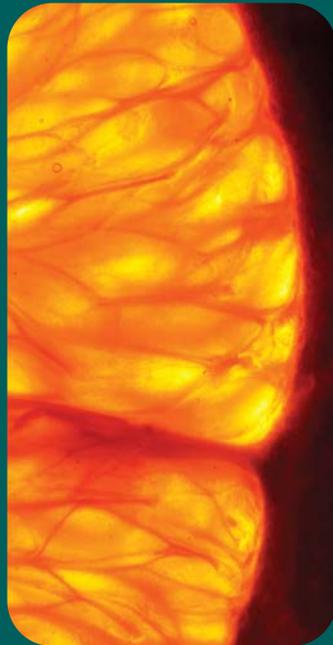


AMFRESH™

UK



Modern Slavery Statement

Tax Year 2024-2025



1. Organisational Structure and Governance

This statement is published pursuant to Section 54 of the Modern Slavery Act 2015 and covers the activities of AMFRESH Group UK Limited, comprising AMT Fresh Limited, AMFRESH UK Limited, AMK Fresh Limited and AMFRESH Food & Drink Limited.

AMFRESH Group UK Limited employs approximately 1,500 people across three sites in the United Kingdom. Our operations include two packhouses receiving and packing fresh produce, including citrus, table grapes, top fruit, tropical fruits and ambient vegetables, and one processing facility producing fruit juices and fruit-based beverages.

We recognise that modern slavery and human trafficking present potential risks within both our own operations and our global supply chains. We are therefore committed to maintaining robust systems and controls designed to mitigate these risks and to ensure compliance with applicable legislation.

The **AMFRESH Group Human Rights Policy**, which is globally approved by the Board of Directors and reviewed annually, is aligned with internationally recognised standards established by the United Nations. These include, among others, the **ILO Declaration on Fundamental Principles and Rights at Work**, the **UN Guiding Principles on Business and Human Rights**, and the **Ethical Trading Initiative Base Code**.

Within AMFRESH Group UK Limited, the UK Managing Director holds overall responsibility for addressing modern slavery and human trafficking within the organisation.

The **Group HR Director** is responsible for the development, implementation and communication of internal policies relating to ethical employment practices and worker protection. These include our **Whistleblowing Policy, Code of Conduct, Employee Handbook, Grievance Policy, Recruitment Policy, Dignity at Work Policy, and Child Labour and Young Workers and Remediation Policy**.

The **Group ESG Director** is responsible for approving supplier sustainability requirements and overseeing supply chain human rights due diligence, including the identification, assessment and monitoring of modern slavery risks.

The **Ethical Compliance Manager**, supported by a team of Ethical Compliance Officers, works directly with customers and suppliers to implement these requirements. This team is responsible for communicating ethical standards and updates to suppliers, monitoring compliance, supporting suppliers in addressing non-conformances, and driving continuous improvement in labour standards and responsible business practices.

Both the ESG function and the Ethical Compliance team represent AMFRESH in relevant industry organisations, participating in collaborative initiatives, working groups and horizon-scanning activities to strengthen industry responses to modern slavery risks.

Our own operations and supply chains

Our own Operations

AMFRESH Group UK Limited maintains a **centralised recruitment team** responsible for managing resourcing across our UK operations. Digital systems are used to support recruitment processes, monitor adherence to internal procedures and conduct appropriate pre-employment and security checks.

Our operational sites are independently audited against the **Sedex Members Ethical Trade Audit (SMETA)** standard every two years. These audits assess management systems, labour standards, health and safety, and business ethics, with particular reference to legal compliance and the principles of the Ethical Trading Initiative (ETI) Base Code.

Where seasonal labour is required, we engage a **single approved labour provider**. This provider is also subject to independent third-party ethical audits and must comply with our ethical employment standards and applicable regulatory requirements.

During the reporting period, AMFRESH received the Fresh Produce Consortium Fresh Award for 'HR Initiative of the Year' in recognition of the implementation of Workvivo by Zoom across our UK businesses. Workvivo is an employee engagement and internal communications platform designed to strengthen communication across the organisation, promote employee wellbeing and support greater connectivity between teams.

In addition, an employee engagement survey was conducted in February 2025 by an independent third-party provider across our UK operations. The survey was anonymous and available in multiple languages to ensure that all employees had the opportunity to share feedback.

Our supply chains

During the reporting year, AMFRESH sourced raw materials (fresh produce) from **29 countries**, with approximately **2,500 production sites** within our supply chain, including farms and packhouses. Of these sites, almost 80% are located in **countries classified as higher risk** according to the risk-rating methodology of the Food Network for Ethical Trade (FNET).

Raw materials are sourced based on a range of criteria, including **fruit variety, quality, price, and compliance with ethical and environmental standards**. As suppliers to major UK retailers, we are required to meet strict contractual obligations relating to responsible sourcing and supply chain transparency.

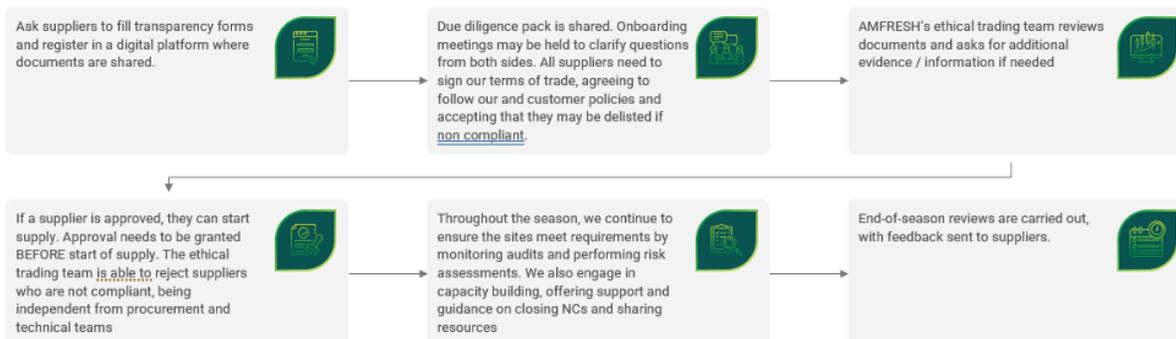
We maintain **traceability to farm level** for all raw materials, enabling us to identify the origin of products and support effective monitoring of labour standards across our supply chain. This requirement applies not only to planned supply volumes but also to **spot purchases and contingency sourcing**, ensuring that consistent ethical standards are maintained across all procurement activities.

Compliance with our ethical standards is monitored through **supplier performance metrics and key performance indicators (KPIs)**. Performance is reviewed regularly and communicated to suppliers through **annual reviews and supplier scorecards**, supporting continuous improvement and accountability across our supply chain.

2. Due diligence processes

When onboarding new suppliers or sourcing from new countries, we conduct risk assessments that include consideration of modern slavery risks and suppliers' capacity to prevent and mitigate such risks.

ENVIRONMENTAL AND HUMAN RIGHTS RISK MANAGEMENT, COMMUNICATIONS AND MONITORING: SUPPLIER ONBOARDING PROCESS



This process is followed strictly for ALL SUPPLIERS, including spot purchases. For supply from cooperatives, our approach is to request that sites have the same management system/policies in place and evaluate the performance of the cooperative group in audits. For farmers with GRASP, there's a sampling method for audits, and the same applies for SIZA.

Where heightened risks are identified, we undertake enhanced due diligence, which may include detailed policy reviews, supplier engagement, training recommendations and collaboration with local organisations.

Our Ethical Compliance team monitors a range of ethical audits and certifications across the supply chain. Where non-conformances are identified, suppliers are supported in developing corrective action plans and implementing improvements within agreed timeframes.

Supplier approval is conducted prior to the commencement of supply. Ethical Compliance Officers have authority to approve or reject suppliers based on sustainability and ethical compliance criteria. During the reporting period 2024–2025, no confirmed instances of modern slavery were identified within our operations or through supply chain due diligence processes.

Any potential allegation of modern slavery would be investigated in accordance with our Serious Incidents in the Supply Chain Policy, which includes investigation procedures and corrective actions designed to address issues and prevent recurrence.

3. Assessing and managing risks

To identify and prioritise risks within our supply chains, AMFRESH has developed a structured system over several years to assess both **current and salient human rights risks** associated with our raw material sourcing. Our approach is based on three key pillars: **supplier due diligence, risk assessment, and collaboration to prevent and address issues.**

Robust Risk Assessment Across Our Supply Base

We utilise a proprietary **Human Rights Due Diligence (HRDD) risk assessment tool** to evaluate risks across our supply base. This tool incorporates inherent country risk ratings, including those provided by the Food Network for Ethical Trade (FNET), alongside data from recognised international sources.

These include:

- ✓ **Sedex** risk insights and audit data
- ✓ The **United Nations Development Programme (UNDP) Human Development Index and Gender Inequality Index**
- ✓ The **International Trade Union Confederation (ITUC) Global Rights Index**
- ✓ The **Children's Rights and Business Atlas**
- ✓ **Freedom in the World** reports
- ✓ The **U.S. Department of State Trafficking in Persons Report**
- ✓ The **Walk Free Global Slavery Index**

In addition to external datasets, our risk assessment incorporates internal and operational intelligence, including

- ✓ Ethical audit reports and SEDEX data
- ✓ Media and NGO reports relating to labour conditions
- ✓ Information gathered by our teams during supplier visits
- ✓ Input from local resources and partners in countries of origin

Collaboration to Prevent and Address Issues

We recognise that effective management of modern slavery risks requires collaboration and continuous engagement with suppliers and industry partners. Our approach includes:

- ✓ **Capacity building with suppliers**, supporting them to address non-conformances (NCs) identified through audits and improve performance throughout the season
- ✓ **Horizon scanning**, drawing on information and guidance from professional bodies and ethical trade organisations including **ETI, Sedex, SIZA, FNET, GLAA, Stronger Together and the International Labour Organization (ILO)**, as well as reports from the **U.S. Department of State and the U.S. Department of Labor on child and forced labour risks**

AMFRESH actively participates in a number of **industry initiatives and working groups**. We are currently members of **FNET, the Spanish Ethical Trade Forum, the Egyptian Ethical Trade Forum, SIZA and the Seasonal Worker Scheme (SWS) Taskforce** (which we joined during this reporting period).

During the reporting period, our **Ethical Compliance Manager represented AMFRESH on the advisory group addressing gender-based violence and harassment (GBVH) in agricultural supply chains**, an initiative led by the **Ethical Trading Initiative (ETI)**.

Where emerging high risks of forced labour or child labour are identified, or where confirmed cases occur within the agricultural sector or the products we source, we undertake **enhanced due diligence** as appropriate. During the previous sourcing season, we introduced the **full Forced Labour Self-Assessment Questionnaire (SAQ)** across the AMFRESH UK supply chain to collect detailed information on how suppliers manage and mitigate forced labour risks.

Data collected during the due diligence process is used to monitor our KPIs such as percentage of suppliers audited in high-risk countries and percentage of NCs closed within deadlines.

We will continue to monitor potential risk indicators through the analysis of audit non-conformances, ongoing risk assessments and continued engagement and communication with our supply chain partners.

4. Training and capacity building

In our three operational sites in the UK, **Modern Slavery awareness training is provided to all workers as part of their induction**, regardless of employment status or role. The training covers the risks of labour exploitation and human trafficking, how to recognise potential indicators of modern slavery, how to raise concerns, and where workers can access support. This also includes watching a video from Stronger Together on the subject that brings the topic to life in terms of real-life scenarios.

We display Stronger Together posters, in various languages, across our noticeboards and in our welfare facilities.

In addition to the Modern Slavery training that covers 100% of our workforce, we also offer additional training from supervisor to senior management levels in multiple forms.

Through our internal communications platform, **Workvivo**, we share relevant policies, guidance and awareness materials with employees.

In 2024, during **UK Anti-Slavery Week**, we had a modern slavery awareness campaign.

Several resources in different formats were shared, including infographics with stats about modern slavery in the UK and in our supply chains, a modern slavery quiz and a video featuring a former officer from the **Gangmasters and Labour Abuse Authority (GLAA)** discussing the importance of awareness and reporting.

There is also training and awareness materials available for our suppliers in the different countries of origin. During the onboarding and due diligence processes, we engage with suppliers to share these with them, and our ethical compliance team provides technical assistance, especially for those located in high-risk countries.

We also work together with our customers, certification bodies and other institutions to encourage our suppliers to participate in webinars, field days, events and trainings, some of which include:

- ✓ Spanish Ethical Trade forum events, webinars and initiatives;
- ✓ Responsible Recruitment Training organised by Responsible Recruitment Toolkit (RRT);
- ✓ Stronger Together courses;
- ✓ Egyptian Ethical Trade Forum events and initiatives;
- ✓ FNET workstream meetings and events
- ✓ SWS Taskforce grower roadshows and initiatives

Through our digital channels to communicate with suppliers, we also share public documents when

available. One example was the Guidance Document for Decent Worker Accommodation in Morocco's Fresh Produce Supply Chains, launched by Partner Africa in May 2025 through collaboration with retailers and importers. AMFRESH was not one of the sponsors of this initiative, but we encouraged our suppliers in the region to join the webinar and consult this guidance in case they need.

5. Monitoring effectiveness and continuous improvement

In the previous reporting period, we assessed our progress using the **Stronger Together Progress Reporting Tool (PRT)**. Between July 2021 and 2024, our score improved from **30%** to **63%**, reflecting the continued development of our modern slavery risk management systems. We intend to continue using this tool to monitor our performance and identify further opportunities for improvement.

During the current reporting period, we also completed a **third-party evaluation of our Human Rights Due Diligence (HRDD) system**. The purpose of this assessment was to evaluate AMFRESH practices against **customer requirements, recognised best practice, applicable legal standards, and HRDD maturity frameworks**.

The external experts reviewed our policies and procedures, engaged with both internal and external stakeholders, and conducted a gap analysis across several key areas, including:

- ✔ **Policy and accountability** – policies, governance structures and senior leadership engagement
- ✔ **Risk assessment** – robustness of risk assessment methodologies and prioritisation of actions arising from assessments
- ✔ **Prevention and mitigation** – supplier engagement, grievance mechanisms and supplier evaluation processes
- ✔ **Monitoring and performance tracking** – supply chain monitoring systems and key performance indicators (KPIs)
- ✔ **Remedy** – protocols and investigation processes for serious incidents
- ✔ **Communication** – external reporting and stakeholder engagement

The assessment highlighted several strengths within our approach, including:

- ✔ A knowledgeable and integrity-driven ethical compliance team
- ✔ Comprehensive policy coverage with clear requirements for suppliers
- ✔ High levels of supply chain traceability
- ✔ A robust and well-managed ethical audit programme supporting compliance with internationally recognised labour standards
- ✔ Strong internal collaboration across teams, supported by tools such as supplier scorecards
- ✔ Stable, long-term and transparent relationships with suppliers
- ✔ An established grievance mechanism within our own operations
- ✔ Active participation in industry initiatives, including membership of **FNET, SIZA and ethical trade forums**

The evaluation also identified opportunities to further strengthen our approach, including expanding engagement with suppliers beyond the audit process, such as through supplier site visits and participation in local initiatives.

Based on this feedback and the improvement opportunities identified, over the next 12 months we will focus on the following priorities:

- ✓ Updating our **risk assessment methodology and associated KPIs**
- ✓ Continuing to ensure compliance with **ethical audit requirements across our supply base**
- ✓ Exploring opportunities for **collaboration with local initiatives in key sourcing countries**
- ✓ Promoting greater awareness and training on modern slavery within our own operations and across our supply chains
- ✓ Strengthening the **sharing of risks, insights and performance data with internal and external stakeholders**
- ✓ Identifying additional sources of information relating to supplier performance and engaging wider internal teams in identifying risks beyond audit findings

AMFRESH Group UK remains committed to strengthening our systems to identify, prevent and address modern slavery risks across our operations and supply chains. We recognise that this is an ongoing process and will continue to work collaboratively with employees, suppliers, customers and industry partners to promote responsible labour practices.

This statement has been approved by the Board of Directors of AMFRESH Group UK Limited and is signed on its behalf by:

Name: Ian Wood

Position: UK Managing Director



11/3/2026