



McCain Foods (GB) Ltd.

Modern Slavery Statement **FY25.**

Sustainability, human rights, and dignity in our supply chain.



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Foreword.

As a leading producer of prepared potato and appetiser products, and a family-owned company, McCain holds its commitment to respecting human rights in conducting its global business. Addressing modern slavery and the exploitation of human rights across the global supply chain is an important priority, particularly because the bulk of ingredients come from farmers and suppliers of agricultural products.

McCain Foods Limited ("**McCain**", "**it**" or "**its**") is proud to be a family-owned and values-driven company. McCain's shared values - Family, Authentic, Quality and Trusted - are important to the direction of decisions made regarding supply chain and procurement around the world.

A number of appropriate company policies and processes, including the **McCain Global Code of Conduct** and **Supplier Code of Conduct** have been in place for years to identify and manage risks globally.

However, the introduction of the *Modern Slavery Act 2015* and similar legislation elsewhere sharpened McCain's focus to respect the human rights of workers and the integrity of its supply chain. McCain sees this as an opportunity to continue to develop its framework of guiding principles to ensure that its business practices help to address the risk of modern slavery within McCain's own operations and supply chain..

In addition to looking at the policies and programs currently in place at McCain, this report outlines initiatives in development to support McCain Foods (GB) Ltd's ("**McCain Foods GB**", "**us**", "**we**" or "**our**") to address the risks of modern slavery within our own operations and supply chain.



McCain Foods (GB) Ltd - Modern Slavery Statement

This statement is made under the Modern Slavery Act 2015. It sets out the actions taken by McCain and McCain Foods (GB) Ltd, an entity registered in England, to address modern slavery risks in our own operations and supply chain over the financial year ending 30 June 2025 ("FY25").

Structure, operations, and supply chain.

McCain operates a global business. The head office of McCain, the Canadian parent company of McCain Foods GB, is located in Toronto, Canada.

McCain is a privately owned, multi-national leader in the frozen food industry, manufacturing quality products, including French fries, appetisers, pizzas, vegetables, desserts, and prepared meals. McCain also owns companies in complementary industries, such as agriculture and transportation.

In Great Britain and Ireland, McCain Foods GB is the largest branded manufacturer of frozen potato products and a trusted supplier to quick service restaurants, food service businesses, and retail (supermarkets). We also manufacture and sell a range of appetiser products.

We directly employ over 1,300 people and thousands more indirectly through our logistics and supply chain.

We are proud of our place in the British and Irish markets, and particularly of the relationships we have cultivated with local farmers. McCain Foods GB sources the overwhelming majority of our produce locally and we are committed to working with our farmers to support their day-to-day practices, as well as investigating ways to support new and innovative farming methods.

The supply chain of products and services that contribute to our operations includes raw agricultural materials - the top categories being potato and other commodities, including frying oils and dairy. McCain Foods GB is the largest purchaser of British potatoes and, in FY25, our largest category of spend was on agricultural products and specifically potatoes - procured from 270 contracted suppliers, while other ingredients and raw materials were sourced from 29 suppliers in 12 countries.



Diagram 2 – McCain Foods GB supply chain

¹ McCain differentiates procurement based on direct and indirect goods. Direct procurement involves the purchasing of goods, materials, and services directly associated with the production of products (e.g. raw potatoes, ingredients, spices, and packaging), whereas indirect procurement refers to expenses incurred for materials, services, and maintenance required to operate the business (e.g. manufacturing equipment, maintenance costs, and consultancy costs).

Key areas of focus FY25.

Over the past decades, McCain has implemented global policies and processes reflecting its corporate values, including respecting human rights and reducing the risk of modern slavery in its operations and supply chain. Furthermore, McCain Foods GB has placed additional targeted emphasis on this critical area of corporate responsibility since the introduction of the *Modern Slavery Act 2015*.

Risks of modern slavery practices in our operations and supply chain.

As a family-owned business, McCain has always operated according to its core values. McCain has long understood that there is an inherent risk of exposure to the threat of modern slavery and labour exploitation in food and agricultural operations and supply chains, from production and processing to packaging and transportation. The diversity and scale of McCain's supply network means that these threats are relevant to McCain companies around the world, and McCain understands that it has an important responsibility to be focused on respecting human rights and addressing risks of modern slavery in the industry.

That is why McCain has invested significant resources into developing a robust global **Code of Conduct**, **Supplier Code of Conduct**, and global **Human Rights Policy** to govern its own actions and those of its collaborators and suppliers, drawing upon international standards and best practices in human rights and sustainability.

The **Supplier Code of Conduct**, which sets stringent standards of ethical conduct for McCain's suppliers, is founded upon McCain's values, as well as applicable laws around the world.

McCain Foods GB works hard to source products and ingredients locally, working predominantly with suppliers based in Great Britain and Ireland. The following table outlines all countries (based on spend) from which McCain Foods GB sources products (excluding potatoes) and the risks identified with sourcing products from each of those countries based on the Global Modern Slavery Index.² While the Global Modern Slavery Index indicates a low overall risk for the UK, we acknowledge that the agriculture sector continues to face significant challenges regarding labour rights, as reflected in sector-specific risk scores. We remain dedicated to addressing these concerns proactively, including by introducing a Grower Charter.

Country of manufacture	% of spend	Estimated number of people in modern slavery	Estimated prevalence of modern slavery per 1,000 population	Government response rating	Overall weighted average	Risk score
United Kingdom	79.50%	122,000	1.8 / 1000	BBB	11.1	1
Spain	12.27%	108,000	2.3 / 1000	BBB	12.8	1
Cyprus	3.12%	10,000	8.0 / 1000	BBB	19.1	1
Netherlands	1.99%	10,000	0.5 / 1000	A	6.1	1
Czech Republic	1.18%	45,000	4.2 / 1000	BB	19.11	1
Belgium	1.12%	11,000	0.9 / 1000	BBB	13.1	1
Turkey	0.45%	1,320,000	15.6 / 1000	B	51.6	3
USA	0.14%	1,091,000	3.2 / 1000	A	15.9	1
Mexico	0.12%	850,000	6.5 / 1000	BB	57.3	3
Portugal	0.07%	26,000	2.5 / 1000	BBB	8.5	1
Hungary	0.03%	36,000	3.7 / 1000	BB	23.6	1

Risk Legend		
1	0-20	Very Low Risk
2	21-40	Low Risk
3	41-60	Medium Risk
4	61-80	High Risk
5	81-100	Very High Risk

² <https://www.globalslaveryindex.org>

Actions we take to assess and address risks.

1. McCain policies.

McCain believes that strong internal policies and systems are a key aspect of managing and mitigating the risk of modern slavery in its operations and supply chain. McCain expects the same level of diligence in regard to respect for human rights from its suppliers as from its employees.. McCain is committed to respecting human rights in its business and supply chains and has zero tolerance for human rights abuses.

Prior to the enactment of the *Modern Slavery Act 2015*, McCain has had a long-standing set of policies in place that are regularly reviewed to assess and address applicable risks.

These include **McCain's Code of Conduct** [BM1.1], **Anti-Corruption Policy**, and **Supplier Code of Conduct** [BM2.1]. In FY25, McCain also adopted a Human Rights Policy (together with the aforementioned policies, the "Policies") which contains details of McCain's overall global stance on respecting human rights and minimum standards we expect within our own operations and supply chain.

These Policies and other programs - such as McCain's global sustainability strategy - ensure that team members and suppliers are dedicated to managing social, ethical, and environmental issues consistent with McCain's global values.

McCain values learning and transparency. All employees and suppliers are made aware of the expectation that they will familiarise themselves with - and comply with - applicable policies.

2. Modern slavery committee.

McCain Foods GB has established a modern slavery committee comprising senior leaders from departments including legal and compliance, procurement, human resources, food safety and quality, and agriculture ("**Committee**").

The Committee's remit, in addition to the preparation of this modern slavery statement and the ensuing actions, includes:

- Monitoring reporting channels for any incidents of human rights violations and driving action to remediate any incidents if identified; and
- Developing programs, practices, and procedures to enhance our response to modern slavery

The Committee has raised awareness of modern slavery risks - and our response to those risks - through our various divisions, and through an employee training and compliance program, as outlined below.



3. Risk mapping and due diligence.

McCain Foods GB conducts due diligence on all of our suppliers before they are introduced to the supply team. We constantly review the process, looking at ways to enhance it and determine the risk of modern slavery throughout the operations and supply chains of our suppliers.

There are a number of actions we take to assess and address the risks of modern slavery throughout our operations and supply chain.

In FY25, this included (i) enhancing the collection process related to our Supplier Evaluation Survey by having McCain employees complete the survey together with our farmers in person and (ii) actively engaging with our suppliers to encourage them to sign up with Sedex, a third-party risk assessment tool.

This is in addition to the actions implemented in recent years, which include:

- Setting clear supplier expectations including through our **Supplier Code of Conduct**
- Documentation updates to ensure modern slavery risk mitigation components are incorporated, as appropriate, and gaps are addressed; and
- Updated and expanded scoring matrix to best assess the effectiveness of our due diligence

Our future actions continue to focus on:

- the roll out of updated **Supplier Evaluation Survey** across all current and new suppliers; and
- reviewing our direct supply chain and identify any appropriate remediation

In addition to the future actions of McCain Foods GB, to enable McCain to continue to strengthen its human right program, McCain plans to carry out an assessment of potential human rights risks across its own operations and supply chain. This will enable McCain to prioritize key initiatives to manage human rights risks within McCain operations and supply chain. The assessment is planned to be carried out globally.

4. Audits.

McCain periodically monitors compliance with the Policies. Specific auditing of certain relationships, such as with our farmers, became an increasing focus for us. To supply McCain Foods GB, farmers must be Red Tractor compliant - a scheme that includes auditing on modern slavery compliance.

In addition, the contracts for our raw supply have been updated in recent years to ensure they include appropriate contractual commitments with regards to modern slavery. In FY25, we formally audited 60% of our farmer base (by volume).

5. Employee training and compliance.

We continue to increase employee awareness and engagement regarding modern slavery. During FY25, we continued to communicate with staff about modern slavery, and a "Human Rights and Modern Slavery" module was presented by McCain during its FY25 Compliance week.

McCain has continued to incorporate a dialogue about modern slavery into its focus on sustainability actions, including the thriving rural communities in which McCain operates and the long-term, trusted connections to farmers. Additionally, all employees are required to undertake a recertification of the **Code of Conduct** on a regular basis as part of their employment.

McCain engages in best practices in recruiting and hiring to ensure that all employees are appropriately on-boarded and employed in accordance with applicable laws. McCain has continued to consistently take significant actions to ensure the health and safety of employees and applicable third parties.

6. Working with organisations.

McCain has continued a dialogue with a number of our key suppliers and customers regarding the manner in which we can collectively address and reduce the risk of modern slavery.

McCain continues to explore the possibility of working with other organisations / Non-Governmental Organizations to obtain access to authoritative materials and information and guidance on best practices.

7. Managing supplier contracts.

McCain Foods GB maintains standard procurement terms and conditions for transactional matters and negotiated master service agreements for ongoing relationships. Each of these have been updated or will be crafted, as appropriate, to mitigate modern slavery risks.

If a supplier is found to be in breach of the terms stipulated in their contract with us, including those relating to compliance with the **McCain Supplier Code of Conduct**, we are able to take corrective action and suspend or terminate the contract with that supplier.

We take any breach of the **McCain Supplier Code of Conduct** - or any other breach involving a risk to human rights - seriously, addressing it promptly and with the ultimate goal of reducing or removing the risk altogether (for example, potentially removing a supplier from our supply chain).

8. Reporting concerns.

Pursuant to **McCain's Code of Conduct** and **Supplier Code of Conduct**, McCain Foods GB's employees and suppliers have a duty to report any identified or suspected occurrences of modern slavery or human rights violations. Employees may make a report to their manager or local or global Human Resources representative or the Global Legal and Compliance team. For employees or third-party stakeholders who wish to make an anonymous complaint to an external service, McCain retains an independent external service provider which is authorized to receive whistleblowing reports in relation to its global business (contact details are available in the **Code of Conduct** and **Supplier Code of Conduct**). Anonymous complaints can be made through email, online or a third-party call centre and all reports received by the external service provider are reported to McCain's Global Legal & Compliance team, and are investigated as required.

Further actions we will take to assess and address risks.

To strengthen our stance against modern slavery risks in our supply chain, McCain Foods GB has also laid out additional actions it intends to embark upon by the end of FY25:

1. Increasing the assessment of suppliers.

We will continue to further investigate the modern slavery risks in our direct and indirect supply chains and determine appropriate remediation action. This may involve the replacement of high-risk suppliers with suppliers presenting a lower risk of modern slavery in their operations, business, and supply chains.

2. Training.

In addition to our current modern slavery training we continue to consider additional training requirements. Subsequent training may focus on function-specific skills, including how to identify the existence of modern slavery in a supply chain and how to uphold the high standard of requirements that McCain Foods GB has adopted for all our suppliers to help us proactively manage modern slavery risks. Where appropriate and feasible, McCain Foods GB will also offer the training module to suppliers.

3. Audits.

Audit is an ongoing commitment. In addition to auditing the supply contracts of our raw supply with our farmers to ensure the appropriate contractual commitments are incorporated. In FY25 we reached our commitment of auditing 60% of our farmer base. We have made a further commitment to auditing an additional 20% in FY26 and then to continue to randomly audit year-on-year to ensure ongoing adherence to ethical practices.

4. Indirect supply chain assessment.

In FY26, as our response to modern slavery risks continues to develop and matures, the Committee will continue to explore the potential risks within our indirect supply chain and what actions can be taken to address any potential risks as they are identified. We will report progress via this statement, as applicable.

How we assess the effectiveness of actions we take to address modern slavery risks.

McCain's belief that 'good ethics is good businesses' has guided it from farm to fork and is the foundation of its values. On this basis, McCain has built relationships with farmers spanning generations, is recognised for its commitment to sustainability and work in local communities and has been able to successfully implement innovative regional initiatives around the world, including in Great Britain.

It is through these strong relationships and regular contact with farmers that we are able to regularly review our farmer assessment processes – our largest single source of procurement.

McCain's existing Policies are monitored and we may conduct regular audits of the modern slavery programme, both internally as directed by Internal Audit and/or the Committee, and, where appropriate, externally via independent auditing services.

McCain Foods GB will continue to evaluate countries of origin and suppliers and their practices, using and regularly reviewing a scoring matrix to best assess the effectiveness of our due diligence.

The extent of actions taken to address modern slavery risks will be measured by certain quantitative metrics, such as the number of individuals trained, contracts signed with appropriate modern slavery contractual provisions, and the number of audits undertaken.

More importantly, the effectiveness of actions undertaken will be assessed by means of metrics, such as the number of calls to our whistleblower line and investigations launched, if any, and the number of successful audits and resolved non-compliances generated in ethical audits, if any.

This statement was approved by the Board of McCain Foods (GB) Ltd.

Signed,



Jillian Moffatt

Regional President, McCain Foods GB & Ireland and EMENA

Date: