

## Modern Slavery Statement

### For the Financial Year Ending March 2026

#### Introduction

Bennett Opie Ltd is a food manufacturer and importer that has been trading for over 145 years. We are extremely proud to have remained an independent 5<sup>th</sup> generation family business that clearly recognises the value of ethical and fair trading. Our Board of Directors are fully supported in the aims of the Modern Slavery Act 2015, and in line with our internal Ethical Trading and Ethical Policy (POL38), we are committed to combatting the risk of human trafficking and slavery within our business and in any association to our organisation.

Here at Bennett Opie, we have a zero-tolerance approach to modern slavery, and we recognise that this may be demonstrated in multiple ways, for example; slavery, worker exploitation, human trafficking and financial exploitation in both adults and children, and we believe in the freedom of choice without any form of exploitation.

This statement outlines the steps we have taken during the 2025/2026 financial year to prevent Modern Slavery and Human Trafficking across our business and supply chain.

#### **1. Our Structure and Supply Chain**

##### Our Business

Bennett Opie is a long-established food manufacturer, based in Sittingbourne, Kent. We are proud to produce a wide range of food and drink products for retail and foodservice customers in the UK and internationally. We employ over 130 colleagues across three sites: our manufacturing facility, main office and distribution centre. The business operates primarily within the United Kingdom and supplies products to customers across the UK and international markets. Bennett Opie operates through a central organisational structure, with functions including procurement, manufacturing, quality, sales, warehousing and distribution working collaboratively to support business operations.

Bennett Opie's supply chain operates on a global scale. Raw materials, ingredients and packaging are sourced from suppliers located within the UK and internationally. Where possible, we aim to procure from UK-based companies; however, due to the nature of some ingredients and products, sourcing from overseas suppliers is necessary.

##### Risk Assessment

For all core raw materials, ingredients and packaging used in the production of our products within our Sittingbourne manufacturing facility, suppliers are approved through our supplier

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approval process. This includes either registration with SEDEX or completion of an ethical questionnaire, incorporating the Ethical Trading Initiative (ETI) Base Code.

The Global Slavery Index 2025 identifies several of our key sourcing countries as presenting a medium risk of modern slavery. India and Vietnam remain the principal sourcing locations within our supply chain that hold the highest risk level. The report identifies agriculture within these countries as particularly vulnerable due to its intensive labour requirements and the challenges associated with monitoring and regulation. As a result, we continue to focus our due diligence and resources on these higher-risk areas.

In addition to raw materials and packaging, we procure a range of services from UK suppliers including, but not limited to, laundry, machinery, maintenance, cleaning contracts, freight, couriers, telecommunications, Personal Protective Equipment (PPE). Whilst some suppliers publish their own Modern Slavery statements and ethical policies, transparency varies across sectors and suppliers. However, these organisations are subject to UK employment and labour legislation. This may indicate a lower level of risk, although this does not eliminate the possibility of non-compliance.

To further strengthen our understanding of supply chain risk and improve transparency, we aim to complete a comprehensive supply chain risk assessment covering all suppliers within the next two years.

## **Supply Chain Understanding**

At present, Bennett Opie has mapped its supply chain to Tier 1 suppliers and, where possible, some Tier 2 suppliers. We recognise the importance of understanding the wider supply chain and improving visibility beyond direct suppliers to identify and address potential risks.

Our aim is to achieve full visibility of all Tier 1 and Tier 2 suppliers within the next two years. This will enable us to better understand the origin of our goods and services, strengthen supply chain transparency and identify areas where there may be an increased risk of modern slavery or unethical labour practices.

## **2. Policies in relation to slavery and human trafficking**

Bennett Opie has several policies which support our commitment to treating people fairly and minimising the risk of modern slavery within our organisation and throughout our supply chain. These policies establish the standards and expectations that guide our approach to ethical business practices and responsible sourcing.

Internal policies relevant to modern slavery include our Ethical Trading and Ethical Policy and Human Rights Policy. These policies form part of our wider commitment to ethical conduct and protecting the rights of workers both within our organisation and across our supply chain.

The Ethical Trading and Ethical Policy is designed to provide guidance and reinforce the company's commitment to responsible and ethical business behaviour. It sets out our

commitment to protecting the rights of all individuals whose work contributes to the success of the business, including colleagues, contractors and workers within our supply chain. The policy outlines Bennett Opie's opposition to all forms of slavery and human trafficking and states that employment must be freely chosen. It further establishes expectations around fair treatment, safe and hygienic working conditions, non-discrimination and a workplace free from harassment. These ethical requirements are aligned with the Ethical Trading Initiative (ETI) Base Code principles.

Furthermore, The Human Rights Policy outlines our commitment to complying with all UK and international human rights laws and standards. The policy addresses a range of topics including equality, diversity and inclusion, forced labour and safe working conditions.

Both policies are introduced to new colleagues during their onboarding process and are included in the Colleague Handbook. We also show directly employed colleagues and agency colleagues the Stronger Together introduction to modern slavery awareness videos and having a discussion post viewing. This helps ensure colleagues understand the Company's expectations and commitments relating to ethical conduct, human rights and responsible business practices from the outset of their employment and who to speak to should they have any concerns or are aware of any potential incidents relating to themselves or a colleague. Additionally, this supports awareness for colleagues that can be utilised externally to Bennett Opie Ltd, such as raising awareness to family and friends that may be potential victims of modern slavery.

### **3. Due Diligence Processes**

Bennett Opie is fully committed to ethical working practices and deems any inhumane conditions unacceptable; this includes both within our organisation and through our supply chains. We operate a zero-tolerance approach to modern slavery and seek to address potential risks through a robust due diligence process.

As part of our supplier onboarding process, all new suppliers are required to complete a Supplier Approval Questionnaire, Primary Supplier Approval Questionnaire and Supplier Ethical Questionnaire. This process helps ensure suppliers align with our values and expectations and allows us to identify and assess any potential risks relating to modern slavery at an early stage.

Additionally, in relation to new colleagues directly employed due diligence is maintained by checking documentation including Right to Work in the UK (original documentation), contact details and bank details. Whilst these due diligence checks also apply to our agency colleagues; the Company also undertakes on-site in-person audits at the premise of our temporary labour partner twice a year. Furthermore, interviews are conducted once colleagues have joined the business to ask any questions. This helps ensure that colleagues are receiving all monies owed directly to them and that they have freely chosen to work for our company without coercion or undue influence.

## 4. Risk Assessment and Management

Our procurement team plays a key role in promoting ethical practices throughout our supply chain. Fair and responsible trading has always been, and continues to be, central to our business and values. Many of our existing procedures, standards and ways of working already help to mitigate the risk of modern slavery within our supply chains.

As part of Bennett Opie's commitment to helping increase awareness of the issues directly and indirectly associated with Modern Slavery, we are a member of SEDEX (not for profit organisation). SEDEX is dedicated to improving ethical business practices throughout organisations and their supply chains. We encourage our suppliers to become members of SEDEX. However, where this is not the case, we seek confirmation of their commitment to the Modern Slavery Act 2015 by means of their own Modern Slavery Statement.

We have previously been awarded the Business Partner Status in partnership with the Stronger Together organisation, underlining the businesses commitment to reducing the risk of modern slavery, giving key staff and personnel access to a wide range of training and literature to help understand and identify key risks within our business and supply chain, enabling support and awareness to be cascaded throughout our organisation and beyond. This partnership programme includes a monitoring system that will measure the effectiveness of our actions and progress over time of key goals and KPI's.

We continue to arrange to visit our suppliers that are based in medium-to-high-risk parts of the world, according to the Global Slavery Index, on a minimum of three times a year. These visits are crucial to see first-hand how their business works and to discuss in person issues arising from the possibility of modern slavery. This helps to promote an open and ethical trading relationship. In 2025, site visits were conducted in countries identified as medium risk, including China, Vietnam and India, providing an opportunity to assess working practices first-hand and engage directly with suppliers on ethical standards and modern slavery risks.

If we find incidences of slavery in our supply chains, our priority remains to cause no further harm to the victim(s). We would ideally want to help resolve the underlying causes of the problem by liaising closely with the supplier, though if no solution was possible, we would cease our trading relationship with the supplier over an agreed timescale.

## 5. Key Performance Indicators to Measure Effectiveness of Steps Being Taken

To assess the effectiveness of the steps being taken to minimise the risk of modern slavery within our organisation and supply chain, Bennett Opie monitors several key performance indicators (KPIs). These measures support ongoing review and help identify opportunities for improvement in our approach to identifying and mitigating modern slavery risks. Current indicators include:

- Completion and review of supplier ethical assessments and approval documentation.

- Percentage of suppliers assessed through SEDEX registration or completion of an ethical questionnaire.
- Completion of labour provider and agency audits to assess compliance with ethical and employment standards and legislation.
- Number of supplier visits completed, where appropriate, to strengthen understanding of supplier operations and working practices.

## 6. Training on modern slavery and trafficking.

Bennett Opie recognises the importance of raising awareness of modern slavery and human trafficking to ensure colleagues can identify, understand and report potential concerns. Relevant leads and champions across departments, including Procurement and Technical, have received targeted training relating to Modern Slavery to support their understanding of associated risks and responsibilities, and how to identify potential signs of modern slavery / trafficking.

Modern Slavery awareness is also incorporated into colleague inductions and team meetings to ensure new and existing colleagues understand the organisation's expectations, recognise potential indicators of modern slavery and are aware of how concerns can be raised and reported.

In addition, staff notice boards are displayed across all sites to raise awareness among colleagues and highlight the signs of modern slavery. These communications utilise awareness materials and guidance published by the UK Government to help ensure colleagues are informed and able to recognise potential indicators of exploitation.

Overall, Bennett Opie Ltd and its Directors are committed to continually promoting awareness of modern slavery and human trafficking, both internally across the business and externally throughout our wider network and supply chain.

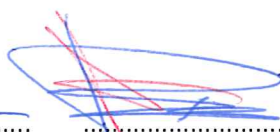
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