

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

K.T.C. Food Group

PURPOSE

This Anti-Slavery and Human Trafficking Statement (the **Statement**) is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) and is published on behalf of K.T.C. (Edibles) Limited and its subsidiaries (**KTC Food Group**) having a consolidated turnover in excess of £36 million. References in this Statement to “we”, “us” or “our” are to the KTC Food Group.

This is our Statement for the current financial year ended 31 December 2024 and sets out the key steps we have taken to ensure that slavery and human trafficking do not occur in our supply chains or any part of our business.

OUR BUSINESS

Organisation Structure

The KTC Food Group supplies over 300 million litres a year of high-quality cooking oils to all sectors of the food industry. The KTC Food Group is also known for its broad range of world food products, sourced from around the globe and distributed to manufacturers, retailers and wholesalers in the UK and worldwide.

The KTC Food Group operates from custom-built sites in Wednesbury, Liverpool, Glasgow and Walsall and an office site located in Southern Ireland. The KTC Food Group implements strict supplier approval and quality control systems, operating to the highest possible standards in safety, hygiene and quality.

Our Supply Chains

We are committed to improving our practices to prevent modern slavery and human trafficking in our supply chain. We ensure that we only engage with suppliers who share our values.

We have launched a new supplier code of conduct which outlines our expectation for all our suppliers to act ethically and with integrity at all times. All our raw material and packaging suppliers must either agree to comply with our code of conduct or provide us with a copy of their own company code of conduct which commits them to preventing modern slavery and human trafficking in their supply chains. If we are unable to obtain a code of conduct from a supplier, the Head of Procurement will review policies they have and if we are not able to gain comfort around their Modern slavery controls and practices we will remove them from our supplier list

We are not aware of any incidents of modern slavery within our supply chains or any part of our business to date.

POLICIES, PROCEDURES AND COMPLIANCE

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continually review and update our policies.

Our modern slavery policy reflects our dedication to acting ethically and ensuring we have controls in place to prevent modern slavery or human trafficking within our business or supply chains.

We also have the following policies in place relevant to modern slavery, which we continually review:

- Child Labour Policy;
- Safeguarding Young Workers Policy;
- Human Rights Policy;
- Sanctions Policy Statement;
- Supplier Code of Conduct; and
- Whistleblowing Policy.

We make sure all our employees are made aware of our policies.

We are committed to providing a safe, fair and respectful working environment for all our employees. Our internal practices are designed to prevent any form of modern slavery or exploitation. We ensure that:

- **All employment is freely chosen** – We do not tolerate forced, bonded or involuntary labour. Every employee has the right to leave their employment freely and without penalty, in accordance with their contract and local laws.
- **Fair recruitment practices** – We conduct thorough background checks on recruitment agencies and ensure that no fees are charged to workers. Our hiring processes are transparent, and all employees are provided with clear, written terms of employment.
- **Wages and working hours** – We comply with all relevant working hours and pay legislation. Employees are paid above the legal minimum wage and receive all legally mandated benefits, including overtime compensation and rest periods.
- **Safe working conditions** – We provide a safe and healthy work environment, in compliance with all applicable health and safety regulations. Employees receive regular training and are encouraged to report unsafe conditions without fear of retaliation.
- **Freedom of movement and association** – We respect the rights of employees to associate freely, join trade unions and collectively bargain in accordance with local laws.
- **Reporting and grievance mechanisms** – We have confidential and accessible channels for reporting concerns related to unethical practices, including modern slavery. All reports are investigated thoroughly, and appropriate action is taken.
- **Modern slavery training** – We provide training which is conducted by a third-party specialist and was attended by all line managers and HR personnel in October 2024.

DUE DILIGENCE, RISK ASSESSMENT AND MANAGEMENT

We have appropriate systems in place to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistleblowers.

Performance Indicator

% of raw material & packaging suppliers who have supplied adequate code of conduct forms 86%

Further actions

. By the end of financial year 2025, we intend to:

- Target 100% of our raw material and packaging suppliers are signed up and in agreement to comply with our supplier code of conduct or otherwise have their own appropriate code of conduct in place. Non-compliant suppliers may be removed from our approved supplier list.
- We will continue to review our supply chains to monitor and identify current and emerging risks. By 2026, we aim to have robust processes and practices in place to conduct on-site audits of all high-risk suppliers. Where breaches are identified, appropriate corrective actions will be taken.
- Continue awareness training and provide modern slavery refresher training for all managers.

BOARD APPROVAL

This Statement for the current financial year and has been approved by the Board of Directors for the KTC Food Group.



Paresh Mehta
Chief Executive Officer
KTC Food Group

Date: 29/09/2025