

| | | | | |
|--------------|-------------------------------|-----------------------|--------------------|---------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Modern Slavery Statement

Modern Slavery Statement 2023

**Associated
British Foods
plc**

This statement is made on behalf of Associated British Foods plc (ABF) and all relevant entities within the ABF group (Group), pursuant to section 54(1) of the UK Modern Slavery Act 2015. It sets out the steps taken to mitigate the risk of modern slavery occurring within our businesses' operations and supply chains.

This statement was approved by the Board of ABF on 1 November 2023.

Relevant entities include but are not limited to: AB Agri Limited; AB World Foods Limited; ABF Grain Products Limited; Allied Mills Limited; British Sugar plc; Cereform Limited; Primark Limited; Primark Stores Limited; R. Twining and Company Limited; and Vivergo Fuels Limited. Several Group businesses, including some not within the scope of the UK Modern Slavery Act 2015, also publish separate or supplemental modern slavery statements. For a full list of ABF subsidiary undertakings, please see note 29 of the notes to our financial statements in our [2023 Annual Report and Accounts](#).

Introduction

Modern slavery is a global issue that can occur in many different forms, including but not limited to forced labour, child labour and human trafficking. Figures published by the United Nations in September 2022 estimate that 27.6 million people are in forced labour. This is a significant increase in the number of people globally in modern slavery compared to the last figures from 2016.¹

As a Group with international businesses with far-reaching and complex supply chains, we recognise the important role we can play in addressing the risks of forced labour. We expect our businesses to carry out due diligence on the risks of forced labour in their own operations and supply chains and also to provide remediation to those who have been impacted where this is appropriate. We expect our businesses to apply the principles set out in our Group Supplier Code of Conduct, including our zero tolerance for forced labour and modern slavery, and some of them do this through their own equivalent supplier codes of conduct. Please see our Group Supplier Code of Conduct for more information.

We recognise the importance of the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidelines on Responsible Business Conduct, which requires businesses to:

- embed responsible business conduct into policies and management systems;
- identify and assess actual and potential adverse impacts associated with the enterprise's operations, products, or services;
- cease, prevent and mitigate adverse impacts;
- track implementation and results;
- communicate how impacts are addressed; and
- provide for and co-operate in remediation when appropriate.

This statement contains the steps we are taking to address the risks of modern slavery. We value our ongoing engagement and collaboration with a broad range of interested and concerned stakeholder groups as part of our due diligence process and we welcome feedback from stakeholders on our approach.

1. https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm
<https://www.oecd.org/investment/due-diligence-guidance-for-responsiblebusiness-conduct.htm>

| | | | | |
|--------------|--------------------------------------|-----------------------|--------------------|---------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

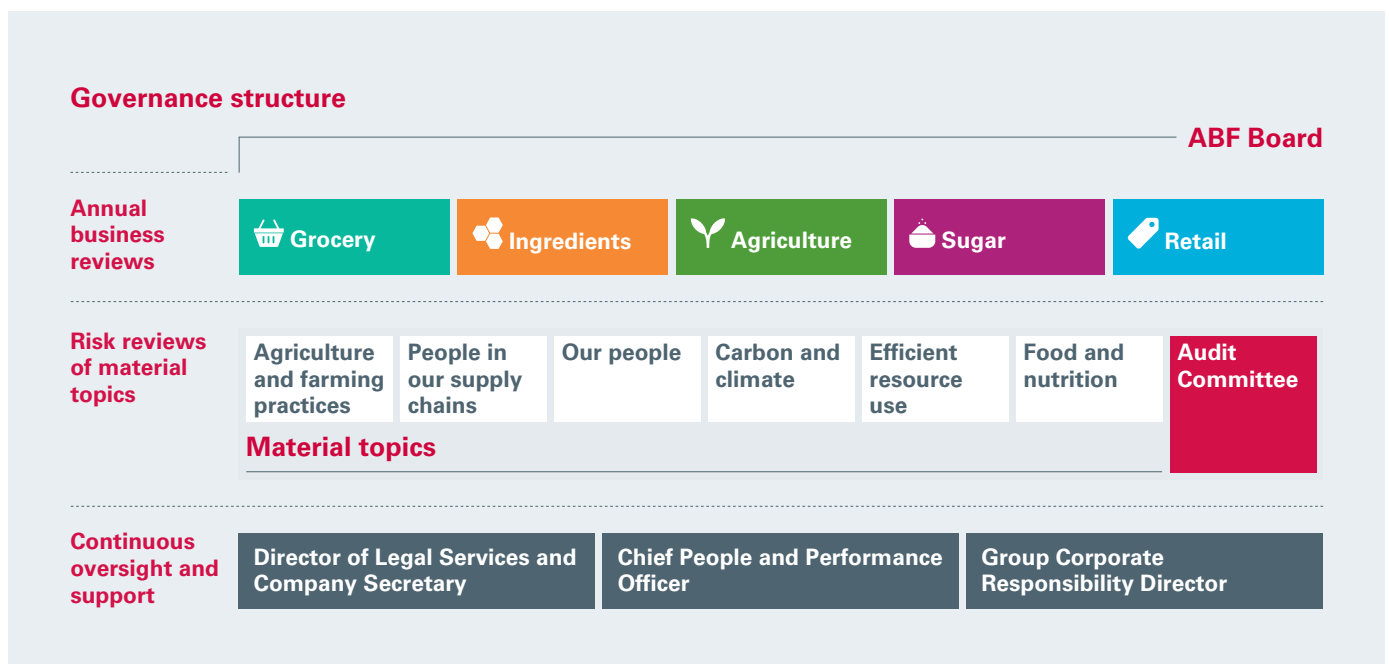
Governance and accountability

ABF is a diversified international food, ingredients, and retail group with revenues of £19.8 billion, 133,000 employee operations in 55 countries across Europe, Africa, the Americas, Asia and Australia. We operate a devolved operating model across our five business segments of Grocery, Ingredients, Agriculture, Sugar and Retail.

Within our individual businesses, responsibility and accountability for risk management, including that of human rights and modern slavery, sits with the CEO of each business.

Each business has its own approach to risk management and submits its own annual review of those risks to the Board of ABF. You can read more about our Group approach to risk management in the 'Managing our risks' section within our 2023 Annual Report.

As a Group, we engage across our businesses to share information on risks by convening cross-business and cross-divisional learning, particularly where those risks are systemic and/or severe, such as the risks of state-sponsored forced labour or the exploitation of migrant workers.



Support for emerging legislation

Our businesses operate in a landscape where global policy and legislation on human rights, and particularly the risk of forced labour, is shifting and evolving rapidly. Ensuring that our businesses are prepared for new legislative requirements is essential and built into our approach.

This includes responding to new legislative proposals from national governments and the European Commission on responsible business conduct and due diligence. Following a ban on the importation of products made with forced labour in the Xinjiang Uyghur Autonomous Region (China) into the United States, the EU has also outlined its proposal for a ban on goods made with forced labour.

As a global Group with a Supplier Code of Conduct prohibiting modern slavery, we are supportive of policy and legislative measures to address the risks of forced labour. We can in turn support such measures by sharing our learnings with policy makers on how to address the risks of modern slavery in business effectively.

| | | | | |
|--------------|-------------------------------|------------------------------|--------------------|---------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Embedding responsible business conduct in policy and management

Our Group Supplier Code of Conduct covers the following principles:

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour shall not be used;
5. Land acquisition;
6. Living wages are paid;
7. Working hours are not excessive;
8. No discrimination is practised;
9. Regular employment is provided;
10. No harsh or inhumane treatment is allowed;
11. Confidentiality;
12. No bribery or corruption will be tolerated;
13. Environmental management;
14. Quality; and
15. Audit and termination of agreements.

Specifically on the risks of modern slavery, our Supplier Code of Conduct mandates that:

- There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour, and workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice or as required by law.

We are also aware that the signs of forced labour can be manifested through a range of factors. The International Labour Organization (ILO) lists 11 forced labour indicators. Forced labour may be the result of one single indicator, or a combination of multiple indicators.

Many of our businesses have developed additional policies that support and strengthen the implementation of our Group Supplier Code of Conduct, often through consultation and engagement with stakeholders and third-party technical experts.

- **Primark and Twinings Ovaltine** both have standalone human rights policies² which discuss their approach to due diligence in their supply chains.
- **AB Agri** has an internal Responsible Sourcing Policy and newly developed Responsible Sourcing Standards covering its sourcing approach and the processes required for different sourcing categories.
- **Westmill, Jordans Dorset Ryvita and Allied Milling and Baking** have a Preventing Hidden Labour Exploitation Policy to support the recruitment and employment of permanent and temporary agency employees across their own operations and supply chains. This internal document was drafted in accordance with guidance from Stronger Together, an expert independent organisation that provides businesses with training, resources and collaborative programmes on responsible recruitment to prevent labour exploitation within supply chains.

It is important that workers, and those most at risk of modern slavery, can access relevant policies and understand their rights within the workplace. They should also have access to an effective grievance mechanism. Primark's Supplier Code of Conduct has been translated into 44 languages, all those spoken by workers in its supply chain. All of Primark's suppliers' tier 1 factories are required to display its Supplier Code of Conduct in the local language in the workplace.

2. https://primark.a.bigcontent.io/v1/static/supply_chain_human_rights_policy
<https://cdn.shopify.com/s/files/1/0711/2087/9893/files/two-human-rights-policy.pdf?v=1685560032>

| | | | | |
|--------------|-------------------------------|-----------------------|--------------------------|---------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Identifying actual and potential harms

Businesses within the Group are responsible for mapping their operations and supply chains in order to identify where their key risks are present. Several businesses have published interactive 'maps' which are updated regularly and show where products are harvested, processed and manufactured, dependent on the specific business.

Many of our businesses assess the potential and actual risks of modern slavery within their operations and supply chains and prioritise those which are most salient, i.e. those with the most severe negative impact. This may include the country of origin, the product or industry characteristics such as seasonal cycles and workforce characteristics such as migrant workers.

To do this, those businesses use a range of credible external and internal resources such as Verisk Maplecroft's risk assessment tool, which provides country risk data on over 200 commodities, and/or information from the Supplier Ethical Data Exchange (Sedex). They also refer to industry bodies, in-depth site and supply chain audits, assessment, investigations and stakeholder reports including those from intergovernmental organisations, civil society and human rights watchdogs, as well as intelligence gathered from teams in our operations and sourcing locations.

As a Group, we engage across our businesses to share information and learning on cross-cutting and critical issues, particularly where risks are systemic, severe and may require enhanced due diligence.

Examples from the businesses

AB Agri identifies human and labour rights risks for certain raw materials using the Verisk Maplecroft global risk analysis tool and Sedex assessments. It also works with its suppliers collaboratively to understand the country of origin of the feed materials purchased as the first stage of risk evaluation, which has now been determined for more than 95% of its raw materials.

AB World Foods and Westmill Foods are members of the Sustainable Spice Initiative (SSI) and participate in the SSI Impact Groups focusing on living wages, child labour and climate risks. The SSI conducts specific studies into these risks and into other risks where these are identified.

AB World Foods and Westmill Foods both have significant supply chain linkages to India and Asia, and aligned to appoint a specialist ethical sourcing manager for the region and agree a specific work programme to help facilitate supply chain risk assessment and management programmes in India, Pakistan and Thailand.

Primark's Ethical Trade and Environmental Sustainability team has over 130 people in its 12 key sourcing markets. The team works across all aspects of human rights and environmental due diligence, from strategy and risk assessment to supporting suppliers' and their factories' implementation of the Primark Supplier Code of Conduct. Primark's Ethical Trade auditing and monitoring programme supports its implementation of human rights due diligence in its product supply chain. Through this programme, Primark conducted 2,360 audits during 2022, most of which were unannounced. Primark carries the full cost of these audits, which include rigorous checks for issues related to the Primark Supplier Code of Conduct, based on first-hand assessment of the working environment, reviews of relevant documentation and confidential worker interviews. At the end of the audit, supplier factories are issued with a time-bound corrective action plan that outlines any areas for improvement.

ABF Sugar's businesses have complex and diverse supply chains that cross multiple sectors, such as engineering, manufacturing and agriculture, and they partner with over 25,000 growers worldwide. Agriculture is acknowledged as a high-priority sector when it comes to modern slavery risks globally. Each business within ABF Sugar has undertaken its own risk mapping exercise. This is an ongoing process, factoring in emerging challenges and trends such as migration.

Many of the ABF Sugar businesses are also part of third-party certification schemes, such as Red Tractor (UK) and Sustainable Agriculture Initiative (SAI) Platform, SAI Platform Farm Sustainability Assessment (FSA) 3.0, and Fairtrade, which require supply chain transparency and verified chain of custody elements. This aids the businesses' approach to responsible sourcing and supply chain mapping. Key risks identified include:

- AB Sugar China – Services (haulage) and workforce (seasonal and agency) used by growers;
- Azucarera – Purchasing of raw cane for the sugar refinery in Guadalete, Spain;
- British Sugar – Bought-in products such as packaging from overseas; and
- Illovo Sugar Africa – Services such as cane cutting supplied to growers and female agency workers in the company's whole supply chain whether working on estates, with growers or service providers.

Twinings' website includes a sourcing map that details where its tea and key herbs are sourced. It includes the details of every tea garden Twinings buys from as well as the origins of its key herbs.

The map is available here. <https://www.sourcedwithcare.com/en/our-approach/sourcing-map/>

Primark's global sourcing map shows information about the factories that manufacture products for Primark including factory names, addresses, and key indicators such as the number of workers and gender split of the workforce.

The map is available here. <https://globalsourcingmap.primark.com/en/>

| | | | | |
|--------------|-------------------------------|-----------------------|--------------------------|---------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Examples from the businesses *continued*

Jordans Dorset Ryvita has a global supply chain and, in some cases, ingredients are purchased from extended supply chains involving traders and brokers. Steps are taken to identify risks in supply chains and to monitor risk assessments as required. Due diligence is undertaken when considering taking on new suppliers and regular reviews of existing suppliers are conducted.

Jordans Dorset Ryvita recognises that temporary workers are a particular risk group in respect of modern slavery, and it works closely with existing suppliers to mitigate the risk of potential labour exploitation. Agency suppliers are fully licensed and comply with the company's Recruiter Compliance Principles. Specific questions have been introduced to interview templates to encourage conversation on how the applicant heard about the role and whether any money has been exchanged in relation to the role.

Jordans Dorset Ryvita recognises that its supply chains are not the only area where people may be at risk of modern slavery in the context of its business. As such, six-monthly checks are undertaken within its own business operations to identify any areas of concern associated with shared addresses or bank accounts for employees as this could indicate the existence of modern slavery.

Jordans Dorset Ryvita's key suppliers who provide manufacturing ingredients and materials are linked to the business on Sedex. Jordans Dorset Ryvita carries out a review that consists of three stages of risk assessment plus remediation and reporting. A range of qualitative and quantitative data sources are used to conduct the risk assessments, including but not limited to Sedex, Verisk Maplecroft, BRC, and four-pillar SMETA (Sedex Members Ethical Trade Audit) data. A representative from each site has taken responsibility for updating Sedex to improve the quality and detail of the information.

The **Twinings** Community Needs Assessment (TCNA) framework has been created in consultation with expert organisations including WaterAid, UNICEF, Conservation International, Solidaridad, Oxfam and GAIN to help it assess and understand tea-growing communities' needs on the ground.

Assessments are carried out on a rolling basis every two to three years by the Social Impact team, covering housing, water and sanitation, health and nutrition, gender, children's rights, labour standards, natural resources, and income. For smallholder farmers, the TCNA also incorporates farming practices and land rights. Twinings has conducted TCNAs in communities connected to tea gardens in its key sourcing regions, including Argentina, China, India, Indonesia, Kenya, and Sri Lanka. Following the TCNA, Twinings works with producers to develop an action plan to address prioritised issues and monitor improvements over time. It also uses the findings to help develop tailored interventions.

In 2017 and 2022, **Twinings** conducted saliency reviews following the framework set out in the UNGPs to identify and prioritise its most likely salient human rights risks.

This process included assessing through:

- external sources such as Verisk Maplecroft, World Bank, ILO, ITUC and UNICEF;
- desk-based research and interviews with human rights experts and non-governmental organisations (NGOs) to understand how the risk landscape is changing; and
- Twinings' own data sources, such as adverse impacts and risks identified in its own operations, in supplier audit reports and during TCNAs, to understand human rights risks in its supply chain by product type.

This data was then analysed to identify and prioritise the most severe human rights risks. The data supported Twinings' existing understanding of its supply chain risks, while also highlighting new causes of potentially salient human rights risks. COVID-19, for example, heightened the risk of forced labour in the tea sector in general due to business shutdowns, unemployment, loss of livelihoods and a lack of social protection systems.

| | | | | |
|--------------|-------------------------------|-----------------------|--------------------|-----------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Training

Ensuring that businesses provide training to raise awareness of the risks of modern slavery continues to be a key focal point for ABF.

Our online training module is designed to raise awareness of modern slavery. The course seeks to educate staff within our businesses on modern slavery and forced labour, providing real-life examples, and highlighting the importance of managing known risks. The course also outlines how those operating in our businesses' supply chains can help to address the risk of modern slavery and human trafficking.

Many of our businesses have developed their own additional training materials to address specific risks, and partner with NGOs and other external experts to provide training for suppliers and workers in their supply chain.

Jordans Dorset Ryvita employees in the Procurement and Human Resources teams received tailored briefings using training material from Stronger Together on the signs and risks associated with modern slavery and hidden labour exploitation.

ABF Sugar trains its own staff and also works alongside partners in its supply chain.

This year its training programme included:

- online training on modern slavery for all line managers in Illovo business units; and
- engagement with business teams to embed ABF Sugar's Modern Slavery toolkit, and develop an understanding of human rights and modern slavery risks and how to identify challenges.

Over 100 **AB World Foods** colleagues have now completed the ABF modern slavery online training module and all new starters receive training on modern slavery.

Primark delivers training directly to employees in relevant roles through dedicated training seminars designed to promote awareness and mitigate and prevent risks. Highlights from the year under review include:

- developing a training module to improve awareness of responsible purchasing practice commitments in collaboration with the Action Collaboration Transformation (ACT) using the Primark Digital Learning Platform. This was completed by 637 Primark colleagues in Buying, Merchandising, Design, Quality and Sourcing; and
- providing human rights due diligence training and awareness-raising session for 94 members of the Ethical Trade and Environmental Sustainability team, with additional sessions rolled out to other relevant departments and several key external service providers.

| | | | | |
|--------------|-------------------------------|-----------------------|--------------------|---------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Addressing risks – cease, prevent, mitigate

To address any risks identified, our businesses develop their own range of appropriate measures. These range from corrective action plans resulting from any audits or assessments conducted or commissioned, through to more long-term and outcome-orientated solutions. Often these longer-term programmes are in partnership with expert organisations and stakeholders. Solutions may also include, where appropriate, the provision of remedy for those that have been adversely impacted.

Evidence points to the fact that, in many cases, addressing modern slavery, particularly where the risks are endemic and systemic, requires a longer-term approach with the engagement and support of stakeholders including government, intergovernmental organisations, civil society, industry, and worker rights representatives.

Along with other brands, UK grocery businesses **AB World Foods, Jordans Dorset Ryvita and Speedibake** are supporting an active and longstanding supply chain engagement programme in Turkey linked primarily to the growing, harvesting and processing of vine fruit products such as raisins and sultanas. Over the past five years the businesses have employed a dedicated ethical supply chain manager in Turkey to help oversee their work with suppliers and engagement with both the Turkish Government and local NGOs, specifically including the Fair Labor Association (FLA).

Since October 2022, the businesses have also started to engage structurally with key suppliers of vine fruit from the region to try to establish common management controls aligned to the requirements under Turkish law that prevent young people working on farms and to ensure that workers in the supply chain are treated fairly.

AB World Foods and Jordans Dorset Ryvita supported summer school programmes in 2022 and 2023 for the children of migrant workers who travel across the country to assist with the harvesting of a wide range of agricultural produce including grapes.

As part of this work the businesses have also reshaped their procurement contracts to reward those processors that are most engaged in the programme with additional volume in recognition of their support.

Primark's 'My Journey' is a training and awareness programme focused on modern slavery and forced labour in South India aimed at factory management. The region is a hub for spinning and fabric mills and many workers migrate there from different regions across India. Workers in this region, both local and domestic migrants, have been identified as vulnerable and at risk of forced labour. Recruitment and hiring practices are a key source of these risks.

The programme trains all staff and workers in a factory who are involved in the recruitment and hiring of workers. It helps them understand the potential risks of forced labour involved in these processes, and how they can help to address them, for example, by making sure that all new recruits have contracts that they understand and that they have not paid recruitment fees to secure their job.

To date, 80 factories have received training and support under the programme. A survey on the outcomes of the project found that 67% of surveyed factories had developed new recruitment policies and procedures as a result of the programme. The remaining 33% had modified existing processes already in place. In addition, 80% of the participating factories confirmed that they had improved inter-departmental and management interaction following the training, improving shift planning and co-ordination among factory departments.

The tea sector

In February 2023, the BBC aired a Panorama programme which exposed serious abuses of workers' rights and gender-based violence in two tea gardens in Kenya, including issues classed as indicators of forced labour by the UN's International Labour Organization.³

Kenya is a key sourcing country for Twinings, and while it was not implicated in the programme, it was sourcing tea from one of the two gardens cited in the programme. Twinings was appalled and deeply concerned by what was shown in the documentary, as gender-based violence has no place in its organisation or supply chain and as such contravened the Twinings Ovaltine Code of Conduct. This Code, like ABF's, is based on the labour conventions of the ILO and the Ethical Trading Initiative (ETI) Base Code and outlines the standards it expects of its suppliers.

While Twinings has its own established approach to understanding the needs of workers in its supply chain, it did not find any evidence of the specific issues raised by the BBC prior to the programme airing. However, following the documentary, Twinings paused placing any new orders with the supplier while the supplier commissioned a specialist NGO, Partner Africa, to carry out an independent investigation into the issues raised. Twinings' Social Impact team remains in close contact with the supplier in order to monitor its ongoing progress with remediation, including through a steering group set up by the supplier. This steering group, which is chaired by the ETI and includes the supplier, retailers and the Ethical Tea Partnership, was established to have oversight of the ongoing NGO investigation.

Twinings has been working hard for many years to improve standards in the sector. It welcomes the focus that the BBC's Panorama programme has brought to these issues and hopes that in doing so it will help to bring about improved standards and human rights across the industry. More information on Twinings' approach to understanding the needs of workers in its supply chain can be found in the ABF 2023 Responsibility Report and in the Twinings' Human Rights Update 2023 .

3. https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_203832.pdf

| | | | | |
|--------------|-------------------------------|-----------------------|--------------------|---------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Addressing risks – cease, prevent, mitigate *continued*

Spotlight on responsible recruitment

Recruitment and hiring practices are one of the most common ways in which workers in all sectors can be exploited and are at risk of modern slavery. The ILO includes deception and debt bondage within the recruitment process as indicators of forced labour.

Primark has taken the following steps to address this risk as part of its due diligence:

- Primark supports the Employer Pays Principle (EPP), which means that no worker in its supply chain should pay for their job and that any costs associated with their recruitment should be paid for by the employer, as set out in Primark's Supplier Code of Conduct;
- Primark's Supplier Code of Conduct permits suppliers to use agency and contract workers, provided they are afforded the full rights set out in the Supplier Code of Conduct. Primark has provided training to suppliers to ensure they are aware of the risks and Primark's requirements;
- Primark may conduct additional due diligence on suppliers that hire migrant, contract and agency workers. Migrant, contract and agency workers can be more vulnerable to recruitment practices that may result in forced, indentured and bonded labour;
- Where Primark has identified that recruitment fees have been paid by workers, it has worked with the supplier(s) with the objective of providing remedy in the form of reimbursement fees to workers; and
- Primark does not source from supply chains with severe risks of forced labour, including through recruitment practices, and where it is unable to conduct due diligence in full. It is for this reason that in September 2022 Primark announced it would be conducting a responsible exit from Myanmar. This followed a report by the ETI into the garment sector in Myanmar following the military coup in February 2021. Primark's exit process has involved extensive consultation with a range of stakeholders including IndustriALL, the global union which represent workers in the garment industry.

Since 2019, in Malaysia and more recently in Thailand, **Ovaltine** has been commissioning in-depth assessments with expert labour rights organisations (specifically, Impacct and LRQA) in the factories of all suppliers and business partners where migrant workers are present.

These in-depth audits take a worker-centric approach and seek to understand the entire recruitment journey as well as the current experience of migrant workers.

Where issues have been identified, the business has worked intensively with its supply chain partners to address these risks. This has included suppliers refunding all previous worker fees, returning passports and providing in-depth training for supply chain partners and the labour agencies they used on eliminating recruitment fees going forward. To date, **Ovaltine** has facilitated USD 180,130 refunded in recruitment fees to workers within its supply chain.

| | | | | |
|--------------|-------------------------------|-----------------------------|--------------------|---------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Grievance mechanisms

ABF encourages an open culture in all dealings between employees and people with whom we and our businesses come into contact. Honest communication is essential if malpractice and wrongdoing are to be dealt with effectively. Our Speak Up Policy sets out guidelines for the employees of ABF and its businesses who wish to raise issues in confidence; these could include forced labour concerns. We provide an external advisory service for all staff, including casual or agency staff, and make every effort to protect the confidentiality of those who raise concerns.

Several businesses within the Group have implemented additional grievance mechanisms to enable those affected by modern slavery, including workers in their supply chains, to raise concerns directly or through partnerships.

ABF Sugar's 'We Listen, We Act, We Remedy' sets out the business's approach and policy related to grievances raised by those in its own operations and those that represent rightsholders in its supply chains. Any grievances related to modern slavery, including forced labour, bonded labour, child labour, human trafficking or inhumane treatment, are fast-tracked to the Director of ESG for ABF Sugar within 24 hours.

Primark's work on grievance mechanisms includes helping factories to strengthen their own internal grievance procedures as well as supporting various external independent mechanisms.

- **Amader Kotha, Bangladesh** – Amader Kotha is a helpline established in 2014 as a mechanism for workers to report grievances in the garment sector in Bangladesh. It is an independent initiative available to all garment workers with the support of factories and brands.

Primark's team in Bangladesh plays a critical role in building awareness of, and trust in, Amader Kotha, and team members repeatedly see an uptick in grievances reported from factories they have visited to talk about the hotline to workers and management. Between May and September 2022 the team trained over 4,000 workers and 140 managers at 25 factories.

Primark is also participating in the 'Safer Together' initiative of Amader Kotha run by Columbia Business School and their partners. This involves research into the effectiveness of a new reporting option for workers, a reporting escrow, whereby workers can choose to create a report with the helpline that is only escalated if a predetermined number of similar reports are made. The hypothesis is that workers, especially women, may prefer to use this option as they are given this added layer of protection of anonymity. Primark hopes to use the learnings to inform developments within other similar initiatives available to workers elsewhere in its supply chain.

- **Hamary Awaz, Pakistan, and Ungla Kural, India.** In June 2023 Primark signed two new partnerships to establish independent industry-wide grievance mechanisms in Pakistan and India, named Hamary Awaz and Ungla Kural respectively. Both initiatives include partnerships with local NGOs trained as hotline operators and factory liaison staff, an approach used successfully in Amader Kotha in building trust among workers.
- **Worker Support Center, Turkey.** The Worker Support Center is a grievance mechanism operating in four languages, run by Turkish NGO, MUDEM. Primark joined the project in 2020 and subsequently introduced it to more than 20 factories in its supply chain. The project was originally designed to focus on refugee workers in the garment industry and was only promoted in factories that were employing refugees. Primark is planning further significant scale-up across its supply chain in 2024. Learning from the support to Amader Kotha in Bangladesh, the Primark team in Turkey will work alongside staff from MUDEM to visit factories covered by the hotline to raise awareness and engage management and workers.

| | | | | |
|--------------|-------------------------------|-----------------------|---------------------------|---------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Measuring progress

Our businesses develop appropriate measurements for their supply chains and operations and monitor their progress and performance against these as they deem appropriate. Several of our businesses have internal key performance indicators (KPIs) in place in relation to human rights risks, while some report on these through their modern slavery statements.

Examples from our businesses of their key performance indicators and areas monitored include:

- internal staff and supplier training, and awareness of forced and trafficked labour issues;
- policies relating to forced and trafficked labour;
- actions taken as part of collaborative initiatives to address modern slavery;
- Supplier Code of Conduct non-compliances relating to employment being freely chosen and related indicators such as forced overtime;
- registered grievances relating to any form of forced labour; and
- investigative and remedial actions taken in response to any risks of forced labour.

Primark tracks and monitors the following indicators to assess the effectiveness of its actions to address modern slavery:

- factory non-compliances against the Primark Supplier Code of Conduct and corrective actions taken;
- factories that participate in external independent grievance mechanisms, and the number of workers in those factories; and
- recorded grievances received and resolved, both across all issues and those related to modern slavery.

All Primark's programmes and projects are reviewed through a new Monitoring, Learning and Evaluation (MLE) framework. It has also started working with social impact measurement experts, Tandem and 60 Decibels, to strengthen its measurement approach and to understand the effectiveness of its programmes in line with international best practice.

| | | | | |
|--------------|-------------------------------|-----------------------|--------------------|----------------------|
| Introduction | Governance and accountability | Policy and management | Identifying harms | Training |
| | Addressing risks | Grievance mechanisms | Measuring progress | Communicating |

Communicating

Communicating progress is important if we are to have an impact in addressing modern slavery. ABF welcomes the launch of the UK Government's Modern Slavery Statement Registry to provide an accessible repository for company statements.

ABF as a Group reports on its progress and performance on human rights risk through its annual Responsibility Report and corporate website. We share our learnings and communicate on our progress regularly as a Group to our investors and shareholders and respond to requests from stakeholders on specific risks within our businesses' operations and supply chains.

Regulation governing corporate ESG reporting is increasing, and we welcome the introduction of increased measures for company reporting, for example under the UK Modern Slavery Act and, at an EU level, through the EU Corporate Sustainability Reporting Directive (CSRD).

Several businesses within the Group also publish their own separate or supplemental modern slavery statements, which can be found via the ABF website and/or on the relevant businesses' websites.



Paul Lister

Director of Legal Services and Company Secretary

For and on behalf of the Board of Associated British Foods plc

This statement was approved by the Board of Associated British Foods plc on 1 November 2023.

This statement is published in accordance with the UK Modern Slavery Act 2015 and covers Associated British Foods plc and its Group companies.

You can review our previous statements on the ABF website. In addition, several businesses within the Group have produced statements that provide further relevant detail in respect of their own operations; these are also available via the ABF website.

You can also learn more about our activities and performance in our 2023 Responsibility Report.