

## **Definition**

Modern Slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We operate a zero-tolerance approach to modern slavery and human trafficking, in line with the UK Modern Slavery Act 2015. This standard applies across our business and extends to our suppliers, producers, trading partners, and any associated persons.

We are committed to acting ethically and with integrity in all our business dealings and relationships and implementing effective systems and controls to prevent modern slavery from occurring within our operations and supply chains.

## **Colleague Training and Responsibilities**

Our policy is available for all colleagues and is expected to be read, understood and complied with. We recognise that higher risk areas include, line management roles, recruitment activities, including the use of agencies, supply chain management and contractor oversight.

In line with our zero-tolerance approach to modern slavery; the prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all colleagues and associated persons.

Any individual who suspects or has concerns, that a conflict with this policy has, or may occur, must and are encouraged to make a confidential disclosure, following the process set out in the Whistleblowing Policy, or should notify a member of the Board or Executive Committee as soon as possible.

Key stakeholders receive training on modern slavery risks and statutory requirements on induction, annually thereafter, and at any other time considered necessary. This training is delivered in conjunction with our online learning partner to ensure consistent awareness and understanding.

## **Consequences of Non-Compliance**

Any colleague found to be in breach of our policy in relation to Modern Slavery may be subject to disciplinary action. We will seek to terminate our relationship with individuals or organisations working for, or on our behalf, where noncompliance with our policies and procedures is identified.

We are confident that our internal systems, controls, and policies are sufficient to ensure that we are compliant with the Modern Slavery Act 2015. We are committed to acting promptly to identify, assess and address any concerns or suspicions of slavery or human trafficking.

## **Supplier Contracts**

We are committed to working with suppliers that meet our high standards. Our supplier contracts require the other party to confirm that slavery or human trafficking are not taking place within their business or supply chains.

We also confirm that our exacting standards are met when working with suppliers using our Technical Supplier Approval Questionnaire which is mandatory and supports our approach to ethical trading. Supplier questionnaires are completed as standard by Booths Brand suppliers prior to the first supply of goods and every 3 years thereafter.

The Technical Supplier Approval Questionnaire and audit processes include ethical clauses, requesting that suppliers must adhere to local and national legislation with respect to terms and conditions of employment.

Where noncompliance to the supplier questionnaire is identified, we adopt a risk-based approach and complete on-site visits to understand the reason for noncompliance and satisfy ourselves of their suitability. Our risk rating system covers all aspects of food safety, quality, and ethical trading.

We maintain an ongoing programme of contact with our suppliers, producers and trading partners, and as part of that programme we check, as far as reasonably possible, that they are similarly committed to good practices throughout their workforce and contractor arrangements.

All Booths brand suppliers, producers and trading partners are subject to this due diligence and audit process.

### **Future Plans**

We will continue to take appropriate steps to ensure that periodic training is provided to colleagues in roles identified as presenting a higher risk of exposure to modern slavery and human trafficking. This will include a combination of induction-based training and regular refresher training to ensure ongoing awareness and understanding.

We will regularly review and update our ethical policies and training programmes, including those relating to modern slavery, to ensure they remain effective and reflect our commitment to maintaining high standards of conduct. These measures are designed to support compliance with the UK Modern Slavery Act 2015 and to reinforce our zero-tolerance approach to this subject.

In line with our due diligence obligations, we will implement a new framework to assess risks within our supply chains, including the sourcing of raw materials used in Booths brand products. This assessment will consider the geographical origin of materials and the level of modern slavery and human trafficking risk associated with relevant countries and regions. These requirements will be incorporated into our trading terms and conditions, and suppliers are expected to demonstrate appropriate and proportionate due diligence to ensure compliance with our ethical standards.

In addition, we are updating our trading terms and conditions to incorporate more rigid ethical clauses including modern slavery and human trafficking. This will then trigger an update to previously held supplier contracts.