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# Warburtons Modern Slavery Act

## Compliance Statement 2024/25

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This Statement is published in accordance with s.54 of the Modern Slavery Act 2015. It sets out the steps which Warburtons Limited (“Warburtons”) has taken during the financial year ending 27 September 2025 to prevent modern slavery and human trafficking in its operation and its supply chain.

### 1. Overview of the business

Warburtons is a leading grocery brand in Britain, selling wrapped bakery products and a variety of Free From bakery goods. The make-up of our business broadly remains the same as in previous years. We have a Head Office in Bolton, England, and across the U.K. we now have 12 bakeries and 16 distribution sites. We also operate a subsidiary in Australia. We employ nearly 5,000 people, and work with over 2,400 suppliers across our supply chain. We supply most of the major U.K. supermarkets, as well as convenience stores and discount retailers. Whilst we do export small amounts of our products to Australia and the Middle East, the majority of our business and our operations are focused on the U.K.

Due to our systems and processes (which includes confirming the right to work in the UK, competitive rates of pay and working conditions and employee engagement), we consider our own employed workforce to be at low risk of modern slavery.

### 2. Supply chains

Whilst we have a significant number of suppliers, the majority of our expenditure will be with companies in the U.K. or the European Union. These countries are inherently lower risk from a modern slavery perspective compared to some countries who score less well on the Global Slavery Index. We consider our direct suppliers of utilities, professional services, software and technology, engineering parts and similar suppliers to be equivalently low risk to our own workforce. Many of these suppliers are large, well-established businesses with highly qualified UK based employees. Many of our other suppliers are also low risk, because they are U.K. based and do not operate within sectors known for being exposed to modern slavery.



The Warburtons supply chain is diverse. In order to bake and distribute our products we rely on a wide range of suppliers, including:

- Agency labour to cover sick leave and other absence
- Utilities to help fuel our ovens and keep our factories running
- Flour and other raw materials to make our products
- Packaging to help pack our products
- Vehicles and fuel to get our products to store
- Laundry services for our uniforms and cleaners for our sites
- Software and IT equipment to keep a record of what we do and to help receive orders from customers
- Professional advisors to help us meet our legal duties and to keep on top of our engineering requirements

We recognise that the nature of modern slavery risks will be different for each of these types of suppliers. However, as a long-standing company, many of our suppliers are well known to us. These suppliers will usually reflect the values that we incorporate into our Supplier Code of Conduct and have worked with us for a significant number of years.

The external economic environment has remained challenging over the last financial year, but we are continuing to work constructively with our supply chain to seek to ensure that they do not pursue unethical practices in their own operations.

### **3. Policies in relation to slavery and human trafficking**

Our business is guided by our employee Code of Conduct. This reflects and supplements the four values that were launched at the beginning of the financial year. These values are:

- We are proud to be a family;
- We are obsessed with quality;
- We always do the right thing; and
- We are relentlessly future focussed

The Code of Conduct and the Values reflect the organisation's commitment to achieving the objectives and requirements of the Modern Slavery Act. These are further supported through our policies and procedures which include our whistleblowing policy as well as our supplier on-boarding processes. Through our engagement with the workforce and our suppliers: we strive to ensure that there is no place in our operation or our supply chain for modern slavery.



We continue to govern our modern slavery risks through a stakeholder approach which sees our procurement, legal, HR, responsible business and wheat and flour buying teams working together to ensure that we buy products with ethical sourcing as one of the key pillars of our approach. These teams work to ensure that we buy products and services in the right way and where those suppliers meet the standards of conduct that we would expect.

a. In our own operations

Our own operations have a structured HR function and a range of policies and procedures that are designed to ensure we comply with legal requirements for our workforce, including:

- New employees are required to prove that they have a right to work in the U.K.
- All employees are paid directly to their nominated bank account.
- A whistleblowing helpline is in place that allows any concerns regarding our operations and compliance with the law to be raised.
- Our HR team meet regularly with our two recognised Unions (the Bakers', Food and Allied Workers' Union and the United Road Transport Union).

We are satisfied that our existing employment practices and procedures continue to comply with legal requirements, including in relation to modern slavery and human trafficking. The checks that we have in place have revealed no issues during the financial year that we are reporting on, and no concerns were raised via the whistleblowing helpline or by the recognised Unions.

b. In our Supply Chain

We have a Supplier Code of Conduct, and this requires suppliers to comply with standards based on the Ethical Trading Initiative (ETI) base code. This includes principles such as freely chosen, regular employment. Compliance with our Supplier Code of Conduct (or standards at least equivalent to it) is a material term of our contracts. There are no direct suppliers that have either refused to adopt our Code of Conduct or failed to demonstrate that they have a Code to at least the same standards. No supplier has reported any breaches of the Supplier Code of Conduct in the last 12 months and no supplier has raised any related concerns.

There has therefore been no requirement to undertake any investigations in the last financial year regarding any modern slavery concerns (none having been raised).

Finally, we include the Supplier Code of Conduct within our on-boarding processes for direct suppliers. We continue to take a risk-based approach to



supplier selection and review to ensure that we work with reputable suppliers that reflect our values.

No matters have been raised with us (either formally or informally) in relation to the conduct of our suppliers.

#### **4. Due diligence and steps taken to manage/assess risk**

In addition to our Supplier Code of Conduct, we have continued to use the Supplier Ethical Data Exchange (Sedex) to assess certain suppliers in our supply chain.

As part of our Ethical Sourcing approach, we review the Sedex Self-assessment questionnaires of our Tier 1 suppliers. Using the Sedex Risk assessment matrix, we have identified that none of our suppliers fall into the high-risk category.

We also check our own employee records to ensure that there are no duplicate bank accounts or duplicate home addresses or other obvious signs that might be of concern. There were no concerns raised in respect of financial year 2024/25.

#### **5. Training and capacity building of staff**

Online training continues to be made available on Warburtons' learning platform to all management grades within the company. Training slides are also available for staff on our intranet.

Our Code of Conduct applies to all staff and covers the ethical standards expected of all employees. Behaviour that conflicts with legal requirements is not tolerated within the business. Each year our senior leaders are asked to report on whether they have read the Code and ensured that its requirements have been implemented in the business. 100% of senior leaders gave this attestation for financial year 2024/25. No risks or concerns were raised by our senior leaders.

#### **6. Future Focus**

For the following financial year, we will be focusing on continuing to embed our due diligence and risk assessment processes and having ongoing engagement with key suppliers in the areas of highest risk.

This statement has been approved by the Main Board of Warburtons and signed by the Chairman.

10 March 2026



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