MODERN SLAVERY STATEMENT

1. Introduction 1
2. Overview 1
3. Responsibilities 2
4. Documentation 2
5. Our Commitments 3
6. Risk Assessment and Due Diligence 3
7. Penalties for Breach 4
8. Training & Awareness 4
9. Policies 4
10. Key Performance Indicators and Next Steps 5
11. Board of Directors Approval 5

1. Introduction

"Modern slavery" is a term which covers slavery, servitude, forced and compulsory labour, and human trafficking. It can take many forms including, but not limited to, exercising ownership over a person; coercing or threatening someone to perform work they would not do voluntarily; and arranging or facilitating another person's travel with a view to them being exploited, even where the person consents to the travel.

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and sets out the steps that Whitworth Bros Ltd has taken and will continue to take to ensure that modern slavery and human trafficking have no place in our organisation or supply chain.

2. Overview

Whitworth Bros Ltd is one of the UK's largest flour millers employing around 620 people across 7 main locations, namely Wellingborough, Northamptonshire; Dogsthorpe, Peterborough; Worksop, Nottinghamshire; Whitley Bridge, North Yorkshire; Holbeach, Lincolnshire; Selby, North Yorkshire; and Manchester.

We produce bulk and bagged specialty flours, as well as maize and rice products, for customers ranging from large industrial food manufacturers and large and small retailers through to small local bakers. Grain is sourced from approved suppliers, including larger cooperative farmer-owned grain stores, general merchants and some off-farmsupplies.

The Board of Directors for Whitworth Bros Ltd includes the Chairman, Managing Director, Finance Director, Milling & Technical Director, Operations Director, Sales Director, and Purchasing Director. This Board reports to the Board of Directors for Whitworth Holdings Ltd which is the umbrella company, also based in the UK.

We work closely with our main suppliers and customers; with our employees and their representatives, including Trade Union relationships; and with other trade bodies, such as UK Flour Millers. We comply with the SMETA Best Practice Guidance to ensure the highest level of compliance, ethics, food manufacturing standards and ethical trading initiatives.

3. Responsibilities

The **Directors** of Whitworth Bros Ltd are responsible for overseeing our efforts to eliminate modern slavery and for monitoring progress against the KPIs contained in this document. Progress is measured regularly and is on our rolling agenda for quarterly Board meetings.

The **HR Department and our Line Managers** are responsible for ensuring the compliance of recruitment activity and terms and conditions of employment with statutory requirements, with guidance from our lawyers, and that any agencies used are appropriately checked and commit to ethical standards.

Line Managers are responsible for upholding our "Core Values", in addition to ensuring that employees who work for them are educated and behave in accordance with these.

Our **Finance Team** takes responsibility for ensuring that appropriate checks are made before approval is given to use any new suppliers. Trading will not be permitted without appropriate checks being made. In addition, where judged appropriate, new andexisting suppliers are visited on site to ensure adherence to our standards of ethically transparent supply chains.

Our **Sales Director** and **QA Department** work with our major customers to provide them with appropriate information on our modern slavery statement and policy and to gain suggestions and feedback.

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. This statement reflects our commitment and details the action we have taken to act ethically and with integrity in all our business relationships, and to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

4. Documentation

From 2014, we issued our strategic suppliers with our Ethical Statement for Suppliers and requested them to sign to confirm that they comply with it and to let us know if they have any issues in doing so.

In August 2026, we replaced our Ethical Statement for Suppliers with a Supply Chain Code of Conduct. Our Supply Chain Code of Conduct sets out full details of the minimum standards for employment and working conditions that we require from our suppliers. This increased our expectation that suppliers demonstrate their commitment to compliance in areas including discrimination and harassment, tax compliance, packaging tax, inclusive sourcing and environmental standards.

Also, in October 2017 we added our "Commitment to the ETI Base Code" to our suite of policies for our employees and workers and how to report any concerns.

In February 2018, we launched our "Agency Workers Agreement", which all agency staff are required to sign on their first day with us. This agreement confirms that the agency worker is not being treated inhumanely by the agency and provides information on how to raise any concerns.

We comply with the Sedex Best Practice Guidance and are accredited via the SMETA Ethical Trade Audit. This covers labour standards, health and safety, environment and business ethics.

We regularly review and update our Self-Assessment Questionnaires for all seven of our sites on the Sedex portal so that all our customers are aware of our commitments as a responsible employer and supplier.

5. Our Commitments

Employees: all new employees are appointed directly, and checks are made of their right to work in the UK. We conform to the ethical standards set out in the SMETA accreditation process. There is no forced, bonded or involuntary labour. Staff turnover is very low andall overtime is completed on a voluntary basis.

Agency Workers: the use of agency workers is limited to where necessary and only for temporary placements. We ensure the suppliers we use have given us written confirmation that no agency worker is being exploited as part of any slavery or human trafficking. In addition, and also in order to ensure that there is no forced, bonded or child labour, Line Managers check during the induction of any agency worker that he/she is aged over 16, has not paid any recruitment fees in order to procure the work, has not been required to forfeit his/her passport and is free to leave the agency if he/she wishes. The agency worker is asked to sign our "Agency Workers Agreement" to confirm that they are not being treated inhumanely and that they are aware of how to raise any concerns.

Suppliers of Raw Materials: we embrace socially responsible trading, and all suppliers areissued with our Supply Chain Code of Conduct, which they commit to and which sets out key minimum standards relating to employment and workers.

Major Suppliers: all suppliers are requested to report to us the steps that they are taking to eliminate modern slavery within their organisation.

Customers: we also work closely with our major customers to ensure that we comply with any employment practices and procedures specified in their audits including their systems to mitigate the risks of slavery and human trafficking.

6. Risk Assessment and Due Diligence

The risk of slavery and human trafficking within our own organisation is substantially mitigated because of the strict policies and procedures we have in place, the oversight built into our business operations, and the knowledge and skill of our staff. We assess risk based on several factors such as geographical risk indices pertaining to human rights, the level of supply chain control, external governance factors, and the levels of political stability.

We consider that the most significant risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

We undertake due diligence when considering new suppliers and regularly review our existing suppliers. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess products or geographical areas for risk of slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risk of suppliers through a third-party company (Sedex), who send out cloud-based desktop audits which are reviewed by qualified social compliance auditors.
- Where the desktop audits identify risks, corrective action plans are sent out to our suppliers that do not meet compliance or our expectations.
- Conducting supplier audits using accredited third-party auditors.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan. Serious violations of our policies lead to termination of our business relationships.

7. Penalties for Breach

If a supplier is found to be involved in any form of modern slavery, its contract may be terminated either immediately or on its due renewal date, depending on the severity of the breach.

Contractual penalties may be awarded against any supplier for a breach of contract, or for incorrect self-auditing responses, questionnaires or the giving of incorrect information.

If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, they will be subject to the Company's disciplinary procedure.

8. Training & Awareness

We ensure that we have competency within our organisation through training relating to human rights and awareness of the social accountability standard SA8000. We use accredited third-party supplier auditors, SGS United Kingdom Ltd, who are trained social compliance auditors, to work with and advise our management team and employees.

Human rights awareness training has been further directed to personnel who work in human resources and corporate affairs. Specific supplier standards training is directed at procurement personnel. More general awareness is available throughout the wider organisation through our relevant policies.

We have instructed a third party to handle our whistleblowing telephone line, ensuring people have a means by which to report issues without having to deal directlywith the Company.

We are committed to raising awareness across the company by utilising our regular Team Briefs, display boards and TV screens.

9. Policies

We have the following HR policies in place for employees:

- The Company maintains a suite of HR policies that support ethical employment standards, fair treatment, employee wellbeing, grievance handling, whistleblowing, recruitment, data protection, equal opportunities, disciplinary procedures, and learning and development. These policies are referenced in the employee handbook and are available on the shared network drive, with hard copies made available to employees in departments without computer access.

These are referenced in our employee handbook and copies are readily available on our shared network drive in the Company Policies and Procedures folder. Hard copies are made available to employees within departments without access to a computer.

All HR policies are reviewed regularly to ensure they are legally compliant, in line with our ethical standards and fit for purpose.

10. Key Performance Indicators and Next Steps

In 2026, we will use the following means to measure how effective we have been in ensuring that slavery and human trafficking are not taking place in any part of our businessor our supply chains:

Through our ongoing agreement with Sedex:

- We will continue awareness training.
- Our supply chain continues to be mapped and updated as and when we add or change suppliers.

- Our suppliers will complete self-assessment questionnaires via the Sedex portal and will be given a risk rating.
- On-site auditing will be carried out where necessary with our high-risk suppliers and corrective action follow-ups performed where necessary.

We will continue to regularly review and revise our Core Values and Company Policies and Procedures.

We will continue to record, monitor and follow up complaints raised through our grievance and/or whistleblowing procedures which relate to modern slavery, ensuring that all necessary remedial action is taken. We will maintain a record of suppliers who are terminated due to allegations of modern slavery.

We will continue to ensure our suppliers have signed up to our Supply Chain Code of Conduct.

We will update our induction plan for new starters to ensure they are fully aware of our commitment to ensuring there is no modern slavery in any part of our business or supply chains.

11. Board of Directors Approval

Whitworth Bros Ltd will never knowingly enter a business relationship with any organisation involved with slavery, servitude or human trafficking. The senior management of the company accepts responsibility for the implementation of any policy in relation to this matter and for the provision of adequate resources to ensure that slavery, servitude or human trafficking is not taking place in the company or its supply chain.

This statement has been approved by the Directors and will be reviewed annually.

Signed:

Date: 14/10/26

Name: Neil Fyfe

Role: Managing Director