

Modern Slavery and Human Trafficking Transparency Statement

Greencore Group plc
For the financial year ended 26 September 2025

Greencore 

2025



Contents

01.	Introduction	02
02.	Our Business	03
2.1	What we do	03
2.2	Our supply chain	03
03.	Our Policies and Governance	04
3.1	Policies	04
3.2	Governance	04
3.3	Employment Standards	05
04.	Assessing and Managing Risk	06
4.1	Managing Risk in our Own Operations	06
4.2	Managing Risk in our Supply Chain	07
05.	Training and Capacity Building	08
5.1	Training for colleagues working in our direct operations	08
5.2	Training for colleagues working with our global supply chains	09
5.3	Awareness raising	09
06.	Collaboration	10
07.	Tracking Our Progress	11



01. Introduction

Greencore Group plc and each of its subsidiaries ('Greencore' or 'the Group') is committed to promoting ethical conduct, safeguarding worker well-being and rights, and effectively managing risks associated with labour practices and modern slavery in both our own operations and our global supply chain.

We recognise that Modern Slavery is prevalent both in the UK¹ where we operate, and around the world² where many of our raw materials originate from. We are determined to play our part in addressing modern slavery and recognise the importance of transparency and collaboration in tackling this challenge.

Greencore falls within the reporting scope of the UK Modern Slavery Act 2015 ('the Act').

This statement, for our financial year ending 26 September 2025 ('FY25') 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 modern 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 FY25 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: 29th October 2025

1 <https://www.walkfree.org/global-slavery-index/country-studies/united-kingdom/>

2 <https://www.walkfree.org/global-slavery-index/findings/global-findings/>

02. Our Business

2.1 What we do

We are a leading manufacturer and distributor of convenience foods in the UK, supplying 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 13,300 colleagues across our operations, which consist of 16 manufacturing sites, 3 regional distribution centres and 14 transport hubs.

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

2.2 Our Supply Chain

We are a food manufacturing business. The food that we manufacture and sell is made using ingredients sourced directly from approximately 300 tier 1 suppliers mostly based in the UK, however beyond tier 1 our supply chain extends around the world.

We work to build effective, fair and transparent supply chains and value long-term relationships with suppliers, which enable us to work collaboratively with them to drive meaningful change.

We recognise the importance of transparency in our global supply chains, and we acknowledge that as transparency increases, so does the potential for detecting modern slavery and other human rights concerns. We use a range of approaches and tools to address these risks and describe them in this report.



03. Our Policies and Governance

3.1 Policies

We are committed to responsible practices in the conduct of our business. [Our Code of Business Conduct](#) defines and describes the principles we rely on to carry out our activities and is publicly available at www.greencore.com.

During FY25 we have updated or introduced several policies relating to Human Rights and Responsible Sourcing, to ensure that our expectations are clearly communicated to relevant stakeholders.

These policies, which are also publicly available at www.greencore.com are:

- [Human Rights Policy](#)
- [Responsible Sourcing Policy](#)
- [Supplier Code of Conduct](#)

3.2 Governance

We recognise that strong governance is essential in delivering an effective Human Rights programme. Our governance approach is as follows:

- Our Chief People Officer ('CPO') has accountability for our plan for Human Rights in our Direct Operations, and our Chief Commercial Officer ('CCO') has accountability for our plan for Human Rights in our Global Supply Chain. 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.
- Board focus on the agenda is via 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.

- Our Sustainability Oversight Committee ('SOC') 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 Strategy, including both of our Human Rights agendas.
- At an operational and topic-specific level, we have eight Sustainable Business Management Groups ('SBMGs'), chaired by senior leaders, that provide cross functional forums to develop and steer the implementation of our strategy at an operational level.

Of these SBMGs, two are focussed on our Human Rights programme:

- Human Rights in Direct Operations SBMG.
- Human Rights in Global Supply Chains SBMG.

Prevention of Modern Slavery and Labour Exploitation is a key focus area for both of these groups.

During FY25, in order to drive increased focus on the Human Rights risks in our supply chain, the Human Rights in Global Supply Chains SBMG was created as a group in its own right, with the subject matter previously having been part of the Responsible Sourcing SBMG. This change has enabled us to dedicate more time to the Human Rights agenda and elevate understanding among Senior Leadership.

- Delivery of our sustainability strategy is achieved through a plan ownership model, with plan owners in relevant senior functional roles in the business ensuring that the strategy is part of how we work every day.

These include a HR Director focusing on Human Rights in our Direct Operations and a Procurement Director focusing on Human Rights in our Global Supply Chains. Our Plan Owners are supported by the subject matter experts in our Central Human Rights team in the delivery of these plans.

Progress on the plans is reviewed during the quarterly SBMG meetings and is discussed with the Group Executive twice yearly.

03. Our Policies and Governance continued

Sustainability Governance Structure



3.3 Employment Standards

The Greencore Human Rights Policy affirms our commitment to respecting and promoting human rights across both our direct operations and global supply chain. It establishes clear expectations for Greencore and our suppliers to uphold human rights standards and take proactive steps to prevent abuses, such as forced labour, child labour, unsafe working conditions, and other violations.

It is informed by the International Labour Organisation ('ILO') Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights ('UNGPs').

Delivery of these principles is driven through alignment with the Ethical Trade 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

To support these standards, We are an AB (Buyer/Supplier) member of the Supplier Ethical Data Exchange ('SEDEX'). Each of our manufacturing facilities is registered with SEDEX and regularly updates the self-assessment questionnaire.

All manufacturing sites undergo regular independent ethical audits, to the SMETA standard, conducted by an external accredited audit company.

In last year's modern slavery statement, we described how we had piloted an initial expansion of our site human rights approach into our logistics function.

This included a third-party ethical audit at our Distribution facility in Tamworth.

During FY25 we have built on this successful pilot by undergoing a third-party audit at a further distribution facility, in Hatfield.

In FY26 we will continue to roll the programme out at our other main distribution facility and review learnings from these audits to inform our approach to due diligence throughout the rest of our distribution network.

04. Assessing and Managing Risk

4.1 Managing risk in our own operations

Key Risk Assessment and Management Processes

- **Internal Ethical Audit programme** – During FY25 we have fully revised our Internal Ethical Audit programme, which monitors the activities of Labour Providers and other providers of people services (Third Party Service Providers), for example suppliers of onsite Security and Catering services. Through this programme we aim to ensure that colleagues working within our business via these suppliers enjoy the same protections as our directly employed colleagues.

The updated audit standard is focussed on detecting issues and places significant importance on worker testimony. It applies to all of our manufacturing sites and in-scope¹ distribution facilities and will go live in the first quarter of FY26.

- **Third Party Audit Programme** – Our manufacturing sites and in-scope distribution facilities undergo a third-party audit to the SMETA standard every 2 years. This important external scrutiny helps us to continuously improve standards and increase our vigilance. During FY25 a number of our sites have undergone audits to the latest version of the audit, SMETA 7.0.
- **Stronger Together** – Our manufacturing sites and in-scope distribution facilities individually maintain Stronger Together Business Partner status, which demonstrates a public commitment to tackling labour exploitation. As part of this commitment our site HR Business Partners are required to undergo external training delivered by Stronger Together.

Agency and other labour

Agency colleagues perform an important role in our fast-paced food manufacturing businesses; however we recognise that due to the nature of agency work these colleagues are potentially vulnerable to exploitation.

We also utilise the services of Third-Party Service Providers (e.g. onsite Security and catering), and recognise that these colleagues are also potentially vulnerable to exploitation.

We conduct audits of agency labour and third-party service providers, carried out by our Technical and local HR teams and conducted on a rolling basis through the year. We also continue to conduct extensive due diligence on potential new agency labour providers prior to entering contractual relationships.

Collaboration is key in disrupting exploitation and Greencore work closely with our labour provider partners to share best practice for worker welfare and approaches for addressing modern slavery or labour exploitation risks.

Whistleblowing

We provide an independently operated, external reporting hotline (known as our Speak Up hotline) whereby any of our colleagues, or indeed any third party, can raise concerns in relation to employment standards, ethics or any other area of concern.

Access to the hotline is free and those using it can choose to remain anonymous. The contact details for the hotline are displayed in prominent areas throughout all our sites and on our intranet and website.

Reports received by the external reporting hotline are monitored and investigated. Status updates are reported to the Audit and Risk Committee of our Board on a quarterly basis.

Findings in FY25

During FY25 we have continued to conduct due diligence and monitoring across our business. During this period we did not find any cases of modern slavery.

Nonetheless, we recognise that it is crucial to remain vigilant and to continue to build upon our existing due diligence processes.

¹ In-scope distribution facilities are Tamworth and Hatfield

04. Assessing and Managing Risk continued

4.2 Managing risk in our Global Supply Chain

During FY25, we have continued to apply the risk-based 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 acknowledge that there may be the risk of modern slavery or human trafficking present within them.

We continue to use the Food Network for Ethical Trade (FNET) 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 risk assessment process gives us a number of priority ingredient supply chains which are the subject of increased focus and supplier engagement.

Our priority supply chain risks

The changing nature of global supply chain risks means that there is never a static picture of risk, and we recognise the importance of continuous vigilance through horizon scanning, industry networks and other intelligence. However the following are recognised as some of our key ingredient category risks, which occur at various tiers of our supply chain:

- Fresh produce
- Frozen produce
- Poultry
- Warm-water prawns
- Processed tomatoes
- Tuna
- Herbs & spices
- Rice

These priority risks inform our supplier engagement programme. The engagement programme is supported by our Plan owner for Human Rights in our Global Supply Chains and actions are reported to the Human Rights in Global Supply Chains SBMG.

Supplier Management

We work with suppliers to build effective and transparent supply chains.

We have a rigorous supplier approval process, operated by Procurement and Technical functions.

During FY25 we have introduced an additional stage into the supplier / ingredient approval process that utilises data from the FNET risk assessment tool to deliver an initial assessment of Human Rights risk based on the category and source location of the supplier or ingredient. This enables our Human Rights team to undertake appropriate due diligence on the supplier or ingredient to establish what mitigation is in place or what additional mitigation would be required.

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 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 increasing visibility across our supply base.

Action in high-risk supply chains

During FY25, we have been actively involved in the mitigation of risks in our supply chains, identified by our risk assessment process, by audits or by other intelligence. This work has included:

- Ongoing work with a collaborative multi-stakeholder working group on issues identified in our protein supply chain in Asia, including document retention and worker paid recruitment fees
- Supporting UK based animal protein suppliers with adverse findings from audits relating to recruitment fees and the skilled worker visa scheme
- Supporting a UK based agricultural supplier following adverse findings from an audit relating to recruitment fees and the seasonal worker visa scheme

05. Training, Awareness Raising and Capacity Building

5.1 Training for colleagues working in our direct operations

Existing ongoing training:

We support Stronger Together, a collaborative initiative focussed on responsible recruitment and the prevention of labour exploitation. Each of our manufacturing sites, along with in-scope distribution facilities, is expected to maintain the Stronger Together Business Partner commitment. As part of this commitment, colleagues from our site Human Resources ('HR') teams receive external, expert training on the identification of potential labour exploitation and best practice in responding to these indicators.

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

Training on modern slavery awareness is included in our induction which is delivered to every new starter. This training is under regular review, with an update due to be rolled out during the first quarter of FY26.

New training in FY25

As part of the revision of our internal ethical audit programme mentioned in section 4, we recognised the need for the colleagues delivering this audit to be appropriately trained on both the new audit approach and the increased focus on worker testimony.

During FY25 we created and delivered in-person training to 52 colleagues from our HR, Learning and Development and Technical teams who will conduct the audit.

Training being introduced in FY26

We recognise the importance of equipping colleagues who are best placed to spot signs of modern slavery with the skills, knowledge and confidence to do so.

We are currently developing training for our operational site management teams to help them to spot when something might be wrong and take the appropriate escalation steps. This training will launch in early FY26 and will be reported upon in next years modern slavery statement.



05. Training, Awareness Raising and Capacity Building *continued*

5.2 Training for colleagues working with our Global Supply Chains

We take a hands on, collaborative approach to supplier engagement, placing great value in gaining on the ground insights from our supply chain. This means that our Procurement and Technical colleagues spend a significant amount of time visiting supplier sites at various tiers in many different countries.

To enable these teams to more confidently engage with suppliers on human rights matters during these visits, including spotting the signs of modern slavery, we commissioned bespoke external training through Stronger Together.

This training was delivered to c50 colleagues from our Procurement and Technical functions, across two full-day, in-person workshops during FY25.

5.3 Awareness raising

Lived Experience

As reported in our previous statement, during FY24 we engaged with an external consultancy, Align Ltd, who specialise in Lived Experience of survivors of modern slavery to provide survivor led interventions and insights to businesses.

Following this initial engagement, we have partnered with Align on two further occasions during FY25:

- HR Conference
- Senior Operational Leadership conference

The insights and perspectives shared by the consultant have brought to life the realities of modern slavery to these key stakeholder groups, raising awareness in a unique and powerful way. These engagements have reinforced our commitment to seek out potential issues within our business and supply chain.

We believe that Lived Experience can play a key role in shaping business approach to tackling modern slavery.



06. 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. Collaborating with peers, customers, suppliers and industry experts to share intelligence, pool learnings and drive best practice is an essential part of our approach to tackling labour exploitation.

We continue to engage with the Gangmasters and Labour Abuse Authority (GLAA) and support their work in this area.

Some specific collaborative programmes we are involved with include:

Food Network for Ethical Trade

We are 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.

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

Association of Labour Providers

We are an associate member of the Association of Labour Providers (ALP), a trade association promoting responsible recruitment and good practice for organisations that supply the workforce to the food processing, agricultural and wider consumer goods supply chain.

Through our membership we benefit from expert advice and insights into the UK labour market and the GLAA licensed sector.

Modern Slavery Intelligence Network

The Modern Slavery Intelligence Network ('MSIN') is a pioneering nonprofit 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. MSIN provides a secure platform for sharing

modern slavery data safely and appropriately with wide-ranging stakeholders.

We have continued to actively support the initiative throughout FY25. We see such collaborative programmes as a key resource available to us to actively disrupt Modern Slavery and exploitation.

Issara Institute

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

We remained a Strategic Partner during FY25, giving us access to on the ground worker voice information and detailed insights to challenges facing workers 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.

We maintained membership during FY25 and have benefitted from access to greater insight into 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 Cooperative, a national initiative that aims to fast-track survivors of modern slavery into high quality employment. We joined Bright Future in 2021 and have so far placed eight individuals into our business on a trial basis, with seven of these going on to become permanent Greencore colleagues.

This strong social value initiative helps to diversify our workforce, promote social mobility and tap into resilient and motivated talent. We hope to continue to build on this partnership by providing more opportunities within our business to Bright Future candidates.

07. Tracking Our Progress

We track progress through a number of metrics which monitor our due diligence activities.

Supplier Sedex Registration

Performance FY25:

97.4%

Objective: Tier 1 Ingredient and Packaging suppliers are registered on Sedex.

Commentary: Of the 312 suppliers, 5 have lapsed Sedex accounts and 3 are pending connection on Sedex at the point of data capture.

Stronger Together

Performance FY25

94%

Objective: All in-scope sites have achieved Stronger Together Business Partner status.

Commentary: 17 of 18 in scope sites have status – one site with new HR colleague awaiting training.

Independent Ethical Audit

Performance FY25

100%

Objective: All in-scope sites have undergone a third-party ethical audit in the past 2 years.

Plans for FY26

- Go-live of our revised internal ethical audit programme.
- Go-live of our new training for Operational Site Management teams.
- Increase our awareness raising activities on modern slavery through the delivery of bespoke materials and media within our sites.
- Continue with the rollout of improved human rights due diligence across our logistics function.
- Increase engagement with suppliers of high-risk ingredients, informed by our risk assessment and benefitting from the additional insights we will gather from supplier-facing colleagues having undergone specialist training.



