



SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

The Keswick Group Limited is committed to improving our practices to combat modern slavery and human trafficking.

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps we have taken, and continue to take, to ensure that modern slavery and human trafficking are not taking place in our business or supply chains.

THE KESWICK GROUP STRUCTURE

The Keswick Group is a UK-based group of trading companies specialising in supply chain, co-packing, fulfilment, mailing house, food services, hospitality management/support and related businesses. We employ over 200 permanent staff and operate both in the UK and internationally.

OUR BUSINESS AND OUR SUPPLY CHAINS

Our operations are organised into 5 business units. Given the nature and scale of our activities, we rely on a broad range of suppliers and partners to support our service delivery, including third-party labour providers during seasonal peaks.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Modern slavery is a crime and a serious violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own operations, or in any of our supply chains.

We are also committed to ensuring there is transparency in our approach to tackling modern slavery throughout our business relationships, consistent with our obligations under the Modern Slavery Act 2015. As part of this process, we have undertaken a review of our supply chain to identify and assess potential risk areas and maintain a register detailing the same.

Our preference is to employ a core team of permanent staff. However, due to the seasonal nature of our business, we also work with temporary agency staff.

To safeguard those arrangements:

- We only use agencies selected through competitive tender processes.
- All agencies must be GLAA-licensed and members of the Stronger Together network.
- We carry out random interviews with agency staff using a standard GLAA-approved questionnaire to identify any indicators of modern slavery.

This commitment is embedded into our contracts with agency partners, including formal Service Level Agreements with them.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems 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.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a supply chain compliance programme.

This is driven by our Supplier Self-Assessment Questionnaire (SAQ).

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Financial Control.
- Human Resources.
- Procurement.
- Sales.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

We also require our business partners to provide training to their staff and suppliers and providers.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our operations or supply chains.

We work with an independent third party, Stronger Together, to conduct to bring insights on ways to we can tackle slavery and human trafficking. We are regularly audited (at our expense) for ethical performance against International Standards by both SEDEX and EcoVadis, to assess (amongst other aspects of Ethical Trading) how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our operations or supply chains.

FURTHER STEPS

Following on-going reviews of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we run a programme of continuous improvement in to combating the evil of modern slavery and human trafficking

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025.

Keswick Enterprises Group Limited