Number of employees trained in modern slavery
- Number of reported concerns and outcomes
- Improvements identified during SMETA audits
- Temporary worker interviews and labour provider audits
- Feedback provided via worker voice platforms such as employee forums and worker surveys

Actions Taken this Year

During this financial year, we have:

- Reviewed and updated our Human Rights Policy
- Reviewed and updated our Responsible Sourcing Policy
- Conducted risk assessment across the supply chain incorporating human rights risks
- Delivered training to procurement and HR teams
- Completed awareness briefings to employees in Ireland regarding modern slavery
- Conducted human rights celebrations raising awareness across the business via the UN Human Rights Day
- Published our statement on the Modern Slavery Statement Registry as encouraged by the Home Office

Future Commitments

We are committed to preventing modern slavery and human trafficking in the workplace and will continue to monitor our actions and make progress to maintain and meet them. In the next financial year, we plan to:

- Work towards conducting a site-specific risk assessment for modern slavery
- Develop an action plan based on the site-specific risk assessment outputs
- Include modern slavery awareness within hiring manager training to increase knowledge of how to spot signs during the recruitment processes
- Increase the number of employees trained in modern slavery

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- Implement actions from human rights supplier assurance risk assessments
- Roll out the Responsible Sourcing Policy increasing our minimum requirements to suppliers
- Continue with educational awareness days
- Promote the Good Work App

I, the undersigned, confirm that this statement has been approved by the Board of Directors and accurately reflects the actions of Humdinger Ltd, Kinnerton (Confectionery) Co. Ltd and Lir Chocolates Ltd for the financial year stated below.

Jane Berry
CEO UKI
26/05/2026

Reporting Period 01/01/2025 – 31/12/2025

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