



## **Modern Slavery Statement**

Financial year ending September 2025

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps Moulton Bulb Company Ltd has taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains.

### **1. Organisation's structure, business and supply chains**

Moulton Bulb Company Ltd is a UK-based fresh produce business operating within the supermarket and wholesale market sectors, specialising in onions, garlic and related allium products.

Moulton Bulb Company Ltd is part of the Oldershaw Group, The Group employs approximately 340 employees within Moulton Bulb Company Ltd and approximately 360 individuals across the wider Group. The Group operates in the UK, with a global annual turnover in excess of £80 million.

Our supply chains include UK and overseas growers and producers. We source onions and garlic from growers and producers in countries including Spain, Chile, New Zealand, Egypt, Argentina, the Netherlands and China, alongside UK operations.

### **2. Policies relating to modern slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **3. Due diligence processes**

As part of our initiative to identify and mitigate risk we undertake due diligence on our supplier companies and customers.

1. In the produce we grow and the processing we undertake in the UK we only use our own direct employees (and undertake all checks required under current legislation) or agency workers supplied by agencies authorised by the Gangmasters Licensing Authority.
2. We train all of our staff on the importance of the issue and actively encourage them to report any concerns that they have from whatever source.
3. With our overseas suppliers we trade only with businesses who are prepared to confirm that they will abide by our anti-slavery policy (or who have an equivalent policy of their own).

In those overseas suppliers where they have an equivalent to the Gangmasters Licensing Authority we insist that any agency staff supplied are supplied by a duly authorised business.

#### **4. Risk assessment and risk management**

We recognise that risks of modern slavery may be higher in agricultural supply chains, the use of agency labour, overseas sourcing from certain geographical areas, and situations involving migrant, seasonal or temporary workers. Risks are assessed through supplier engagement, labour provider audits, site visits and ongoing monitoring. Where risks or issues are identified, corrective actions are agreed with clear timescales and followed up proportionately.

#### **5. Effectiveness and performance indicators**

We assess the effectiveness of our approach through labour provider audit outcomes, supplier audit and certification status, SEDEX SAQ completion and review, issues raised through grievance or whistleblowing mechanisms, completion of training, senior management and Board review, and a Human Rights Due Diligence review.

#### **6. Training and awareness**

Modern slavery awareness is embedded within our training approach. This includes awareness as part of employee induction, supervisor-level training using Stronger Together resources, and ongoing awareness and refresher activity as appropriate.

#### **7. Collaboration and external engagement**

We are members of recognised external organisations and initiatives that inform and strengthen our approach to preventing modern slavery and supporting responsible recruitment. These include the Food Network for Ethical Trade, the Association of Labour Providers and Stronger Together.

## 8. Approval and sign-off

This statement was approved by the Board of Directors of Moulton Bulb Company Ltd.

Signed:



Lucy Oldershaw, Head of HR

For and on behalf of Moulton Bulb Company Ltd

Date: 15 December 2025

Endorsed by:



Robert Oldershaw, Director

For and on behalf of Moulton Bulb Company Ltd

Date: 15 December 2025