

# Modern Slavery Statement 2025

## **Oscar Mayer Modern Slavery Act Statement 2025**

We are committed to tackling modern slavery, both in terms of our own business operations and within our supply chain. Our ambition is to raise awareness of the issue throughout our direct and indirect employee base, whilst undertaking due diligence to identify and prevent the risk to people in our business and supply chain through appropriate checks.

This statement sets out Oscar Mayer Group's absolute commitment to minimising potential modern slavery or human trafficking risks in its business and supply chains, whilst ensuring that we meet the requirement of section 54 of the Modern Slavery Act 2015.

This statement relates to the financial year 2024-25 and is prepared in accordance with the Modern Slavery Act 2015 and its definition of modern slavery, including human trafficking.

### **Overview of our business and supply chain**

Oscar Mayer Group supplies chilled ready meals and convenience food products to the major UK supermarkets and has a small food service division. The business directly employs over 2,200 employees at three UK based sites, with a pool of agency workers to provide operational cover.

Oscar Mayer Group consists of the following businesses:

- Oscar Mayer Limited
- Rowan Foods Limited – Oscar Mayer Limited
- Ferndale Foods Limited – Part of the Oscar Mayer Group

We prepare over 2.4 million chilled ready meals per week by combining and cooking select ingredients before packaging and chilling the meals ready for delivery to our customers. This is made possible by responsibly sourcing ingredients and packaging from a global supply chain located in over 10 different countries. During the year we have initiated a new format for mapping of our tier 1 supply chain through direct engagement with our suppliers.

Our Chief Executive Officer has overall responsibility for compliance with human rights and modern slavery laws and best practice, with oversight from the board of Directors. Responsibility for managing our approach to human rights and modern slavery is delegated to the ESG Committee. Our ESG committee comprises representatives from Human Resources, Commercial, Technical, Operations, Health and Safety, Engineering, and Finance to ensure we are tackling issues holistically, and our approach is aligned to our purpose, values and policies.

## **Organisational policies**

We are committed to ensuring people are treated with dignity and respect. Our approach is based on the United Nations Guiding Principles on Business and Human Rights (Guiding Principles) as supported by the UK Government. We aim to recognise and manage the risk of harm associated with unsatisfactory working conditions, discrimination, modern slavery, human trafficking and forced or bonded labour.

Oscar Mayer operates the following policies that describe its approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operation:

**Oscar Mayer Human Rights Policy** - details our commitments, and expectations, in relation to Oscar Mayer Ltd and human rights, and how we implement these across our operations. The policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labour Organisation's 1998 Declaration on Fundamental Principles and Rights at Work.

**Oscar Mayer Recruitment** – The company seeks to reduce agency provided labour, where possible and offer the opportunity of permanent employment. Prior to commencement of employment, all employees will be expected to demonstrate a right to work in the UK. The Oscar Mayer Recruitment process is compliant with all UK legislation.

**Responsible Use of Labour Providers** – Oscar Mayer will only contract with labour providers which have an identifiable and legitimate business entity. Legal status shall be determined in accordance with national law and practice. Oscar Mayer will conduct appropriate due diligence checks to seek to ensure that the labour provider is compliant.

**Oscar Mayer Code of Conduct** – details the relevant laws and other regulatory requirements but more importantly, it sets out the moral and ethical rules that apply to everyone who works for and with Oscar Mayer.

**Oscar Mayer Sourcing Code of Conduct** – The company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, act ethically and within the law in their use of labour.

As part of the supply chain and labour provider process, all potential and existing key Tier one suppliers will be assessed on their suitability as a supplier. Key Tier one suppliers will be expected to provide evidence of compliance with our Code of Practice, which requires them to:

- Participate in ethical trading audits / assessments.
- Provide employees with good working conditions, fair treatment and reasonable rates of pay.
- Respect workers' human rights and comply fully with all applicable laws.

The company also requires that:

- All work must be voluntarily and not done under any threat of penalties or sanctions.
- Workers must not pay any deposits for work.
- Involuntary labour is prohibited, and workers must be free to leave work at any time with all outstanding monies paid to them.

**Whistleblowing policy** – this outlines the responsibilities and mechanisms for reporting any wrongdoing within Oscar Mayer or our supplier's activities.

We have a comprehensive set of internal policies that support the prevention of modern slavery and are available to our employees, including:

- Drug and alcohol policy
- Equality and diversity
- Equal Opportunity Policy
- Dignity at Work
- Parental Policies (Maternity, Paternity, Adoption, Shared Parental leave)
- Disciplinary Policy
- Grievance Policy
- Health and safety
- Sickness absence policy

These policies are reviewed annually by the People and Development team following consultation with appropriate stakeholders (i.e. Group HSE Director for Health & Safety matters). The review checks the policies are still fit for purpose and include updates to align to legislation and to ensure Oscar Mayer's viewpoints are clearly defined.

## **Assessing and managing risk**

The main areas of modern slavery risk are our direct employment and indirect recruitment through our supply chain partners. We use Supplier Ethical Data Exchange (SEDEX) risk assessments and audits across our own and supplier sites to assess ethical risks.

Oscar Mayer is an AB (Buyer/Supplier) member of the SEDEX. This enables us to understand standards of labour, health and safety, environmental performance, and ethics at our own and supplier sites. As an AB SEDEX member, Oscar Mayer has

access to the SEDEX (Supplier) Risk Assessment Tool (RADAR) for evaluating our supply chains. This assessment yields outcomes such as Site Characteristics Rating, Inherent Risk Rating, and Combined Overall Risk Rating categorised as low, medium, or high risk.

**Oscar Mayer:** All of our manufacturing sites are registered with SEDEX and have completed a self-assessment questionnaire.

Our manufacturing sites are regularly independently audited as part of a SEDEX Members Ethical Trade Audit (SMETA). Any non-conformances originating from these audits are closed out within the specified timescale. We share the results of SMETA assessment with customers through the SEDEX platform.

During the year our site at Flint received an unannounced 2-day SMETA assessment. Throughout the 2-day audit, 1 non-conformance was identified that has now been addressed and closed out. At the close of the audit, the auditor was incredibly complimentary about our business, the people and the numerous examples of good practice that he identified

**Suppliers:** We require that tier 1 suppliers are registered on SEDEX and provide us visibility into their Self-Assessment Questionnaires (SAQs) and ethical audits, enabling us to utilise RADAR to assess supplier information.

## **Due diligence in relation to modern slavery (including approach to remediation)**

All employees hired directly on behalf of the company will have legal and appropriate right to work checks completed before and on the day of employment. Bank details will be checked against the name of the worker to ensure the monies owed will be paid into the correct account. Once in the business and on the first day of employment, all staff have to complete mandatory training, including a Modern slavery Awareness course. Employees will then have regular check in with their managers on how everything is going after the initial onboarding process.

Labour providers are selected through our procurement process to ensure appropriate due diligence checks. This includes a more pro-active approach aimed at looking at preventative measures rather than reactive measures and remedial action.

Supply chain due diligence – as part of our supplier selection, onboarding and management processes we monitor the ethical performance of our suppliers through the SEDEX platform.

## **Reporting concerns**

We take our responsibility to remain alert to the potential for modern slavery issues both internally and within our supply chain very seriously. To maintain our vigilance,

we promote our whistleblowing policy and the independent, confidential Navex whistleblowing hotline (0800 069 8234) to our colleagues and suppliers. Colleague communication is made available in multiple languages to take account of our diverse workforce.

If we are made aware of any incidence of modern slavery we will review and identify actions to improve our processes and ensure the right action is taken. During 2025 we will review and amend our approach to remediation of potential incidents of modern slavery.

### **Training and capacity building**

We have an inhouse Learning and Development team who are experts at delivering a wide range of topics. Oscar Mayer provides all permanent new starters with an induction programme which covers Modern Slavery Awareness. It is discussion based and highlights the key indicators to be aware of, locations of posters and confidential helpline. Additionally, Oscar Mayer will continue to raise awareness amongst the workforce using Stronger Together and other relevant forms of communication.

### **Collaboration**

Many of our customers are sponsors of the Stronger Together UK Consumer Goods project that provides suppliers, like ourselves, with access to training and resources to tackle modern slavery. We use the Stronger Together resources to assess our progress in addressing modern slavery and make the Stronger Together helpline visible to our employees.

During the last 12 months three members of our Human Resources team have completed the Stronger Together Tackling Modern Slavery in Businesses - UK and ROI course. In addition, a member of our supply approval and integrity team attended the Effective Human Rights Due Diligence in Supply Chains training delivered by Stronger Together.

### **Monitoring and evaluation**

To monitor our progress in managing our approach to modern slavery we use the following key performance indicators:

Measure	Target	2024-25 performance
Percentage new starters completing modern slavery awareness training	100% each year	100%
Percentage of tier 1 suppliers actively linked to Oscar Mayer on SEDEX	Target under review	97%
Percentage of tier 1 suppliers with complete SAQ	Target under review	72%

Overall SEDEX SAQ Labour Standards Management control score	Target under review	2.9/5 (moderate)
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During 2025-26 we aim to set targets for our supplier SEDEX measures.

We understand that the risks associated with modern slavery are constantly evolving. We remain committed to the prevention of Modern Slavery. We know there is more to do within our organisation, our supply chain and in collaboration with other organisations to raise awareness of and mitigate against the risk of modern slavery.

This statement was reviewed and approved by the Board of Directors on 17<sup>th</sup> July 2025.

Signed:



Ian Toal, Chief Executive Officer