

 caw ingredients	Document Title:	MODERN SLAVERY STATEMENT			Date:	04.05.2026	Version No.	4
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Introduction & Commitment

We fully support and are committed to the objectives of the Modern Slavery Act 2015 ("The Act") in eliminating slavery and human trafficking. In compliance with section 54(1) of The Act, this statement is made for the financial year ending 31st December 2025. Upholding human rights is at the core of our business ethos.

Our Organisation and Supply Chains

Cawingredients Limited is a dynamic and specialised manufacturing company, based in Leeming Bar, North Yorkshire. As a trusted bottler in the soft drinks industry, we are committed to delivering high-quality beverage and packaging solutions, with integrity and responsibility. Operating from a single, well-equipped campus, we proudly employ approximately 600 dedicated people, whose expertise and commitment drive our success.

Our business operates through key departments—Production, Warehousing, Engineering, Quality, and Administrative Support—ensuring efficiency, excellence, and adherence to ethical standards across all operations.

Although our operation is UK-based, elements of our supply chain for raw materials and packaging involve overseas sourcing. This presents an increased risk profile, requiring enhanced due diligence.

Policies and Governance

Cawingredients operates with integrity and transparency, reinforced by a framework of internal policies, that guide our ethical approach, including:

- Whistleblowing
- Anti-Slavery and Human Trafficking
- Recruitment and Selection
- Health & Safety
- Wellbeing
- Anti-Bribery
- Equality, Diversity, and Inclusion
- Supplier Code of Conduct

The responsibility for ethical due diligence is shared across key business functions, including Procurement, HR, and Sustainability, ensuring a comprehensive, strategic approach. Our commitment is reinforced at the highest level, with leadership sponsorship from the Chief Executive, demonstrating the importance of ethical stewardship.

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Risk Assessment and Due Diligence Processes

We are committed to long-term partnerships with suppliers built on transparency, accountability, and shared ethical values. We prioritise ethical sourcing and sustainable practices, fostering innovation and operational excellence, whilst reinforcing responsible business conduct throughout our network. Importantly, we expect our partners to uphold these principles and cascade them across their own supply chains, ensuring a collective commitment to integrity and sustainability. We communicate this through our Supplier Code of Conduct, which must be signed by all packaging and ingredient suppliers.

We prioritise recruiting permanent employees as a key measure to mitigate the risk of human trafficking. However, certain operational needs require additional labour support and as a result, we engage temporary agency workers from time to time. Recognising the potential risks associated with this practice, we take proactive steps to ensure compliance and ethical standards. We vet our agency partners, selecting only those that align with our expectations to adherence with ethical standards. Additionally, we exclusively work with agencies that are registered members of the Gangmasters and Labour Abuse Authority (GLAA), ensuring alignment with industry best practices and regulatory requirements. All temporary workers are informed of their employment rights and have access to grievance and whistleblowing mechanisms, without fear of retaliation.

Effectiveness and KPIs

We monitor the effectiveness of our modern slavery controls through:

- Completion rates of modern slavery training for relevant employees
- Suppliers signing to agree to meet the requirements of our Code of Conduct, ensuring they meet the requirements of the ETI Base Code and that they conduct ethics meetings with larger suppliers.
- Agency compliance checks and GLAA verification. Findings are reviewed by senior management and collaborative action is taken through continuous improvement.

Training and Capacity Building

As part of our ongoing commitment, we continually enhance our understanding of emerging trends and challenges in combating modern slavery. To strengthen our stance, we have:

- Continued to offer training initiatives to managers, HR, and relevant procurement colleagues, to ensure our managers and recruitment teams can identify, prevent, and report any signs of modern slavery.
- Engaged with external partners to further develop our procurement team's ability to foster stronger, more ethical supplier collaborations.

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Future Priorities

Over the next 12 months, we will further refine and strengthen our procedures, embedding robust safeguards, that reinforce our unwavering ‘zero-tolerance’ stance against modern slavery and trafficking. Through continuous improvement, proactive engagement, and heightened accountability, we aim to enhance the integrity of our operations and supply partnerships. We are also committed to ongoing participation in a third-party ethical audit, alongside annual independent financial audits, to validate compliance and drive continuous improvement. We have upgraded our SEDEX Membership to allow us to assess modern slavery risk across our supply chain by considering labour intensity, use of temporary labour, geographic sourcing, and industry-sector risk. Where required, we will work with suppliers, to help them improve their SAQ scores and undertake any corrective actions following social audits.

Approval Statement

This statement, approved by the Board of Directors, will be clearly communicated to all employees, fostering awareness and collective responsibility in our mission to eradicate exploitative practices and uphold the highest human rights standards across our organisation.



Richard Harrison
Chief Executive
19/05/2026

