



KELLYDELI COMPANY LIMITED MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

January 2025 – December 2025

1. INTRODUCTION FROM THE CHIEF EXECUTIVE OFFICER

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour, and human trafficking — all of which involve the deprivation of a person's liberty for personal or commercial gain.

Our commitments remain unchanged and unwavering:

To act ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or supply chains.

To ensure transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015.

To expect the same high standards from all contractors, suppliers, and business partners, and to require that they hold their own suppliers to these standards.

To continuously improve our practices to combat modern slavery and human trafficking, going beyond compliance wherever possible. KellyDeli Company Limited, as the holding group of the 'KellyDeli Group', is taking steps to ensure compliance with legislation relating to Anti-Slavery and Human trafficking, as well as doing its utmost to go above and beyond these requirements. KellyDeli has taken these positive actions to combat these unfortunate trends and is committed to continuously improving these processes.

In 2025, we continued to strengthen our due diligence processes, deepen supplier engagement, and reinforce our internal culture of transparency and accountability.

2. OUR STRUCTURE AND SUPPLY CHAINS

KellyDeli is a global food retail and restaurant group operating across Europe, the United Kingdom, and Mexico. We are the parent company of subsidiaries in France, Belgium, Spain, Italy, the United Kingdom, Germany, the Netherlands, Sweden, Finland, Portugal, and Mexico.

As of December 2025, the Group employed approximately 310 employees worldwide.

2.1 Our Business

KellyDeli is an innovative food group committed to bringing the best of Asia to the world through Asian-inspired brands and over 1,000 kiosks. We operate primarily through a franchised model, supporting independent kiosk owners who prepare and sell fresh Asian-inspired food in supermarkets and hypermarkets. We also maintain a franchisor presence in the UAE.

2.2 Our Supply Chains

Our supply chains include **over 65 suppliers** across Europe, ranging from large cross-country suppliers to small local producers. These suppliers provide the ingredients, packaging, and materials used across our kiosk network.

3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Our Modern Slavery Policy, Human Rights Policy, and the modern slavery clause embedded in all supplier contracts reflect our commitment to ethical and responsible business conduct.

Our wider policy framework includes:

- Equality, diversity & inclusion
- Whistleblowing
- Harassment & bullying
- Code of conduct
- Anti-fraud and bribery

In 2025, we continued to reinforce these policies through internal communications, training, and supplier engagement. All supplier contracts remain subject to review to ensure consistent ethical obligations.

4. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We maintain a free and independent whistleblowing line available 24/7 and 365 days a year to all KellyDeli employees. Its purpose is to:

- **Identify** and assess potential risk areas
- **Mitigate** the risk of modern slavery occurring
- **Monitor** potential risk areas
- **Protect** whistleblowers

Where concerns arise at internal, supplier, or partner level, a corrective action plan is required. Failure to address issues adequately may result in contract termination.

Strengthened 2025 Due Diligence

Building on the 2024 external consultancy review, in 2025 we:

- Began implementing supplier-specific improvement plans based on the consultancy's findings
- Expanded our **annual red-flag checks** to include all markets where we operate kiosks.
- Introduced a **partner declaration process**, requiring franchisees to confirm compliance with labour standards and responsible recruitment expectations.
- Enhanced the visibility of the "Message Mike" procedure across all markets, including updated posters and digital reminders.
- We maintain an independent whistleblowing provider, AAB, covered under our Whistleblowing Policy to ensure confidential reporting and employee trust.

5. RISK ASSESSMENT

KellyDeli remains committed to respecting and protecting the human rights of all individuals connected to our operations. Our approach is grounded in transparency, continuous improvement, and collaboration.

Our risk assessment framework includes:

- Country-level risk screening
- Product-level risk assessment
- Supplier-level due diligence
- Internal and partner-level red-flag checks

In 2024, we reassessed our modern slavery risk among 65 suppliers. We instructed an external specialised consultancy firm to conduct due diligence on modern slavery risk and mitigation actions in place among our suppliers. This project allowed us to better understand the risk in our company and plan improvement workstreams.

In 2025, we:

- Updated our risk assessment using the Radar tool and external consultancy insights
- Continued to identify prawn farming/fisheries as a higher-risk category.
- Maintained Mexico and UAE as medium-risk operating regions.

- Prioritised suppliers in these categories for deeper engagement and follow-up actions.
- Created guidance documentation to support partners with recruitment best practices with a focus on checking and storing right to work documents, recruitment best practices, resolution framework.

6. MEASURING EFFECTIVENESS

We measure the effectiveness of our actions through:

- Whistleblowing reports and follow-up
- Supplier audit outcomes
- Training completion rates
- Corrective action plan closure
- Internal and partner red-flag checks

Since 2020, KellyDeli has appointed a General Counsel reporting directly to the CEO and established an Employee Relations Manager role. All key policies — including equality, diversity and inclusion, whistleblowing, harassment & bullying, code of conduct, and Modern Slavery — are reviewed at least annually to ensure continued effectiveness.

KellyDeli has an ethical task force, dedicated to plan, assess, and continuously promote best practices related to human rights, ethics, and equality. The role of the task force is to actively manage any potential risk linked with human rights breaches and to ensure continuous improvement in this arena.

A free and fully independent whistleblowing helpline is available to all employees, with both an online reporting tool (AAB) and toll-free phone numbers listed in our Whistleblowing Policy, ensuring confidential, anonymous reporting 24/7 in all local languages.

Since 2021, KellyDeli joined a global platform allowing to better assess social and environmental risks by countries of operations and industries. The system enabled KellyDeli to access their suppliers social and environmental audits and assess their progress against a set of internationally recognised standards.

In 2024, we reviewed the “Message Mike” procedure and now issue an annual reminder to all partners reinforcing the importance of raising concerns, supported by the Resolution Framework launched in 2025.

In 2025:

- No confirmed cases of modern slavery were identified within our operations or supply chain.
- Red-flag checks were completed across all markets, with follow-up actions implemented where needed.
- Supplier improvement plans were initiated following the 2024 external review.
- The “message Mike” procedure continued to be reinforced, with increased awareness among partners. 7.

TRAINING

In 2021, we moved all employee and partners’ training programs to an online platform. Training for employees includes human rights, responsible recruitment, diversity and inclusion as well as modern slavery. KellyDeli’s values are fully integrated in the policies and partners’ practices through their onboarding programme and online training suite.

In 2023, 80% of all employees completed the anti-modern slavery training, and 81% completed the diversity and inclusion e-learning modules.

In 2024, a tailored modern slavery prevention training was created for partners with a mandatory annual completion. The completion rate for this training was 86%.

In 2025 country specific guidance was created for partners in relation to right to work checking, recruitment best practices and modern slavery resolution framework

Training remains a critical component of our prevention strategy.

- All employees continue to complete mandatory training on human rights, responsible recruitment, diversity & inclusion, and modern slavery.
- In 2025, 96% of employees completed the annual modern slavery refresher training.
- The tailored modern slavery prevention training for partners, introduced in 2024, achieved an 83% completion rate in 2025. And also 97% employees who were issued the training for Diversity and Inclusion completed it.

We are committed to respecting and protecting human rights of all who come into contact with our operations, including employees, partners and supply chain workers. We accept our responsibility to support transparency, to find and resolve problems; to regularly review our business practices; and to collaborate with others to protect the rights of workers, particularly those who are most vulnerable to abuses such as modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes KellyDeli Company Limited's slavery and human trafficking statement for the financial year ending December 2025.

Progress summary

2019: Human rights policy.

2020: General Counsel appointed. New policies introduced.

Introduction of a free confidential helpline

Introduction of internal audits to assess labour standards, business ethics and right to work (UK) **2021:** Human rights policy review and introduction of the nine Ethical Trading Initiative (ETI) base code principle. Formal ethical obligations are included in suppliers' contracts.

Joined a global collaboration platform to improve supply chain transparency.

2022: Supply chain and risk screening using RADAR / UAE & Mexico Medium risk. Prawns' farms most at risk. **2023:** update and communication around our whistle blowing policy and helpline to all our employees. **2024:** Reminder of the "contact Mike" procedure shared with all partners via our internal training platform. Poster displayed in kiosks in the UK and France to further enforce the procedure.

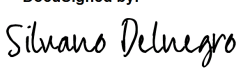
Employee and partner record. Red flag check procedure introduced. Checks performed in France, Belgium, the Netherlands, Germany, the United Kingdom, Spain and Portugal.

Reassessment of our modern slavery risk among 65 suppliers thank to external consultancy.

Tailored Modern Slavery prevention training created for partners (86% completion rate).

2025: KellyDeli strengthened its modern slavery programme by initiating supplier-specific improvement plans following the 2024 external review, expanding red-flag checks to all markets, introducing partner compliance declarations, enhancing employee and partner training modules, and increasing visibility of reporting channels across the network.

Silvano Delnegro

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6/29/2026

**CHIEF EXECUTIVE
OFFICER KellyDeli
Company Limited**