

Modern Slavery Statement 2026

Oscar Mayer Modern Slavery Statement 2026

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 2025-26 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 2,000 employees at three UK based sites, with a pool of agency workers to provide operational cover.

Oscar Mayer Group has two main subsidiaries: Oscar Mayer Limited and Ferndale Foods Limited.

We prepare over 2.6 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 of 149 suppliers located in over 25 different countries. To gain further clarity on the location, and potential modern slavery risk, in our supply chain we are initiating a process in our quality management system to map our Tier one 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, child labour, 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 operations:

Oscar Mayer Human Rights Policy - Details our commitments, and expectations, in relation to Oscar Mayer Group 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 agreement with our Code of Conduct, which requires them to:

- Participate in ethical trading assessments and audits where necessary.
- 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 – 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:

- Dignity at Work Policy
- Disciplinary Policy
- Drug and Alcohol Policy
- Equality and Diversity Policy
- Equal Opportunity Policy
- Grievance Policy
- Health and Safety
- Parental Policies (Maternity, Paternity, Adoption, Shared Parental leave)
- Sickness Absence Policy

These policies are reviewed annually by the People and Development team following consultation with appropriate stakeholders. Reviews check 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 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 sites at Erith and Wrexham received semi-unannounced 3-day SMETA assessments. Across the sites a total of eight non-conformances were identified. Three non-conformances are still being resolved and will be completed by June 2026. The other non-conformances have been addressed and closed out.

Suppliers: We require that Tier one 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 first 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 must 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 and regular check-ins throughout their tenure.

Labour providers are selected through our procurement process to ensure appropriate due diligence checks. Regular audits are undertaken to ensure compliance with Oscar Mayer's Modern Slavery approach. 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 reviewed our approach to remediation of potential incidents of modern slavery. The company has achieved this through in-depth audit procedures, vigorous bank verification checks and a regular policy update in line with Employment Law and trends.

Training and capacity building

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 details of confidential helplines. Refresher courses are included in our factory training programme. 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.

We are members of the Modern Slavery Intelligence Network (MSIN), an innovative collaboration across food sector participants aiming to proactively share intelligence to enhance their effectiveness in disrupting modern slavery and labour exploitation within the UK. In February 2026 our Chief People & Corporate Affairs Officer, Sarah Hill, has been appointed to the board of the MSIN.

Modern Slavery Intelligence Network (MSIN)

The Modern Slavery Intelligence Network is a groundbreaking non-profit collaboration in the UK food and agriculture sector, created in response to the findings of [Operation Fort](#), the UK's largest ever modern slavery investigation. MSIN facilitates the sharing of anonymised intelligence across its members to understand patterns and trends of modern slavery within the sector.

Membership of MSIN enhances an organisation's ability to identify, prevent, and respond to human rights abuses across its operations and supply chains. By participating in a trusted intelligence-sharing community, members gain access to expert insights, practical tools, and a safe environment for open dialogue that would otherwise be difficult to find. Exploitation isn't just displaced across the sector but truly disrupted.

Shared visibility enables earlier detection of emerging threats and a more informed response, leading to stronger governance, robust risk assessments, and effective remediation pathways. Membership also highlights a commitment to transparency and continuous improvement.

Over the last year, data sharing has accelerated, driven by streamlined processes for submitting information, more intelligence reports from members, and new organisations joining the network.

In September, one MSIN member reported a suspicious online recruitment channel. That same day, another MSIN member shared intelligence about two other suspicious labour providers. Both these labour providers and the recruitment agency were registered at the same address, pointing to a potential organised crime link that would not have been spotted but for the information-sharing facilitated by MSIN. This has the potential not only to prevent members from working with illicit agencies and labour providers, but also to disrupt an organised crime network exploiting individuals within the UK's food and agriculture sector.

Ultimately, MSIN empowers organisations to act with greater confidence in their fight against modern slavery by turning information into meaningful action. Participation demonstrates that tackling exploitation requires collaboration, vigilance, and shared responsibility.

Monitoring and evaluation

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

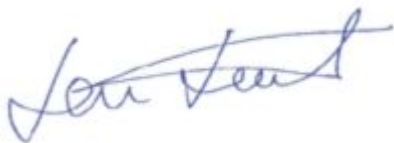
| Key Performance Indicator | Target 2030 | 2025-26 performance | 2024-25 performance |
|--|---------------|---------------------|---------------------|
| Percentage new starters completing modern slavery awareness training | 100% annually | 93% | 100% |
| Percentage of tier 1 suppliers actively linked to Oscar Mayer on SEDEX | 100% | 96% | 97% |
| Percentage of tier 1 suppliers with complete SAQ | 95% | 87% | 72% |
| Overall SEDEX SAQ Labour Standards Management control score | 3.1/5 | 2.9/5 | 2.9/5 |

During 2025-26 we have reviewed our use of the SEDEX platform and how our suppliers report their performance to us. We have set targets, out to 2030, to improve our supply chain monitoring and performance through the SEDEX platform.

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 21st May 2026.

Signed:



Ian Toal, Chief Executive Officer