

# MODERN SLAVERY STATEMENT

1 September 2024 – 31 August 2025





## DECLARATION

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Fox's Burton's Companies (FBC) UK Limited ("FBC UK") for the period 1 September 2024 to 31 August 2025 to prevent modern slavery and human trafficking in its own business operations and supply chain.

## INTRODUCTION

**Modern Slavery is a criminal act and a violation of human rights. At FBC UK we take a zero-tolerance approach to Modern slavery, condemning it in all forms including forced labour, forced marriage, debt bondage, forced commercial sexual exploitation, human trafficking, slavery like practices, sale and exploitation of children and the removal of freedoms. As a business with a global supply chain, we recognise that we have a responsibility to take a robust approach to preventing slavery and human trafficking. FBC UK is committed to ensuring all our business and partners are free from slavery and human trafficking.**

We recognise that having the right governance framework to address human rights and ethical behaviours is fundamental to managing the risk of modern slavery in our business and supply chains. Responsibility for overseeing FBC UK's approach to preventing modern slavery is held by our Chief People & Organisation Officer. According to the UN Agency - International Labour Organization, the latest global estimates indicate that 50 million people were living in modern slavery in 2021. Of these people, 28 million were in forced labour and 22 million were trapped in forced marriage. Unfortunately, the number of people in modern slavery has risen significantly in the last five years. In 2021, 10 million more people were in modern slavery compared to 2016 global estimates.

Key actions taken in our financial year ending 31 August 2025

**Established a central coordinating sustainability function and new governance structure including an ESG Council of executive board and cross-functional senior leaders**

**Established a Human Rights and Modern Slavery working group comprising executive board and senior representation from Sustainability, Legal, Procurement, Quality, and People and Organisation functions.**

**Appointed Unseen, anti-slavery charity to provide expert consultancy**

**Completed with Unseen, a gap analysis of FBC's Human Rights and Modern Slavery Strategy**

**Created a three-year plan to reduce modern slavery risks in our operations and value chain**

**Developed an ESG risk register and identified human rights and modern slavery risks and mitigations**

**Completed 22 training days with Stronger Together focused on Tackling Hidden Worker Exploitation and Responsible Recruitment**

**Introduced a new Environmental, Social and Governance (ESG) policy**

## FBC UK: OUR BUSINESS AND STRUCTURE

FBC UK proudly brings together two of the nation’s most iconic biscuit manufacturers—Fox’s and Burton’s—whose combined heritage dates back to 1853. Formed through the merger of Fox’s and Burton’s, FBC UK is home to a portfolio of beloved brands, including Fox’s Biscuits, Burton’s Biscuits, Maryland Cookies, Jammie Dodgers, Party Rings, Wagon Wheels, Paterson’s, Thomas Fudge’s, Lyons Biscuits, and Brontë.

Our team consists of just under 3,800 dedicated colleagues working across the UK, with manufacturing facilities in Llantarnam, Edinburgh, Blackpool, Dorset, Livingston, Arran, Kirkham, and Batley, as well as a central distribution hub in Liverpool. During the financial year ending 31 August 2025, FBC UK’s head office was located in St Albans. In February 2026 the head office relocated to St Pauls, London. In addition to our permanent workforce, we engage temporary staff through reputable labour agencies and outsource certain services to trusted third-party providers, such as our central distribution hub.

FBC UK collaborates with a diverse network of suppliers, both within the UK and globally, to source raw materials and packaging. Our suppliers range from small and medium-sized enterprises to large multinationals, each with their own supply chains. We source ingredients from 36 countries and our products reach customers in over 55 countries worldwide.

At FBC UK our Core Values are central to our way of doing business and provide us with the foundations for our strategies. They enable us to achieve success in the right way:

Our core values are:

**Respect and Responsibility**

**Loyalty and Trust**

**Integrity and Moderation**

**Entrepreneurship**

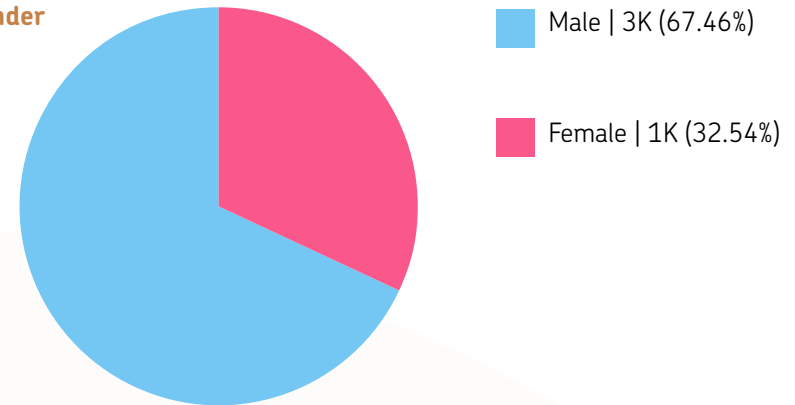
**Passion for Quality, Research and Innovation**

**Work, Create, Donate**

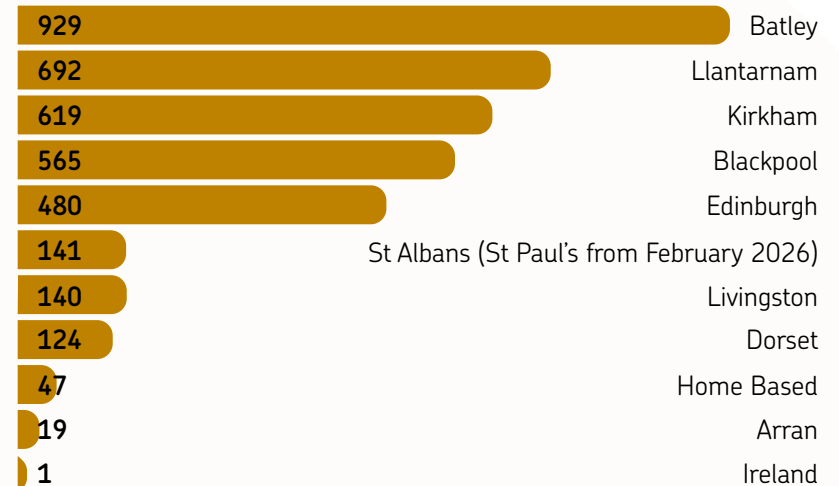
### Workforce

During the year FBC UK employed 3,757 people. The gender split was 32.54% female and 67.46% male. Approximately 562 full time equivalent workers were employed on a temporary basis via eleven contractor agencies. This is to fulfill seasonal work relating to Christmas bakery orders. While we acknowledge this increases the risk associated with modern slavery, robust processes and procedures are in place as part of our contracts with agencies.

#### Gender



#### Location



## Risk overview

The table below sets out modern slavery risks and mitigations identified by FBC UK. Key actions taken in our financial year ending 31 August 2025

Risk	Cause – Contribute / Linked	Touchpoints / Relationship to the Risk	Mitigations
1. Agency labour exploitation in UK sites	Contribute	Labour providers, onsite supervisors, time & attendance, payroll, worker housing/ transport	To ensure safeguarding, FBC UK operates a robust approach to recruitment via agencies. These include: <ul style="list-style-type: none"> <li>- no recruitment fees are paid by agency workers</li> <li>- Speak Up policy for all workers</li> <li>- worker interviews Immediate safeguarding; conduct</li> <li>- contract only with GLAA-licensed providers</li> <li>- unannounced audits</li> <li>- opportunity for agency workers to apply for permanent in house roles</li> <li>- enforce Responsible Recruitment clauses</li> <li>- manager training through Stronger Together</li> <li>- track KPIs (turnover, deductions, grievances)</li> </ul>
2. Palm oil plantation labour (forced/child labour)	Linked	RSPO supply chain (segregated)	FBC UK procures only RSPO Segregated Palm Oil and works closely with its Palm Oil suppliers to map its supply chain to mill. All our suppliers are SEDEX registered and we conduct supplier due diligence. Suppliers are required to comply and implement the FBC UK Supplier Code of Conduct and apply the same principles FBC UK has committed to in the key prioritised areas including Child Protection and No Child Labour, No Forced Bonded and Compulsory Labour, Fair Wages, Working Hours, Diversity and Inclusion, No Discrimination and Harassment and Health and Safety
3. Cocoa/chocolate labour (child labour, trafficking)	Linked	Cocoa traders, chocolate processors, certification schemes, smallholders	47% of FBC UK cocoa is procured through a certified scheme (Fairtrade, Rainforest Alliance, Cocoa Horizons). The business ambition is to procure 100% cocoa through sustainability schemes and has a roadmap to achieve this. All our suppliers are SEDEX registered and we conduct supplier due diligence. Suppliers are required to comply and implement the FBC UK Supplier Code of Conduct and apply the same principles FBC UK has committed to in the key prioritised areas including Child Protection and No Child Labour, No Forced Bonded and Compulsory Labour, Fair Wages, Working Hours, Diversity and Inclusion, No Discrimination and Harassment and Health and Safety
4. Other agricultural inputs (wheat, sugar, flavours)	Linked/Contribute	UK & EU farms, seasonal labour programmes, brokers	We have long standing key commodity suppliers with whom we work closely to reduce the risk of modern slavery in the supply chain. All our suppliers are SEDEX registered and we conduct supplier due diligence. Suppliers are required to comply and implement the FBC UK Supplier Code of Conduct and apply the same principles FBC UK has committed to in the key prioritised areas including Child Protection and No Child Labour, No Forced Bonded and Compulsory Labour, Fair Wages, Working Hours, Diversity and Inclusion, No Discrimination and Harassment and Health and Safety
5. Packaging (paper/card/plastics) labour risks	Linked	Pulp mills, converters, printers, resin producers	All our paper is required to be FSC certified or equivalent. All our suppliers are SEDEX registered and we conduct supplier due diligence. Suppliers are required to comply and implement the FBC UK Supplier Code of Conduct and apply the same principles FBC UK has committed to in the key prioritised areas including Child Protection and No Child Labour, No Forced Bonded and Compulsory Labour, Fair Wages, Working Hours, Diversity and Inclusion, No Discrimination and Harassment and Health and Safety
6. Cleaning & security (outsourced services)	Contribute/Linked	FM contractors, night shifts, subcontracting layers	To ensure safeguarding, FBC UK operates a robust approach to recruitment via third party providers. These include: <ul style="list-style-type: none"> <li>- no recruitment fees</li> <li>- Speak Up policy for all workers</li> <li>- Worker interviews</li> <li>- contract only with GLAA-licensed providers</li> <li>- enforce Responsible Recruitment clauses</li> </ul>
7. Logistics & transport	Linked/Contribute	Hauliers, 3PLs, cross border carriers, warehouses	FBC UK operates responsibly by: <ul style="list-style-type: none"> <li>- setting realistic lead times</li> <li>- banning excessive hours via contract</li> <li>- require ELD/tachograph compliance</li> <li>- requiring 3PL providers to operate grievance hotline/route</li> </ul>

## GOVERNANCE

During the year, a central coordinating sustainability function and new governance structure were created, led by the Chief Procurement & Sustainability Officer, which includes a bi-monthly ESG Council of executive board and cross-functional senior leaders chaired by a newly established role of Director of Sustainability & External Communications. To embed sustainability within the business, a working group structure was established under the key pillars of Planet, Product and People with executive board sponsors and senior leadership chairs. Comprising cross functional membership, the ESG working groups form the basis of the foundational structure of sustainability within the business, intended to ensure accountability and delivery is driven throughout the organisation.

The Human Rights and Modern Slavery working group, under the People pillar, was established and comprises executive board and senior leadership across Sustainability, Legal, Human Resources, Procurement and Food, Safety & Quality (FSQ) functions. The Chief People and Organisation Officer is the executive board member responsible for Modern Slavery.

### Policies, processes and frameworks

FBC UK has developed a suite of policies to ensure ethical business practices are followed and these are supported by further procedures and guidance. Our approach is guided by international conventions and standards, including the Ethical Trading Initiative (ETI) Base Code, United Nations Guiding Principles (UNGP) and International Labour Organization (ILO) Convention.

### Supplier Code of Conduct

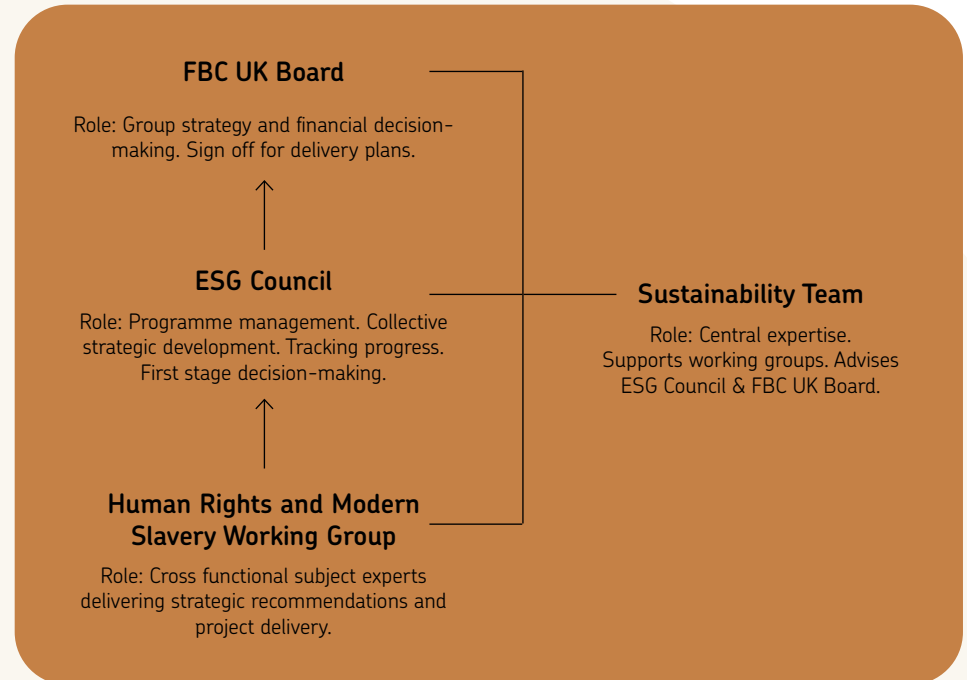
FBC UK's core philosophy is inspired by a solid commitment to ethical conduct and integrity. With this in mind, FBC UK commits to ensuring it and its partners and suppliers, adhere to strict ethical standards. FBC UK recognises the value of third parties such as our suppliers, trade partners, distributors and vendors and through our Supplier Code of Conduct, we invite them to be united in our core philosophy, by sharing our expectations in terms of products safety, quality, sustainability, and business ethics, on a global scale. The Supplier Code outlines our expectations in terms of compliance with laws, anti-trust, GDPR, anti-bribery and corruption and conflict of interest. The Supplier Code of Conduct can be found on our intranet for all employees and on our website [FBCUK Code of Conduct 10424 v1 2](#). Part of our supplier set up includes ensuring suppliers agree to abide by our Supplier Code of Conduct. We reserve the right to terminate our relationship with individuals or organisations working with us or on our behalf if they breach our ethical policies.

### Human Rights Policy

This policy reflects our commitment to respecting and promoting human rights and preventing and mitigating any adverse impact of our operations, through a due diligence-based approach to human rights. Our approach is guided by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labour Organization (ILO) Fundamental Labour Conventions. If there is a conflict between these international standards and applicable laws, we comply with the applicable laws, while seeking ways to honour these international standards. The policy can be found on our website: [FBC UK Human Rights Statement 010424 v1.pdf](#)

## FBC ESG WORKING GROUPS

Planet Workstream	Products Workstream	People Workstream
Exec Sponsor: COO	Exec Sponsor: Chief Growth Officer Chief Procurement & Sustainability Officer	Exec Sponsor: Chief People and Organisation Officer
Bakery Decarbonisation & onsite bio-diversity	Sustainable Nutrition	Human Rights & Modern Slavery
Transport & logistics	Sustainable Packaging	Community Social Impact
Waste & water	Sustainable Sourcing & Supplier Engagement	Health & Wellbeing
Renewable Energy & Infrastructure		Diversity, Equity & Inclusion



### Speak-Up Policy

We want to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery is taking place in our own business or wider supply chain.

This whistleblowing policy, known as Speak-Up policy, sets out various methods by which employees, suppliers and third parties can raise concerns about internal practices, employment standards or ethics. Whilst we always encourage concerns to be reported directly to management or their People and Organisation team, where appropriate, FBC UK also provides a confidential hotline via both phone and web, which is available 08:00-18:00 Monday to Friday with an answerphone out of hours - and can be accessed online and by phone: 0800 111 6302 or [SpeakUpFBC-UK@paradedirect.co.uk](mailto:SpeakUpFBC-UK@paradedirect.co.uk)

The hotline is operated by an independent external organisation. Any concerns reported via the hotline or through line management are referred to the Chief People & Organisation Officer and the Chief Legal Officer. All matters are treated in the strictest confidence and investigated as quickly and thoroughly as possible.

No concerns related to modern slavery were raised in the financial year ending 31 August 2025.

### Grievance Policy

The aim of the policy is to enable and maintain excellent employee relations at all levels. However, when an employee has a problem or concern about their work, their working conditions or relationship with colleagues the purpose of this Policy is to help guide them through a process to enable the Company to handle grievances fairly and in a timely manner.

### Environmental, Social and Governance (ESG) Policy

We are committed to integrating robust Environmental, Social, and Governance (ESG) principles into every aspect of our operations. We recognise that our responsibilities extend beyond delivering high-quality products to our customers and consumers; we are dedicated to contributing positively to the environment, society, and complying with all relevant sustainability regulations. The Environmental, Social & Governance (ESG) policy outlines our commitment to sustainable and ethical practices that align with our core values and business objectives. It was communicated to employees via internal communication channels in November 2024 and is available to all employees on noticeboards and on our intranet and externally via our website [FBC UK POLICY - ESG](#).

### Policy Implementation and training

Each policy is assigned to a policy owner who is responsible for ensuring the policy is kept up to date and is properly implemented. We have a dedicated space on our intranet called the 'Compliance Hub' where employees can refer to policies and helpful notes.

Policies are reviewed annually.

On joining the business, new starters are required to read key policies and undertake an induction programme. During the year we enhanced our suite of training programmes with new programmes both online and face to face.

Members our People and Organisation teams at both head office and site level have attended Modern Slavery workshops run by Stronger Together, a not-for-profit organisation. The focus of the training workshops are to help attendees understand the responsibilities and best practice associated with tackling modern slavery in UK businesses and to enable them to better identify instances of modern slavery should they exist in the workforce. In addition, members of our Human Rights and Modern Slavery Working Group have attended Stronger Together workshops on Tackling Modern Slavery in Businesses – UK & ROI and Effective Human Rights Due Diligence in Supply Chains.



## FBC UK LOCATIONS



## OPERATIONS

### Audits

We are members of the Supplier Ethical Data Exchange (SEDEX), driving responsibility and visibility in the supply chain. As part of our commitment to meet the same standards that we are asking of our supply chain, all our manufacturing sites are required to complete Sedex self-assessment questionnaires. All FBC UK bakery manufacturing sites have been successfully audited against the SEDEX Members Ethical Trade Audit (SMETA) 2 or 4 Pillar audit standard. This is completed on a two to three-yearly rotation. Three bakery sites were audited in the financial year ending 31 August 2025. For transparency, these audit reports are published on the SEDEX platform, so that our customers can view with whom we have been requested to link and share our data.

We are constantly reviewing processes in place and actions required to reduce all strategic risks associated with modern slavery, where economically possible. We have a robust recruitment process to ensure all right to work documents are checked before someone joins to ensure compliance.

We undertake checks on employee's bank accounts to identify any instances of multiple employees linked to one account. We continue to raise awareness in the business and have included additional information in our induction and employee learning platform.

#### 1 **Edinburgh**

Home to Viscount, Fruit Shorties, Royal Edinburgh Shortbread

#### 2 **Livingston**

Home to Paterson's Shortbread

#### 3 **Isle of Arran**

Home to Arran Fine Foods

#### 4 **Blackpool**

Home to Maryland Cookies

#### 5 **Kirkham**

Home to Rocky biscuits, Party Rings, Crunch Creams

#### 6 **DHL Liverpool**

Home to our Distribution Centre

#### 7 **Batley**

Home to Viennese Chocolatey range, Fox's Cookies, Jam 'n' Cream

#### 8 **Llantarnam**

Home to Jammie Dodgers, Wagon Wheels, Savoury Crackers

#### 9 **St Albans**

Home to Head Office (until January 2026)

#### 10 **Dorset**

Home to Thomas Fudge's Florentines

## SUPPLY CHAIN

### Due Diligence on Suppliers and Collaboration

As a biscuit manufacturer, we have a large number of suppliers of ingredients, packaging and services. To ensure best practice throughout our supply chain, we have a comprehensive supplier and material approval review procedure. We request that all suppliers be members of SEDEX (the Supplier Ethical Data Exchange).

As members of SEDEX we actively monitor the ethical standards which we, and our suppliers, adhere to and it is the preferred method for ongoing assessment of our supply base. Approximately 97% of our ingredient and packaging supply base is SEDEX registered, with remaining suppliers further screened on ethical standards prior to approval.

We also request supply chain maps from our key suppliers that will show the route of the ingredients from source to delivery to ourselves. Our trading terms also require suppliers to perform services in accordance with ethical trading initiatives and industry standards and to adhere to our Code of Conduct.

FBC UK has long recognised the benefits of using ethically and sustainably sourced raw materials. We also only source cocoa based products from suppliers and/or supplier's suppliers that are members of the ICI (International Cocoa Initiative) or the WCF (World Cocoa Foundation). The ICI supports schemes and organisations that are working to eradicate child labour in the cocoa sector and the WCF funds work to ensure the sustainability of the cocoa industry through programmes such as The Sustainable Tree Corps Program and also helps improve the livelihood of cocoa farmers.

100% of direct palm oil sourced for our products is segregated and certified by the Roundtable on Sustainable Palm Oil (RSPO). Their requirements include respecting the rights of indigenous peoples and local communities and respecting workers' rights and conditions within palm oil plantations.

47% of cocoa is sustainably sourced through third party certification schemes including Fairtrade and Rainforest Alliance and supplier schemes such as Cocoa Horizons. These schemes are designed to address a wide range of human and labour rights issues by providing decent livelihoods and working conditions, freedom of Association and collective bargaining, child protection, gender equality and environmental rights. FBC UK is working towards achieving 100% sustainably sourced cocoa.

### Supply Chain mapping

FBC UK works with more than 200 active direct suppliers across ingredients, packaging, and indirect procurement categories. The current Level-1 supplier portfolio is split approximately as follows:



Level-1 suppliers are predominantly located in the UK and EU, reflecting the regional supply chain structure and proximity requirements for core materials.

However, the true scale and complexity of the supply base is significantly higher. Many suppliers operate through multiple manufacturing locations, and may also use agents, traders, or brokers. When these additional sites and intermediaries are included, the total number of active supplier entities exceeds 500.

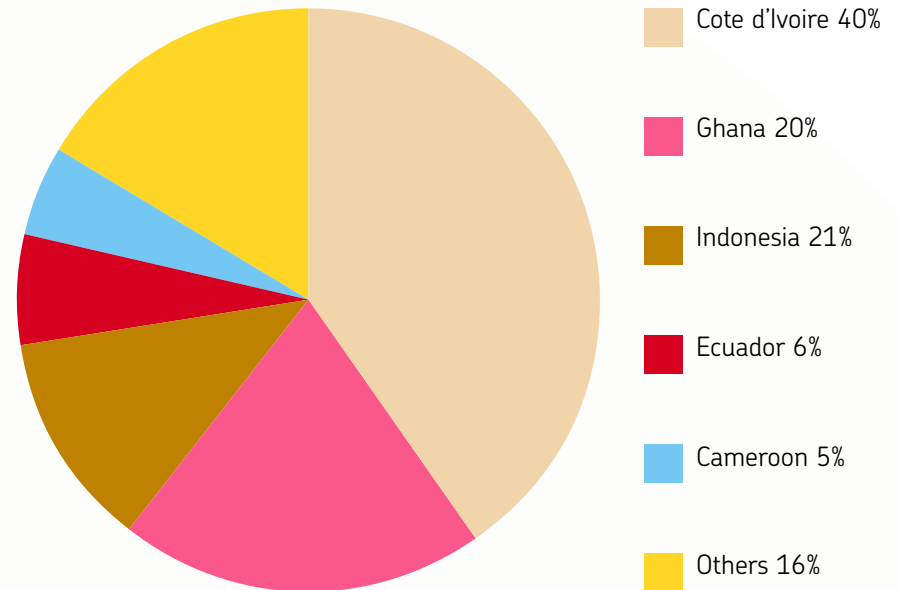
Limited supply chain mapping for modern slavery risks is conducted. A comprehensive full supply chain mapping project is underway with the support of Unseen, our modern slavery consultancy and will be completed in the next financial year.

### Key commodity risk

#### Cocoa

There are an estimated 5 to 6 million cocoa farmers in the world and 90% of all cocoa is grown by farm smallholders with less than 5 hectares of land. Traceability is a significant challenge and therefore cocoa is one of our highest risk commodities. (Bermudez et al., 2022). Key human rights risks relating to cocoa farming and production are child labour, forced labour and human trafficking, poverty and unfair wages, unsafe working conditions and gender inequality.

#### Cocoa producing countries



Data from 2022. Source FAO, 2024

At FBC UK our cocoa is sourced primarily from Cote d'Ivoire and Ghana. According to Walk Free Global Slavery Index 2023 there is an estimated prevalence of modern slavery occurring in 7.3 per 1000 of the population in Cote d'Ivoire with 193,000 people estimated to be in living in modern slavery. In Ghana this is estimated to be 2.9 per 1000 in the population and 91,000 in total in modern slavery. (Walk Free, n.d.) FBC UK is committed to achieving 100% sustainable cocoa through certification schemes.

**Palm Oil**

FBC UK has been sourcing 100% Roundtable on Sustainable Palm Oil (RSPO) segregated certified palm oil since 2012. Nevertheless, palm oil remains a high-risk commodity with human right abuses prevalent. In particular, child labour, forced labour and poor wages and working conditions. Our palm oil is predominately sourced from Papua New Guinea. The prevalence of modern slavery per 1000 in the population is 10.3 in Papua New Guinea. The estimated number of people in modern slavery in each country is 93,000. (Walk Free, n.d.) 100% of palm oil sourced through our key palm oil supplier is traceable to mill. Our supplier operates a Smallholder Inclusion programme and one of its key objectives is to strengthen smallholder capacity and livelihoods which is conducted through farmer training.

**Supplier or Third-Party risk assessment and due diligence**

All suppliers are required to be SEDEX registered and certified during the Supplier Approval process.

We monitor this by keeping the certification document on our supplier specification system and include this in our risk assessment of each supplier. This is reviewed bi-annually. SEDEX registration number, and geographic location is captured.

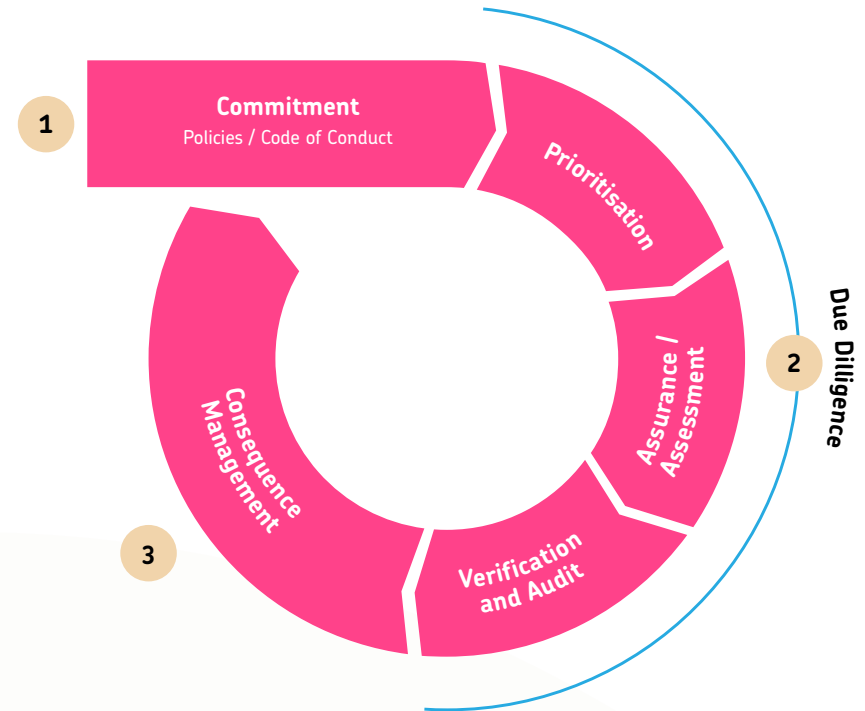
**Audits**

We have successfully passed third party audits which include checks on the systems we have in place to protect against modern slavery. We are pleased that we have not encountered any issues regarding this and as a company we are satisfied with the steps being taken.

That said we are continuously monitoring (together with our suppliers) what steps we can take to build on the initiatives we already have in place. We aim to understand the potential risks to human rights such as forced labour within our supply chain by using tools such as the SEDEX platform and audits where high risks are identified (SMETAs).

**Supplier Expectations**

We expect Supplier's to sign up to the FBC UK standard terms and conditions of purchase. The terms include clauses around SEDEX membership, compliance with laws and the requirement of suppliers to adhere to the Supplier Code of Conduct. Supplier data and questionnaire responses are validated through our Supplier Approval Process, supported by compliance expectations set out in our General Terms & Conditions. During onboarding, suppliers must provide evidence such as SEDEX registration and relevant certifications, which we review and then store within our supplier engagement specification system at both supplier and specification level for traceability. Ongoing validation occurs through our two-year re-approval cycle, where all documents are checked for continued accuracy and compliance, and updated evidence is requested if required. This ensures supplier information remains current and aligned with our contractual compliance requirements.



- 1 - Policies  
- Code of Conduct
- 2 - Key commodity assessment  
- Specific supplier assurance process agreements  
- SEDEX registration
- 3 - Supplier meetings and bespoke roadmap alignment

## GRIEVANCE, ESCALATION, AND REMEDIATION

As set out in our policies section, we have a Whistleblowing policy and procedure through our Speak Up line which is available to all employees and supplier employees.

To date we have not received any modern slavery cases or concerns. However, should any arise via our whistleblowing line Speak Up, these would be escalated to our Chief People and Organisation Officer and Chief Legal Officer. We would also seek advice from Unseen, our modern slavery consultancy. An escalation and remediation policy and procedure is scheduled in our three year action plan, set out below.

### Training and awareness

During the year 22 days of training was completed by People and Organisation employees in our bakeries and head office for modern slavery which included courses, conducted by Stronger Together for:

- Tackling Modern Slavery in Businesses - UK and ROI
- Effective Human Rights Due Diligence in Supply Chains

In addition, all new operational employees undergo Modern Slavery awareness training as part of their induction.

### How we measure the effectiveness of our modern slavery strategy

We are committed to ensuring that our modern slavery strategy is both robust and effective. To achieve this, we have established a suite of key performance indicators (KPIs) that are regularly tracked and reviewed. Over the past year, we have continued to monitor existing KPIs and introduced new ones to reflect the evolving nature of our programme and the risks identified.

These new measures allow us to broaden our training reach and deepen knowledge of high risk roles as well as identifying higher risk areas of our supply chain. These measures reflect maturity progress of our programme.

Effectiveness is reviewed quarterly through our Human Rights and Modern Slavery working group and annually by the ESG Council and the Executive Board. We analyse KPI trends, identify areas for action, and update our three-year roadmap accordingly. Any non-conformance or issues raised via our Speak Up channel are escalated to the Chief People & Organisation Officer and Chief Legal Officer, ensuring remediation aligns with severity.

We benchmark internally against previous years' data and externally against initiatives like Stronger Together and industry peer frameworks.

These KPIs are:

**100% of sites that have completed Stronger Together training**

**13% of sites that have completed the Modern Slavery Risk Assessment Action Plan**

**100% of sites that have completed an agency ethical audit every 12 months**

**0 number of whistleblower cases relating to Modern Slavery**

**n/a of whistleblower cases closed out**

**97% for 2024/25 on raw ingredient suppliers on Sedex**

We are introducing additional KPIs for the financial year ending 31 August 2026.

**100% of procurement team received bespoke Modern Slavery training**

**80% of supplier spend assessed for Modern Slavery risk**

Key Performance Indicator	Result 2023	Result 2024	Target 2025	Result 2025	Target 2026
% of sites that have completed Stronger Together training	90%	50%	100%	100%	100%
% of sites that have completed the Modern Slavery Risk Assessment Action Plan	25%	50%	100%	13%	100%
% of sites that have completed an agency ethical audit every 12 months	100%	100%	100%	100%	100%
Number of whistleblower cases relating to Modern Slavery	0	0	0	0	0
% of whistleblower cases closed out	n/a	n/a	n/a	n/a	
% of raw material suppliers registered on SEDEX	96.5%	98%	98%	97%	100%
<b>NEW KPIs for next financial year</b>					
% of procurement team received bespoke Modern Slavery training					100%
% of supplier spend assessed for Modern Slavery risk					80%

	Year 1 (FY 25/26)	Year 2(FY 26/27)	Year 3 (FY 27/28)
Governance	Review of memberships, standards, codes  Annual review of Human Rights Policy  Introduce Modern Slavery Policy		
HR, Recruitment & Worker Representation	Introduce Recruitment Policy and Procedure  Annual review of Whiteblowing (Speak-Up) Policy and procedure  Introduce a new Ethics Policy		
Grievance, Escalation and Remediation	Introduce annual Grievance Policy review	Introduce Escalation and Remediation process	
Procurement & Supply Chain	Review of current supply chain risk mapping and traceability  Independent inherent supplier risk mapping gap analysis  New Supplier Code of Conduct  Conduct supplier sustainability questionnaire	Introduce enhanced risk mapping recommendations  Enhanced risk assessment as part of supplier selection and onboarding  Develop auditing framework for suppliers  Develop Due Diligence framework for Supplier Code of Conduct	Introduce Sustainable Procurement Policy
Training & Awareness	Training for Modern Slavery, Grievance and Whistleblowing (Speak-Up) Policies  Communication of Supplier Code of Conduct  Independent role specific training, Procurement and FSQ teams	Escalation and Remediation process training  Develop Modern Slavery training for all new starters	Training for Sustainable Procurement Policy  Modern Slavery training for high risk suppliers  Develop Refresher course on Modern Slavery

## FUTURE OBJECTIVES

In the year ahead FBC UK's modern slavery strategy will be presented to the Executive Board for approval. Key areas of focus in the year to 31 August 2026 will be:

to review memberships, standards, codes

to review existing policies relating to human rights and modern slavery including Human Rights policy, Whistleblowing (Speak-Up) policy and procedure and Grievance policy

to introduce a new Recruitment policy and procedure

to introduce a new Ethics policy

to review the current supply chain risk mapping and traceability procedure

to conduct independent supplier inherent risk mapping assessment with Unseen

to introduce a new Supplier Code of Conduct and communicate it to suppliers

to conduct a supplier sustainability questionnaire

to conduct training for Modern Slavery, Whistleblowing (Speak-Up) and Grievance policies

to conduct role specific training on modern slavery for procurement, FSQ

### Approval

This statement was approved by the executive Board members of Fox's Burton's Companies (FBC) UK

Signed by

Signed by:

*Simon Browne*

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Signed by:

*Marco Serra*

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Position

CEO

Chief People & Organization Officer

Date

11 May 2026 | 10:50 AM BST 11 May 2026 | 6:52 PM BST

### References

1. Bermudez, S., Voora, V., Larrea, C. and Luna, E. (2022). Cocoa prices and sustainability SUSTAINABLE COMMODITIES MARKETPLACE SERIES Market Overview. [online] Available at: <https://www.iisd.org/system/files/2022-11/2022-global-market-report-cocoa.pdf>.
2. FAO (2023). Crops and livestock products. [online] Food and Agriculture Organization of the United Nations. Available at: <https://www.fao.org/faostat/en/#data/QCL>.
3. Walk Free. (n.d.). Downloads. [online] Available at: <https://www.walkfree.org/global-slavery-index/downloads/>.

