

The Greencore logo is positioned in the top right corner. It features the word "Greencore" in a white, sans-serif font, with a small green leaf icon to its right. The background of the entire page is a photograph of a woman in a blue hairnet and white lab coat working in a factory setting with green lighting.

Greencore

Modern Slavery and Human Trafficking Transparency Statement

Making every day taste

better

For the financial year ended 29 September 2023

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1. Introduction

Human rights abuse is an area of growing concern – not just in global supply chains, but within UK food manufacturing operations. Greencore Group plc and each of its subsidiaries ('Greencore' or 'the Group') is committed to respecting and safeguarding the people who work for us, with us, or who are affected by our activities. We are committed to playing our part in addressing modern slavery and we firmly advocate for transparency and collaboration to eliminate this kind of activity.

In last year's Modern Slavery and Human Trafficking Transparency Statement, we committed to playing our part in tackling modern slavery. We have met this commitment and continue to focus on human rights and the struggle against modern slavery and labour exploitation. We are determined to be transparent about the challenges that we face and know that we can only disrupt these abhorrent crimes by working in partnership with other organisations in the food industry and our stakeholders, colleagues and suppliers.

Greencore Group plc and each of its subsidiaries is committed to respecting and safeguarding the people who work for us, with us, or are affected by our activities. We choose to act as advocates for change, in the hope that the crime of modern slavery can be eliminated wherever it is encountered.

Greencore falls within the reporting scope of the UK Modern Slavery Act 2015 ('the Act') and this statement for our financial year ending 29 September 2023 ('FY23') describes the actions we have taken to ensure that modern

slavery is not taking place in our operations and supply chains.

This statement is made in accordance with Section 54, Part 6 of the Act. It details each Greencore entity to which Section 54, Part 6, applies and the steps taken during the reporting period to ensure that slavery and human trafficking are not taking place within Greencore or Greencore's supply chain. The Greencore entities to which the Modern Slavery and Human Trafficking Transparency Statement for FY23 applies are:

- Greencore Food to Go Limited
- Greencore Grocery Limited
- Greencore Prepared Meals Limited

This statement, which will continue to be subject to annual review, has been reviewed by senior management and has been reviewed and approved by the Board of Directors of each of the entities covered under the Act.

Signed:



Dalton Philips
Group Chief Executive Officer



Guy Dullage
Group Chief People Officer
and Director of:

Greencore Food to Go Limited
Greencore Grocery Limited
Greencore Prepared Meals Limited

Date of approval: 25 January 2024



2. Our Business

What we do

We are a leading manufacturer of convenience foods in the UK and our purpose is to make every day taste better. We supply all of the major supermarkets in the UK. We also supply convenience and travel retail outlets, discounters, coffee shops, food service and other retailers. We have strong market positions in a range of categories including sandwiches, salads, sushi, chilled snacking, chilled ready meals, chilled soups and sauces, chilled quiche, ambient sauces and pickles, and frozen Yorkshire Puddings.

We employ approximately 13,600 colleagues across our operations, which consist of 16 manufacturing sites, 3 regional distribution centres and 14 transport hubs.

We work in alignment with our corporate purpose 'Making every day taste better' and our sustainability ambition 'Better Future Plan', which specifically includes the protection of human rights.

More information on our business can be found in our latest Annual Report and Financial Statements, and our latest Sustainability Report, all of which can be accessed at www.greencore.com.

Our purpose

Our purpose, 'Making every day taste better' defines and inspires us. People are the single most important element of our organisation. By sharing and reflecting what makes us different - People at the Core, Great Food, Excellence, and Sustainability - our people will help us bring our purpose to life.

Our work to combat modern slavery and human trafficking is a key way that we choose to protect our people, both colleagues within Greencore and those who work in our supply chains. In turn, this work is part of our wider corporate purpose and features as a key component of our sustainability strategy.

Our corporate purpose provides a broad framework for this and together with our sustainability strategy, which includes human rights, it gives a clear direction for the business.

For us, purpose, people and sustainability are interconnected.

Our supply chain

We have publicly stated our aspiration to source our priority ingredients from a sustainable and fair supply chain by 2030. We know that this will require improvements in transparency throughout our global supply chains and we acknowledge the potential for modern slavery and human trafficking within these supply chains. We use a range of approaches and tools to address these risks and describe them in this report.

Greencore is a food manufacturing business. The food that we make and sell is made using ingredients sourced from approximately 300 suppliers around the world, although the majority of these suppliers are UK-based businesses. We work to build effective, fair and transparent supply chains and value long-term relationships with suppliers that help us achieve this.



3. Our Policies and Governance

3.1 Policies

Greencore are committed to honesty and integrity in the conduct of our business. The **Greencore Code of Ethics and Business Conduct** defines and describes the principles we rely on to carry out our activities, and is publicly available at www.greencore.com.

We are transparent about the standards that we work to and publish our commitments in the **Greencore Human Rights Policy**, which is also at www.greencore.com.

Greencore acknowledge that the ways in which we conduct business and manage our company affairs has the potential to impact our stakeholders directly and they have the right to expect high standards throughout.

We have maintained our commitment as a Group to implement the principles of the Ethical Trading Initiative Base Code, an internationally recognised code of labour practice.

3.2 Governance

We revisit our governance approach every year, making sure we have the right voices around the right tables at the appropriate frequency.

- The Chief Executive Officer ('CEO') has responsibility for overall performance of the Group, which includes sustainability governance. Our Chief Operating Officer ('COO'), has executive accountability for the overall Sustainability Strategy, ensuring its day-to-day momentum, buy in and progress. Our Chief People Officer ('CPO') has accountability for our Ethics and Modern Slavery plan.
- This year we have enhanced Board focus on the agenda by establishing a formal sub-committee of the Board, namely the Sustainability Committee. The Sustainability Committee meets twice a year to review programme performance and ensure the agenda has the support to progress

at the pace required.

- We also refreshed our Sustainability Steering Committee, now known as the Sustainability Oversight Committee ('SOC'). This is comprised of leaders from key functions within the Group (such as Finance, Risk, Legal and Company Secretarial, Commercial and Technical). The SOC's purpose is to act as a cross-functional business advisory group to support the Head of Sustainability in the delivery of our Better Future Plan.
- At an operational and topic-specific level, we have six Sustainable Business Management Groups ('SBMGs'), chaired by senior leaders, that provide a cross functional forum to develop and steer our strategy at an operational level. Of the six SBMGs, the Ethics and Responsible Sourcing SBMGs focus

on Human Rights matters in our business and supply chains, including issues around Modern Slavery and other Labour Exploitation.

- The major step change in our governance model, however, has been the introduction of the Plan Ownership Model, designed to drive the embedding of sustainability throughout the business via dedicated Plan Owners. These include a Plan Owner focusing on Ethics and Modern Slavery in our own manufacturing sites, and a Plan Owner focusing on Human Rights challenges in our supply chains.



3.3 Employment standards

The Greencore Human Rights Policy, available at www.greencore.com, is informed by the International Labour Organisation ('ILO') Declaration on Fundamental Principles and Rights at Work. Greencore is aligned to the principles of the Ethical Trading Initiative (ETI) Base Code:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

In order to support these standards, Greencore is an AB (Buyer/Supplier) member of the Supplier Ethical Data Exchange ('SEDEX'). Each manufacturing facility is registered with SEDEX and has completed a self-assessment questionnaire.

All manufacturing sites have regular independent ethical audits conducted by an external accredited audit company.

Agency and other labour

Agency colleagues perform an important role in a fast-paced food manufacturing business, however we recognise that due to the nature of agency work there is a vulnerability among the workforce to exploitation. Therefore our employment standards are equally applied to employment agencies with whom we contract to supply temporary workers. These agencies must demonstrate a commitment to, and compliance with, the Greencore Human Rights Policy. In addition, we audit and monitor their compliance on a regular basis.

During FY23, we have increased our scope to include other providers of people services to our business, for example third party catering and security providers who provide colleagues to our sites. These suppliers undergo regular audits to ensure that the colleagues they provide to us are receiving the same protections as our direct and agency colleagues.

Direct to Store (DTS)

In last year's modern slavery statement we committed to increasing the human rights support that we provide to our DTS logistics function. We have progressed this during FY23 with an internal assessment and scoping exercise at our largest facility. This facility will undergo an independent third party ethical audit in FY24, which will inform our approach to the rest of the DTS function.



4. Assessing and Managing Risk

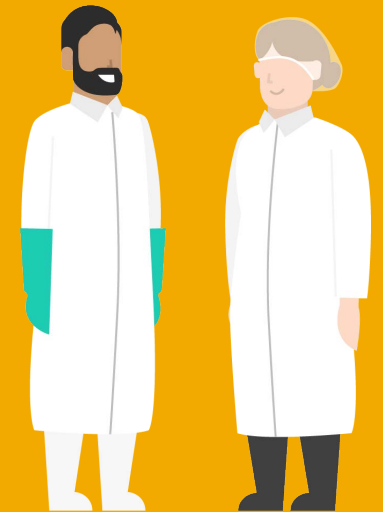
4.1 Risk assessment processes

During FY23, we have continued to apply the risk assessment approach to our supply chains that we have built over a number of years with our suppliers, customers and stakeholders. Our supply chains are complex, large, and international and we are mindful that there may be the risk of modern slavery or human trafficking within supply chains.

We completed a risk assessment of our ingredient supply chain using the Food

Network for Ethical Trade Human Rights Risk Assessment Tool. The tool is maintained by a collaborative group of retailers, suppliers and human rights experts. It uses data from sources including the U.S. Department of Labour, the Walk Free Foundation, and the International Trade Union Confederation, to establish the human rights risk of ingredients based on their country of origin and known challenges within the product sector.

We also use data from SEDEX and individual suppliers, along with industry insights and horizon scanning, to ensure the most accurate picture of the risk profile is presented. The purpose of the risk assessment is to identify those supply chains with the greatest risks and thus steer our ongoing engagement plans where we can bring the most benefit and demonstrate effectiveness.



4.2 Our priority supply chain risks

The broad assessment process identifies 10 areas for priority focus from a human rights perspective:

- Fresh produce
- Frozen produce
- Chicken
- Warm-water prawns
- Processed tomatoes
- Soya
- Tuna
- Palm oil
- Herbs & spices
- Rice

These category priority areas are then informed by detailed product level

analysis which steers the engagement decisions that we make with our suppliers and help us select the facilities and companies which require the most active support. The engagement programme is supported by our Human Rights plan owner and actions are reported to the Responsible Sourcing SBMG.

Trilby Trading Ltd

Within our Modern Slavery and Human Trafficking Statement for FY22, we described the steps we had taken to expand the scope of our due diligence activities to include our subsidiary edible

oils trading business, Trilby Trading Ltd. While this business, which is in the Republic of Ireland, is not within the scope of the act, we remain committed to ongoing transparency on human rights risks.

This work identified palm oil supply chains in territories that are considered high risk for human rights challenges. During FY23 we continued to work with Trilby's suppliers to understand ways to address these challenges.

At the end of FY23, Greencore

announced the sale of Trilby Trading Ltd which, given our strategic focus on the UK convenience food market, was no longer a core part of Greencore's plans.

Direct to Store (DTS)

Our DTS network distributes a number of Third Party Factored Goods to our customers. These goods have not historically formed part of our supply chain risk assessment and in FY24 we will conduct a scoping exercise to help us to better understand any human rights risks that may present.

4.3 Managing and mitigating risk

External reporting: “Whistleblowing”

Greencore continues to provide an independent, external reporting hotline, which is free, anonymous and confidential, whereby any individual in Greencore, or indeed any third party, can raise concerns in relation to employment standards, ethics or any other impropriety or area of concern. The contact details for the hotline are displayed in prominent areas throughout all of Greencore’s sites and on the Greencore intranet and extranet.

The nature of the calls received by the external reporting hotline are monitored and concerns are investigated, where appropriate and reported upon to the Audit and Risk Committee of the Board on a regular basis.

Stronger Together

Greencore supports the “Stronger Together” campaign, which is a multi-stakeholder initiative aimed at reducing modern slavery. We are committed to building knowledge within our teams and members of many Greencore teams and functions in the UK have attended Stronger Together training

sessions. We want to increase our understanding of the nature of hidden labour exploitation and also prevent its occurrence within our Group. The resources provided by the Stronger Together campaign, including multilingual posters and leaflets, are available throughout our Greencore sites.

Supplier Management

Greencore works with suppliers to build effective and transparent supply chains. We are reliant on our suppliers for the ingredients and services we use to create great food. We have a rigorous supplier approval process, operated by Purchasing and Technical functions, with input from the Human Rights team.

During FY23, we launched two new cornerstone documents to support our supplier management processes – a Supplier Code of Conduct and a Human Rights Policy. In addition, the Greencore Standard Terms and Conditions of Purchase contain a number of specific provisions surrounding our expectations of suppliers in the context of the prevention of slavery and human trafficking.

Specifically, suppliers are under an obligation:

- (i) not to engage in practices that amount to slavery, servitude, forced labour or human trafficking
- (ii) to comply with applicable slavery laws; and
- (iii) to provide information to enable Greencore to include meaningful information in its Slavery and Human Trafficking Transparency Statement.

We require all tier 1 ingredient and packaging suppliers to be connected to Greencore on SEDEX and we continue to bring suppliers at tier 2 and beyond into the scheme; progressively building SEDEX membership across our supply base.

Action in high risk supply chains:

During FY23, Greencore have been actively involved in the mitigation of risks in our supply chains, identified by our risk assessment process or other means. This work has included:

- Continued embargo of products sourced from Xinjiang, due to the risks of forced labour in the region and increased due diligence around products sourced from other areas of China due to the potential for



Action in high risk supply chains (cont'd)

forced labour through labour transfer programmes.

- Ongoing work with poultry suppliers in the UK identified as high risk, to improve worker standards.
- Work with fresh produce suppliers in the UK to address labour practices, especially within those suppliers using the Seasonal Worker visa scheme.
- Continued active engagement with our poultry supply chains from Thailand. This included factory visits by Greencore's Human Rights Team in November 2022.

We continue to consider agency labour as a part of our business operation which may have a risk of slavery and human trafficking occurring. We therefore prioritise audits of agency labour providers, carried out by our Technical and local HR teams and conducted on a rolling basis through the year. We also continue to conduct deep-dive human rights due diligence on potential new agency labour providers prior to entering contractual relationships.

The approval process for new labour providers is multi-staged and includes a comprehensive background check by our Human Rights team and a detailed audit by our Technical Supplier Approval team, which contains specific requirements around the prevention of modern slavery or other labour exploitation.

Collaboration is key in disrupting exploitation and the agencies used by Greencore work closely with us to share best practice for worker welfare and approaches for addressing modern slavery or labour exploitation risks.



5. Training and Capacity Building

Greencore supports the Stronger Together campaign and each manufacturing site is expected to maintain the Stronger Together Business Partner commitment. Colleagues from our sites receive training in relation to this initiative, in addition to training in a number of areas related to ethical standards within our operations.

HR and Talent Acquisition teams in Greencore are provided with the knowledge and resources required to conduct checks on "Right to Work" compliance. HR colleagues also maintain competency in management of the SEDEX system, managing and leading ethical audits and closing out non-conformances.

We continue to evolve our processes around eligibility to work and identity, and have strengthened our approach to reduce the potential risk of imposter switching when onboarding new colleagues.

Training on hidden labour exploitation is included in our induction that is delivered to every new starter, and a training package on ethical standards is provided to colleagues as part of our management training resources.



6. Collaboration

In an environment where the challenges are complex and often hidden, and exploiters continually evolve their methods and tactics, collaboration is key to driving improvements in the fight against Modern Slavery.

Greencore continues to work with other businesses and stakeholders and maintains links with the Gangmasters and Labour Abuse Authority ('GLAA'), relevant Police teams, the Association of Labour Providers ('ALP') and Stronger Together.

Some specific collaborative programmes we are involved with include:

Food Network for Ethical Trade

Greencore is a member of the Food Network for Ethical Trade ('FNET'). FNET is an initiative aiming to use the collective leverage of suppliers and retailers to bring about positive change in global food supply chains working conditions by providing guidance, resources, training and opportunities for collaboration. Greencore's Head of Human Rights was a member of the Board during FY23.

Our active membership of FNET enables us to collaborate with industry experts to drive best practice and keep up to date with the challenges in this fast-changing environment.

Greencore continue to be involved in a number of working groups within the network.

Modern Slavery Intelligence Network

The Modern Slavery Intelligence Network ('MSIN') is a pioneering non-profit collaboration in the UK food and agriculture sector, created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation. The MSIN is fundamentally a platform for sharing modern slavery data safely and appropriately with wide-ranging stakeholders.

The MSIN members are working together to ensure, so far as possible, that robust mechanisms are in place to safeguard those who may be impacted by modern slavery and/or worker exploitation and their data. This has required a significant commitment from all members involved and engagement with several internal functions within the members' organisations including

human rights, ethical trading, legal, data protection, privacy and IT security.

Greencore have continued to deploy significant resources and skills to support the initiative throughout FY23 and will continue to do so through the duration of MSIN. We see such collaborative programmes as the main avenue available to us to actively disrupt Modern Slavery and exploitation.

Issara Institute

Issara Institute is an independent NGO based in Asia and the United States, tackling issues of human trafficking and forced labour through worker voice, partnership, and innovation.

Greencore became a Strategic Partner during FY23 which gives us access to on the ground worker voice information in regions where some of our high-risk ingredient supply chains operate.

Seafood Ethics Action Alliance

The Seafood Ethics Action Alliance (SEA Alliance) is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the

global seafood supply chain, and ensure respect for human rights.

Greencore joined in FY23 with the aim of gaining greater understanding of the human rights challenges in the global seafood sector, which is one of our high-risk ingredient sectors.

Bright Future

We are proud to be a business partner of the Bright Future Co-operative, which aims to fast-track survivors of modern slavery into high quality employment.



Bright Future (cont'd)

This initiative removes some of the barriers facing survivors when they are ready to rejoin the workforce by providing paid placements and supporting candidates through their employment journey.

Ingredients 4 Life

For several years we have worked alongside charity organisations City Hearts and The Snowdrop Project and a retail partner to develop a unique initiative to help survivors of modern slavery to learn new culinary skills and to also help them to regain their trust in people. This continued in FY23 with in-person sessions at a Greencore site with our chefs.

We have received heartwarming feedback from the participants, both Greencore colleagues and survivors of modern slavery and remain committed to supporting the programme.

We will continue to be innovative in our approach to tackle the issue of modern slavery as well as assisting survivors of modern slavery.



7. Tracking Our Progress

We cannot tackle labour exploitation, modern slavery and human trafficking without being transparent about the challenges that we encounter. We also want to share areas of progress and improvement. This applies to both our own activities as an employer and food manufacturer and to the activities of our suppliers.

As in previous years, we continued to focus on collaborative projects, as described in section 6, alongside detailed supply chain risk analysis and transparency. We track progress through a number of metrics and believe that they help demonstrate the effectiveness of our actions to ensure that slavery and human trafficking is not taking place in our business. The objectives measured against each KPI are set out below.

Commitments

Our ongoing commitments are below:



We will report on our actions - our successes and failures - in a simple and transparent way each year.



Our successful cross-disciplinary approach, that engages colleagues in Technical, HR, Operations and Purchasing functions will be further supported and developed.



We will increase focus on supply chains, understanding the realities of complex multi-tier and multinational supply from an ethical perspective.



We will play a leading role in collaborative programmes that tackle wider ethical challenges as well as specific Modern Slavery risks.



We will build partnerships with external experts, academia and non-governmental organisations to inform our ethical practices and help address modern slavery, human trafficking, worker abuse and exploitation.



We will continue to support the survivors of modern slavery and human trafficking.

Plans for FY24

- Undergo pilot SMETA audit at our largest logistics facility and use the learnings to shape our approach to enhanced human rights due diligence across our entire logistics function.
- Progress our engagement programme with suppliers of high risk ingredients, informed by our risk assessment and supported by our Human Rights plan owner.
- Increase our understanding of risk within the supply chains of the Third Party Factored Goods distributed by our logistics network



Key Performance Indicators

Throughout this statement, we reference KPIs as our way of demonstrating transparency and the drive for improvement. We believe that these KPIs are the most appropriate measures of our activity.

Area	Objective	Target end Sept 2023	Achieved end Sept 2023	Commentary
Independent Ethical Audit	All sites have an up to date ethical audit	100%	100%	
	All sites have closed out any non-conformances from ethical audits within agreed timescales	100%	88%	Due to the complexity of some findings, it has been necessary to engage with external stakeholders to address these non-conformances. This has caused findings to remain outstanding beyond the suggested close out times given in the audits for two of our sites. One of the issues has now been addressed and corrective actions implemented (15 January 2024). Progress on the second issue is ongoing and we expect this to be closed out during H1 FY24.
Stronger Together	All sites are Stronger Together Business Partners	100%	94%	15 of 16 sites completed their Business Partner registration during the reporting period, the other site completed theirs shortly after and so all registrations are now complete as at the date of approval of this statement.
Supplier SEDEX Registration	Raw material and packaging suppliers are SEDEX registered	99%	99%	

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