



MODERN SLAVERY COMPLIANCE STATEMENT BAXTERS FOOD GROUP APRIL 2024 – MARCH 2025

This statement is made on behalf of W. A. Baxter & Sons (Holdings) Limited and its group companies pursuant to section 54(1) of the UK Modern Slavery Act 2015, and sets out the steps taken to mitigate the risk of modern slavery occurring within our operations and supply chain.

INTRODUCTION

As a family-owned business, Baxters Food Group has over 150 years of doing business in a responsible way which has been reflected in our “*Be Different, Be Better*” ethos, established by George Baxter in 1868. We take our responsibilities under the Modern Slavery Act seriously; it is the responsibility of everyone to be alert to and vigilant in identifying both the risks and signs of modern slavery. We demonstrate our commitment to tackling modern slavery through our five values:

Be Collaborative, Be Brilliant, Be Accountable Be Responsible, Be Respectful.

Baxters is a caring family business, driven by a passion for great quality food and a desire to nurture our brands, people and partners. Baxters remains committed to continually improving our awareness and practices. Where occurrences are identified, Baxters will report the matter to the GLAA (Gang Master and Labour Abuse Authority) or Police in the UK and with the appropriate authorities within our supply chains internationally.

ORGANISATION'S STRUCTURE & SUPPLY CHAINS

Baxters Food Group (Baxters) is a manufacturer of fine quality food products including soups, preserves, condiments and chutneys. The Group has circa 1800 employees worldwide with operations in the UK, USA, Australia and Poland. Baxters' ultimate parent company is W.A. Baxter & Sons (Holdings) Limited.

Baxters is headquartered in Edinburgh, Scotland and has five operating sites in Europe; at Fochabers in Scotland, Colchester, Burntwood and London in England, and Wolsztyn in Poland, as well as businesses in the USA and Australia.

Baxters works with a large number of suppliers internationally, supplying products and services in the following categories:

- raw materials and part processed products for the production of food;
- packaging;
- transportation of goods; and
- contracted services



OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking activity in our supply chains or in any part of our business. These policies include:

- Employee Code of Conduct
- Ethical Trade Policy
- Human Rights Policy
- Modern Slavery Policy
- Preventing Hidden Labour Exploitation Policy

We continue to review and update our practices, policies and procedures to establish the best way of communicating and managing modern slavery compliance.

Our policies reflect our commitment to acting ethically and with integrity in all of our business relationships. Our products should be sourced ethically and responsibly, and we aim to contribute positively to those who help us manufacture them. We recognise that slavery exists worldwide and we will actively assist in the combat against modern slavery.

DUE DILIGENCE PROCESSES

Baxters Food Group is an A/B member of the Supplier Ethical Data Exchange (Sedex). All of our European production sites have undertaken Sedex Members Ethical Trade Audits (SMETA). These audits are designed to assess a site based on their organisation's standards of labour, health and safety, environment and business ethics. Any non-conformances highlighted by SMETA have been acted upon promptly.

Employee consultative committees are established at all of our UK production sites to provide our staff with an open and supportive forum to raise issues and provide feedback on working conditions. Our Whistleblowing Policy and hotline system enables staff to report any concerns, including modern slavery and any other human rights violations, securely and without fear of recrimination.

Our standard terms and conditions of supply for our European business include an obligation to: 1) join Sedex and 2) link with Baxters on Sedex to provide us with access to suppliers' self-assessment questionnaires (SAQs) and audit information.

Baxters' expectations and requirements of those in our supply chain are made clear from our Ethical Trade and Modern Slavery Policies, compliance with which form a contractual obligation of the standard terms and conditions of supply.



RISK ASSESSMENT & MANAGEMENT

Our ingredient and packaging supplier onboarding process includes verification of Sedex linking and audits are regularly undertaken with new and existing suppliers.

Improving standards in the supply chain is an ongoing process. We are continuing to investigate and consider ways to enhance our ethical audit programme and further strengthen our risk assessment, management and due diligence processes for modern slavery, within our business and in partnership with others. We are committed to making progress in this area and continuous improvement is discussed at our Group Risk Committee.

MEASURING EFFECTIVENESS

Since FY24 we have used key performance indicators (KPIs) to help measure our effectiveness in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. Our progress against those KPIs is noted below.

KPI	Why these metrics are important	FY25 Progress
Zero modern slavery incidents reported in our organisation	Allows us to track incidents that occur and quantify the effectiveness of our reporting, due diligence and feedback mechanisms.	Met
100% of UK colleagues completed a form of induction or refresher Modern Slavery Training in the past three-year period	Allows us to track and drive progress on raising awareness and understanding of modern slavery risk across the business.	Not Met
Min. 85% of our suppliers* linked with Baxters on Sedex	Provides us with better understanding of our supply chain and a greater ability to identify and address modern slavery risk.	Met
Min. 95% of our Sedex-linked suppliers have completed their SAQ to 100%		_**

*raw ingredients and packaging

**the conversion to new SAQ standards coincided with the reporting period which has impacted our ability to accurately report against this KPI

We intend to report against the same KPIs next year.



TRAINING & AWARENESS

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. Mandatory Modern Slavery training is provided to all new starters and staff are required to complete refresher training every three years. Unfortunately, we did not meet the 100% target we set for training completion this year. We have been undertaking a project to completely digitise our training records and this has impacted our ability to accurately report against the KPI set. We are confident that the upgrades we have made/ are making to our learning management systems will enhance our progress in this area during the next financial year.

Various channels of communication are used across our European sites to make staff aware of Modern Slavery and what flags to look out for to alert them to possible victims of abuse. We continue to use Stronger Together videos in our induction training and display Stronger Together posters prominently across our UK sites.

This statement reflects the trading period April 2024 to March 2025. It has been approved by our Board of Directors and is signed by our Group HR & Communications Director, Anton Zawada.

A handwritten signature in black ink, appearing to read "A. Zawada", is positioned to the right of the text block.