LADORIA GROUP

LDH (LA DORIA) LTD

MODERN SLAVERY STATEMENT

2025/2026

30 June, 2026

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INTRODUCTION

LDH (LA DORIA) LTD

Modern slavery remains a pervasive global issue, affecting millions of vulnerable individuals across the world. At LDH (La Doria) Ltd, we are firmly committed to upholding the human rights and dignity of all workers throughout our operations and supply chains. We recognise our responsibility to take meaningful action in the fight against modern slavery and human trafficking.

This document represents LDH's tenth annual Modern Slavery Statement, prepared in accordance with the UK Modern Slavery Act 2015. It covers the financial year ending 31 December 2025 and outlines the steps we have taken to prevent, identify, and address risks of modern slavery within our business and across our supply networks.

This statement was created to meet section 54(1) of the UK Modern Slavery Act 2015 for the financial year ending 31 December 2025 and was approved by LDH's management body on 30/06/2026.

Key Progress 2025- 26

Conducted human rights maturity assessment

- Delivered a comprehensive, end-to-end human rights maturity assessment across internal operations and the supply chain, independently reviewed by external experts, resulting in a prioritised short-, medium-, and long-term action plan.

Executed Phase 1 of the Raw Material Integrity Risk Assessment

- Successfully delivered Phase 1 of the Integrity Risk Assessment, including supplier risk assessments, on-site control reviews, collaborative action planning, and prioritisation for Phase 2 in 2026.

Focused HRDD data collection on tomato supply chains

- Applied a risk-based approach to human rights due diligence by focusing HRDD data collection on tomato supply chains with known farm-level labour risks, particularly in Italy and China.

Human rights due diligence framework

- Developed a Human Rights Due Diligence Framework and a resilience risk assessment model for countries and commodities used by suppliers, which now informs LDH contingency planning.

MESSAGE FROM OUR CEO

As CEO of LDH (La Doria) Ltd, I am proud to present our tenth annual Modern Slavery Statement. At LDH, we believe that upholding human rights and eradicating modern slavery are fundamental responsibilities that underpin our business and supply chains.

Over the past year, we have made significant progress, including conducting a comprehensive human rights maturity assessment, expanding our due diligence to higher-risk supply chains, and achieving a 42.9% reduction in critical non-compliances at our Tier 1 sites.

Our commitment extends beyond compliance. We have deepened our engagement with suppliers, enhanced transparency through advanced supply chain mapping, and empowered workers by listening to their voices and acting on their feedback. We are also proud of our collaborative efforts with partners such as Oxfam and the Food Network for Ethical Trade, which have strengthened our approach to gender equality and responsible sourcing.

Looking ahead, we remain dedicated to continuous improvement. We will further expand our risk assessments, strengthen remediation procedures, and ensure that every worker in our supply chain continues to be treated with dignity and respect. I would like to thank our employees, suppliers, and partners for their ongoing commitment to these shared values. Together, we will continue to drive meaningful change and set new standards for ethical business conduct.

Enzo Lamberti
Chief Executive Officer
June 2026

OUR OPERATIONS

LDH (La Doria) Ltd is a leading Own Label supplier of ambient grocery products to major UK supermarkets. With over 60 years of experience, we specialise in sourcing a wide range of high-quality, competitively priced food products from trusted suppliers across the globe. Our product portfolio includes canned vegetables, pasta sauces, canned fish, fruit, and other ambient goods that are staples in British households.

Our operations span the entire supply chain, from global sourcing and procurement to logistics and distribution. We work closely with strategic partners to ensure resilient, agile, and ethical supply chains tailored to the specific needs of each product. Our headquarters and fully automated distribution centre are based in Sproughton, Suffolk, supporting efficient and transparent delivery to our retail partners.

We are committed to maintaining the highest standards of integrity, transparency, and accountability in all aspects of our business. All suppliers are rigorously vetted and regularly audited to ensure compliance with recognised industry standards and codes of practice. This includes a strong emphasis on ethical sourcing, food safety, and legal compliance.

As part of our ongoing commitment to ethical trade, LDH is an active member of the Food Network for Ethical Trade (FNET) and other global initiatives focused on sustainability and human rights. These partnerships reinforce our dedication to identifying and mitigating the risks of modern slavery and human trafficking within our operations and extended supply chains.

24 Countries

68 Tier 1 Suppliers

1000+ Product Lines

121 LDH Employees

32,000+ Tier 1 Employees

18000+ Tier 1 Female Employees

High-Performance Logistics Partner

Leading Automation Partner

Trusted Transportation Partner

GOVERNANCE

LDH (LA DORIA) LTD

Governance Body

At LDH (La Doria) Ltd, our governance framework ensures strong oversight and accountability in addressing modern slavery and human rights risks across our operations and supply chains.

The Responsible Sourcing Manager leads the development and execution of our responsible sourcing strategy, including initiatives focused on modern slavery, human trafficking, and broader human rights due diligence. This role is central to embedding ethical practices throughout our procurement processes and supplier relationships. LDH operates in alignment with the strategic direction and guidelines established by its parent company, La Doria S.p.A., ensuring consistency and coherence across the Group.

Oversight is provided by the Technical Director, a member of the directors team, who maintains close involvement with the responsible sourcing programme. The Technical Director reports quarterly to the full Board, ensuring that all directors are informed of progress, challenges, and emerging risks.

There is ongoing collaboration between the Responsible Sourcing Manager and the Procurement team, supported by clear internal escalation pathways. Where significant concerns arise, these are escalated to the Director and CEO level, enabling swift and effective decision-making.

For high-risk or serious issues, escalation extends to Group-level oversight, which includes the Group Board and Risk Committee. This structure ensures that critical matters receive appropriate scrutiny and that our response is aligned with our corporate values and legal obligations.

Governance Structure

At LDH (La Doria) Ltd, our governance framework is underpinned by a strong commitment to upholding human rights and ethical business practices across our operations and supply chains. We have implemented a comprehensive Human Rights Policy and a Supplier Ethical Code of Conduct, which is distributed to all suppliers with the expectation that it is fully adopted and embedded throughout their supply chains.

To ensure these standards are upheld, we have developed a robust Human Rights Due Diligence Framework. This framework enables us to monitor the effectiveness of our policies and identify potential risks through a range of tools, including:

- Site Risk Assessments
- Raw Material Integrity Risk Assessments
- Salient Human Rights Risk Assessments
- Supply Chain Mapping and Transparency Data Requirements

These assessments are conducted in collaboration with our suppliers, fostering engagement and shared responsibility. Through this collaboration, we identify gaps, evaluate existing controls, and address high-risk areas with targeted action plans.

To strengthen our capabilities and drive continuous improvement, we leverage our memberships with organisations such as the Food Network for Ethical Trade (FNET) and the Sea Alliance. We have also partnered on initiatives with &Wider and the Ethical Trading Initiative (ETI) to gain deeper insights into worker-level issues. These collaborations support the development of more effective controls and remediation strategies, ensuring that our approach remains responsive and grounded in real-world conditions.

LDH (LA DORIA) LTD

ETHICAL & LEGAL COMPLIANCE

SMETA audit: All Tier 1 suppliers & extented to Tier 2
ILO Standard Requirements (extended supplier responsibility across supply chain)
Modern Slavery Statement

POLICIES & FRAMEWORKS

Human Rights Policy
Supplier Ethical Code of Conduct
Human Right Due Diligence Framework

MONITORING & REPORTING

Modern Slavery Statement
Site Risk Assessment
Integrity Risk Assessement
Salient Human Rights Risk Assessment
Supply Chain Transparency

OUR SUPPLY CHAINS

Communication & Supplier Engagement

At LDH (La Doria) Ltd, we recognise that effective communication and collaboration with our suppliers and stakeholders are essential to advancing our human rights due diligence efforts. We actively engage our Tier 1 suppliers by sharing our internal and customer policies, and updates on relevant legislation to ensure alignment with our ethical and legal expectations. We conduct regular supplier visits not only to strengthen communication and enhance data collection, but also to validate the accuracy of the information provided and ensure that our standards are being upheld on the ground.

All Tier 1 suppliers are required to complete the Sedex Self-Assessment Questionnaire (SAQ), which provides a baseline understanding of their practices. In addition, we conduct our own internal site risk assessment, which evaluates 30 key data points, including indicators related to human rights risks and concerns. This assessment helps us identify high-risk sites and develop collaborative action plans focused on remediation and continuous improvement.

Supply chain mapping is a critical component of our engagement strategy. It enables us to gain visibility into the structure of each raw material supply chain and the stakeholders involved. This process supports a deeper understanding of potential risks and informs our approach to responsible sourcing.

In 2025, we expanded our due diligence responsibilities beyond Tier 1. We now require suppliers to demonstrate how they monitor and manage human rights risks throughout their own supply chains. This includes providing evidence of their risk identification processes, communication protocols, and remediation strategies. This enhanced approach allows us to gain greater transparency and identify gaps or vulnerabilities that may exist further down the supply chain.

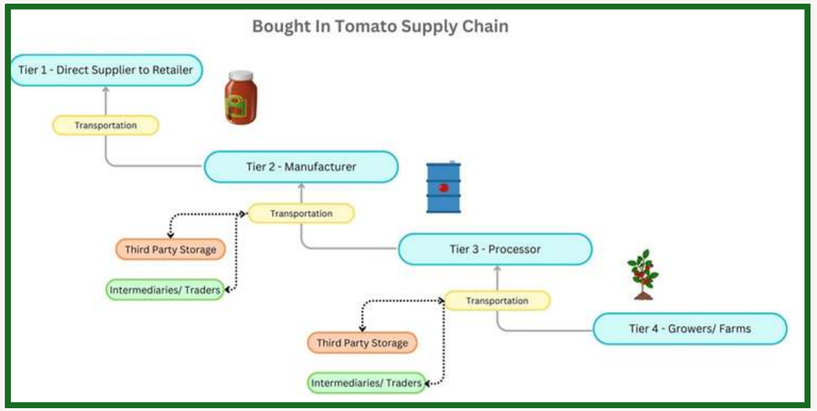
Through these efforts, we aim to foster a culture of shared responsibility and continuous improvement, ensuring that human rights are respected and upheld at every level of our supply network.

Communication
LDH Policies
Customer Policies
Legislation Updates
Site Risk Assessment/ Sedex SAQ
Supplier Visits
Corrective Action Plan
Supply Chain Mapping
Extended Supplier Due Diligence Responsibility

Case Study 1: Deepening Due Diligence – LDH's Two-Phase Engagement with La Doria S.p.A.

At LDH, our commitment to human rights doesn't stop at the first tier of our supply chain. We understand that the most significant risks often lie further upstream, where visibility is limited, and the voices of workers can be harder to hear. That's why, as part of our ongoing partnership with La Doria S.p.A., we saw an opportunity to deepen our understanding of the due diligence processes in place, ensuring that human rights were being respected not just in principle, but in practice.

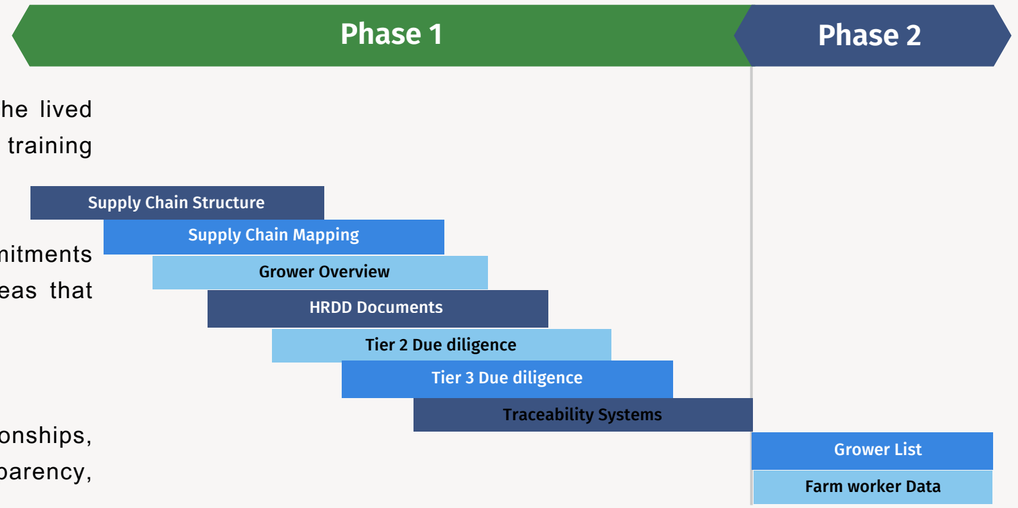
We launched a two-phase engagement process designed to bring clarity, accountability, and improvement to every level of the supply chain.



Phase 1: Mapping the Landscape

Our first step was to understand the full picture. We asked La Doria to provide detailed upstream data—everything from the locations of farms and harvesting methods to the composition of the workforce. We also requested documentation on human rights policies, ethical codes of conduct, and third-party audit reports, along with insights into how these standards were communicated and enforced across the supply chain.

La Doria responded with a collaborative approach, gathering information through site visits, remote audits, supplier questionnaires, and document reviews. This phase gave us a clearer view of the supply chain's structure and maturity, helping us identify both strengths and potential gaps in human rights practices.



Phase 2: Listening at the Ground Level

With a solid foundation in place, we moved to the second phase: farm-level due diligence. Here, the focus shifted to the lived experiences of workers. We gathered data on wages, working hours, recruitment practices, employment terms, and the training provided to workers about their rights and responsibilities.

This deeper engagement allowed us to go beyond policy and paperwork. We began to see how human rights commitments translated into day-to-day realities—and where they didn't. We identified good practices worth sharing, as well as areas that needed targeted support and remediation.

What We Learned

This case study reinforced a powerful lesson: meaningful due diligence requires more than checklists. It requires relationships, trust, and a willingness to ask difficult questions. By working closely with La Doria, we were able to enhance transparency, strengthen accountability, and lay the groundwork for continuous improvement across a complex agricultural supply chain.

Our journey with La Doria is ongoing, but it stands as a model for how proactive engagement, rooted in shared values can drive real progress in protecting human rights beyond Tier 1.

LDH PROCUREMENT MAP & RISK REVIEW

LADORIA GROUP
LDH (LA DORIA) LTD

Tier 1 Country List

Belgium	China	Ecuador	France	Italy	Ghana
Greece	Hungary	India	Indonesia	Ireland	Malta
Morocco	Netherlands		Philippines	Portugal	Seychelles
South Africa	Spain	Turkey	Thailand	UK	USA

Salient Risk Priority Themes

Regular Employment	Health & Safety
Forced Labour/ Freedom of Association	Low Wages/ Working Hours

(Determined by SEDEX Radar Inherent Risk Score)

High Risk Raw Materials

Tuna & Sardines

Tomato

Herbs & Spices

Cocoa

High Risk Countries

Ecuador
Morocco
Thailand
Italy
Phillipines
Italy
India
China
West Africa
Turkey

(Determined by LDH salient risk assessment)

POLICIES IN RELATION TO MODERN SLAVERY

LDH (La Doria) Ltd is firmly committed to respecting and promoting human rights across all areas of our business and supply chains. Our approach is guided by the United Nations Guiding Principles on Business and Human Rights (2011), the Universal Declaration of Human Rights, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998).

In alignment with these international standards, we have established a comprehensive set of policies and controls designed to identify, prevent, and address the risks of modern slavery and human trafficking.

Our journey began in 2018 with the development of our Responsible Sourcing Strategy, which included the creation of a tailored Responsible Sourcing Site Risk Assessment Framework. This framework enables us to assess and manage risks across our global manufacturing suppliers in a structured and consistent manner.

In early 2021, we strengthened our due diligence processes by launching a company-wide Human Rights Policy and a Supplier Code of Conduct, both of which explicitly address modern slavery and human trafficking. These documents were developed in collaboration with an external human rights consultant and with input from key internal stakeholders to ensure they reflect both global best practices and the realities of our operations.

To maintain relevance and effectiveness, these policies were reviewed and updated in 2022. They continue to serve as the foundation for our ethical sourcing practices and are communicated to all suppliers as part of our onboarding and ongoing engagement processes. Both the Human Rights Policy and the Supplier Code of Conduct are aligned with the principles set out in the La Doria Group Code of Ethics.

Human Rights Policy

Supplier Code of Conduct

Seafood Sourcing Policy

Human Resource Policy

Supplier Code of Conduct

LDH (La Doria) Ltd introduced its Supplier Code of Conduct in early 2021 as a cornerstone of our commitment to ethical and responsible sourcing. This Code outlines our expectations for all suppliers—including labour providers, service providers, contractors, and sub-contractors—regarding social, environmental, and human rights practices.

Suppliers are expected to comply with all applicable laws and regulations in the countries where they operate. However, where our Code of Conduct sets a higher standard than local legal requirements, we expect suppliers to meet the standards outlined in the Code.

Key expectations include:

- Upholding internationally recognised human rights
- Prohibiting all forms of forced, bonded, or child labour
- Ensuring safe and fair working conditions
- Promoting environmental stewardship and responsible resource use

Suppliers are also responsible for cascading these principles throughout their own supply chains. We expect them to communicate the contents of this Code to their workers and to their own suppliers, ensuring that ethical standards are understood, implemented, and monitored at every level.
This Code is a living document, reviewed regularly to reflect evolving best practices and stakeholder expectations. It forms a critical part of our supplier onboarding, engagement, and monitoring processes.

Human Rights Policy

Our Human Rights Policy sets out the minimum standards that LDH (La Doria) Ltd upholds and expects all suppliers, contractors, and business partners to follow in order to protect and promote human rights in the workplace. The policy applies across all LDH operations and throughout our global supply chains.

Grounded in the principles of the Ethical Trading Initiative (ETI) Base Code, the policy reflects our commitment to fair labour practices, safe working conditions, and the prevention of exploitation, including modern slavery and human trafficking. Our Human Rights Policy follows the guidelines defined at Group level, ensuring consistency and coherence across the organisation and alignment with the Group's overall approach to human rights

LDH has implemented a range of policies and procedures to identify, prevent, and mitigate adverse human rights impacts. These include:

- Comprehensive risk assessments
- Supplier due diligence and onboarding processes
- Ongoing monitoring and performance reviews
- Remediation planning where risks or violations are identified

The Human Rights Policy is embedded into our operational and sourcing practices and is reviewed regularly to ensure it remains aligned with evolving legal requirements and stakeholder expectations.

Seafood Sourcing Policy

At LDH (La Doria) Ltd, we are committed to upholding human rights and promoting social accountability across our seafood supply chains. Our Sustainable Seafood Policy incorporates international labour standards, with a particular focus on the rights and welfare of workers in fisheries.

We require our seafood supply chains to align with the principles of ILO Convention 188, which ensures that all fishers are entitled to:

- Written terms and conditions of employment
- Decent accommodation and food
- Access to medical care
- Regulated working hours and rest periods
- Repatriation rights
- Social protection
- Health and safety on board vessels

To support these commitments, LDH conducts supply chain mapping with a focus on identifying and assessing human rights risks within high-risk segments of the seafood value chain, including fisheries, vessels, and processing facilities. This due diligence process enhances transparency and accountability, helping us to identify potential violations and work collaboratively with suppliers to implement corrective actions.

Through this approach, we aim to ensure that all individuals involved in our seafood supply chains are treated with dignity, fairness, and respect.

Human Resource Policy

LDH (La Doria) Ltd is committed to ensuring that all employees are treated with fairness, dignity, and respect. Our Employee Handbook outlines clear standards and procedures that support the protection of human rights within our workplace.

Key provisions include:

- Fair and Transparent Recruitment: All recruitment practices are designed to be open, equitable, and free from discrimination. Employees are provided with clear, understandable terms and conditions of employment from the outset.
- Access to Grievance Mechanisms: Employees are educated on how to raise concerns through formal grievance procedures and whistle-blowing channels. These mechanisms explicitly cover issues related to modern slavery and human trafficking.
- Protection Against Retaliation: We ensure that all employees can report concerns safely and confidentially, without fear of retaliation. This reinforces our commitment to creating a safe and supportive working environment.
- Legal Compliance and Ethical Standards: The handbook affirms our adherence to all applicable local and national labour laws, reinforcing our broader commitment to ethical business conduct and the protection of human dignity.

These measures are part of our broader human rights framework and are regularly reviewed to ensure they remain effective and aligned with best practices.

Policy	Overview	Communication & Implementation
Supplier Code of Conduct	LDH requirements of suppliers with respect to social and environmental practices across the supply chain	The document is distributed to all Tier 1 suppliers, who are expected to review its contents, integrate its principles into their operations, and cascade its requirements throughout their own supply chains. We ask suppliers to provide regular updates on: • Actions taken to align with the Code • Improvement plans and progress • Any challenges encountered in meeting specific requirements This ongoing dialogue helps us understand where support may be needed and fosters a culture of continuous improvement.
Human Rights Policy	LDH principles & standards aligned with ETI Base Code for internal & external stakeholder fulfilment	The policy is sent to all Tier 1 suppliers who are required to implement and cooperate with the following due diligence requirements: • Third-party social audits • Corrective action plan & non-compliance closure progress (dialogue) • Supplier Audit Questionnaires (SEDEX) • Annual risk assessment (LDH questionnaire & SEDEX) • High-risk sites action plans (Collaborative dialogue, roadmap & timeline on delivering continuous improvement)
LDH Seafood Sourcing Policy	Includes commitment to social accountability in fisheries and along the supply chain	As part of this commitment, Tier 1 suppliers are expected to support and participate in the following key activities: • Social Risk Assessments: Conducting assessments of fisheries and processors using recognised tools such as the Sea Alliance Fishery Risk Tool, the Global Slavery Index, and the Sedex Flag State Risk Rating to identify and evaluate human rights risks. • Supply Chain Mapping: Collecting and sharing detailed supply chain data to enhance transparency and traceability • Vessel Crew Data Collection: Gathering information on crew demographics, working conditions, and employment practices to assess risks of exploitation at sea. • Advocacy and Collaboration • Stakeholder Engagement: Collaborating with relevant NGOs, trade unions, and subject matter experts
Human Resource Policy	Includes LDH policies on responsible recruitment, grievance mechanisms & whistle-blowing	At LDH (La Doria) Ltd, we ensure that all employees are fully informed of their rights and responsibilities through the structured communication and implementation of our Employee Handbook. The handbook is: • Distributed to all staff during onboarding, ensuring that every employee begins their role with a clear understanding of our expectations and values. • Permanently accessible via the LDH staff portal, allowing employees to review policies at any time and stay informed of any updates.

RISK ASSESSMENT, PREVENTION & MITIGATION

While we have continued to deliver our periodic site ethical audits, in 2025-26 we set out to extend our human rights programme beyond compliance.

INDICATOR	ACTIVITY	OUTCOME
Extended Site Risk Assessment	Expanded the scope of the site-level human rights risk assessment to include both quantitative and qualitative data inputs, enhancing the depth and accuracy of risk identification.	• Implemented periodic monitoring of site performance • Developed action plans for continuous improvement • Fostered collaborative communication with internal and external stakeholders • Strengthened long-term viability of ethical partnerships
Integrity Risk Assessment	Developed a raw material integrity risk assessment to identify human rights risks across all product ingredients, from country of origin through to production.	• To identify specific risks associated with individual raw materials and their points of occurrence within the supply chain • Collaborate with suppliers to establish, verify, and strengthen existing controls • Develop and implemented remediation plans where necessary
Gender	As part of our commitment to promoting gender equality within our supply chains, LDH engaged Oxfam to provide tailored gender advisory services.	• Developed a Gender Strategy Roadmap for LDH and supplier sites • Collected and analysed data to assess the current maturity level of gender-related initiatives at supplier sites. • Identified existing processes to group suppliers by common themes to address gaps • Developed targeted improvement strategies
Worker Voice Project	A three-year collaborative initiative using worker-focused surveys in Italian tomato fields to identify and understand worker issues, including patterns related to location and demographics.	• Produced reports highlighting worker-raised issues • Enabled targeted remediation and improvement initiatives • Increased visibility and accountability for ongoing improvements

Case Study 2: Advancing Gender Equality in LDH's Supply Chains

Our Belief
At LDH, we've always believed that ethical sourcing is about more than compliance, it's about people. And when it comes to people, gender equality is a cornerstone of dignity and fairness in the workplace. But belief alone isn't enough. We knew we needed to take meaningful action.

Partnering for Progress
To strengthen our approach, we partnered with Oxfam, a global leader in social justice, to help us better understand and improve gender inclusion across our supply chains. What followed was a transformative journey, one that challenged us to reflect, plan, and act with purpose.

Collaborative Learning
Over the course of four in-depth sessions, Oxfam's gender advisory team worked closely with us. They:

- Assessed our current position
- Helped us define our goals
- Provided expert guidance on how to achieve them

These weren't just workshops—they were strategic working sessions that pushed us to think critically and build a practical path forward.

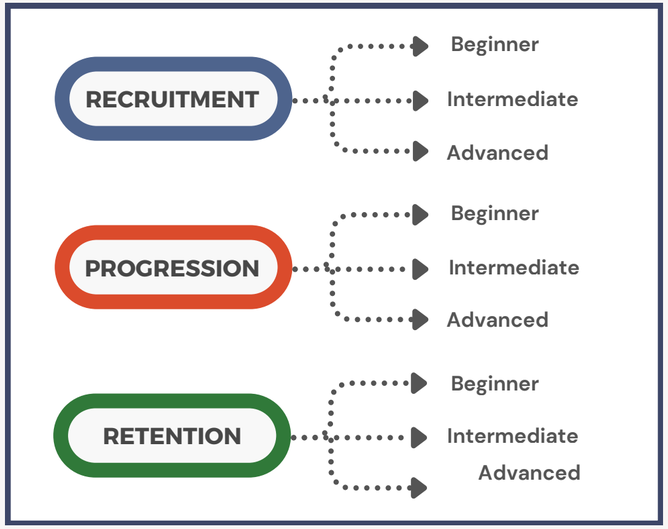
Creating the Gender Roadmap
One of the key outcomes was the development of a two-part Gender Roadmap:

- Internal Roadmap: Focused on strengthening gender equality within LDH's own operations.
- External Roadmap: Designed to support our suppliers on their gender inclusion journeys.

Turning Insight into Action
This data became a powerful tool. It allowed us to:

- Move from broad conversations to targeted engagement
- Identify specific areas for improvement
- Set realistic, achievable goals with suppliers
- Foster open dialogue about challenges and opportunities

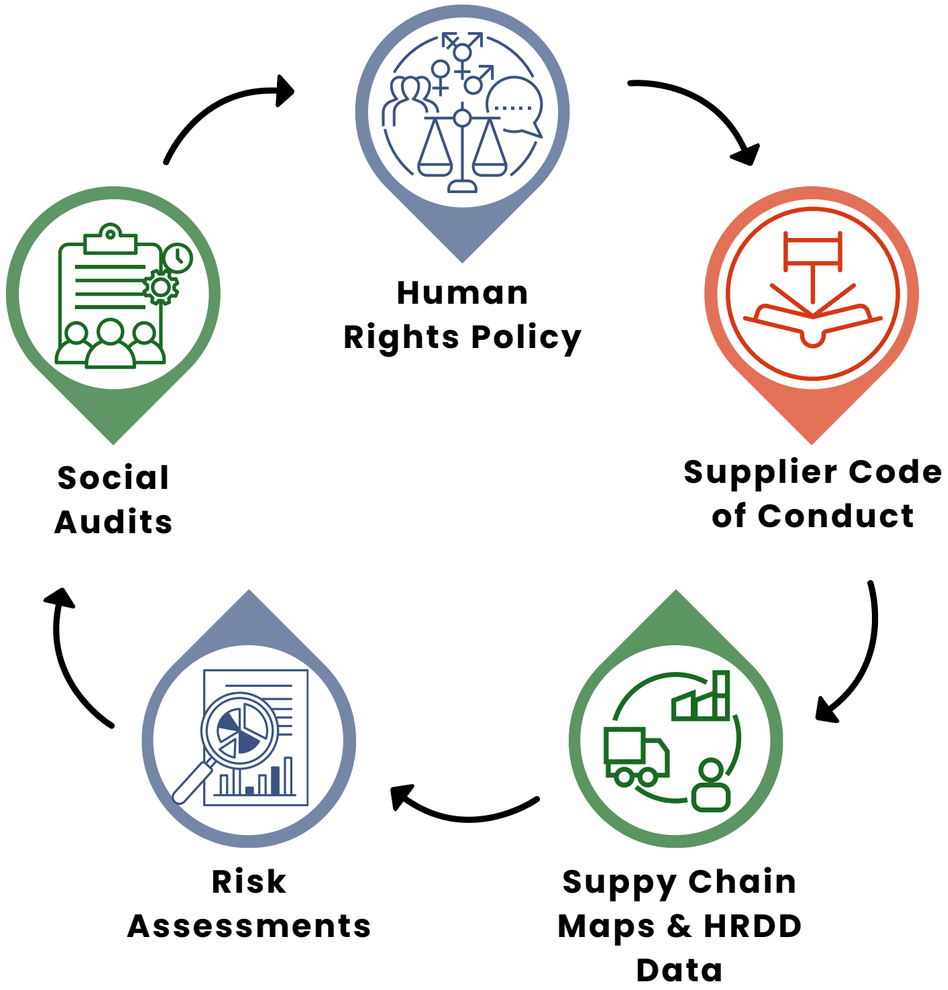
Supplier Engagement and Assessment
With Oxfam's Gender Checklist in hand, we engaged our suppliers to assess their practices across three key areas: Recruitment, Progression, Retention. The responses gave us a clear picture of where each supplier stood—who was leading, who was emerging, and where the biggest gaps existed.



Looking Ahead
This is just the beginning. We continue to:

- Support suppliers in setting and pursuing gender equality targets
- Review and refine our internal roadmap
- Track progress and remain committed to continuous improvement

DUE DILIGENCE PROCESSES



Site Approval and Ethical Oversight

LDH has been a committed member of Sedex (Supplier Ethical Data Exchange) since 2007. We require all our suppliers to maintain Sedex membership and complete the Sedex Self-Assessment Questionnaire (SAQ) every six months. The SAQ serves as a foundational tool, helping us gain insight into working conditions, recruitment practices, labour management, policies, and workforce demographics at the site level.

To deepen our understanding of potential risks, we are continuously expanding our supply chain mapping efforts tracing products back to their source and gathering detailed information on farm workers and vessel crews.

Third-party audits, including assessments against the ETI Base Code at Tier 1 and GRASP evaluations at the grower level, play a key role in identifying human rights risks and potential violations. However, audits are just one component of our broader, evolving strategy to combat modern slavery.

We believe that open, transparent relationships with our suppliers are essential for driving meaningful improvements in working conditions. Our supplier approval process is designed to foster long-term partnerships, supported by regular communication, both remote and on-site. These assessments incorporate a range of technical and ethical performance indicators, including risk assessments, corrective action plans, supply chain mapping, and social audits.

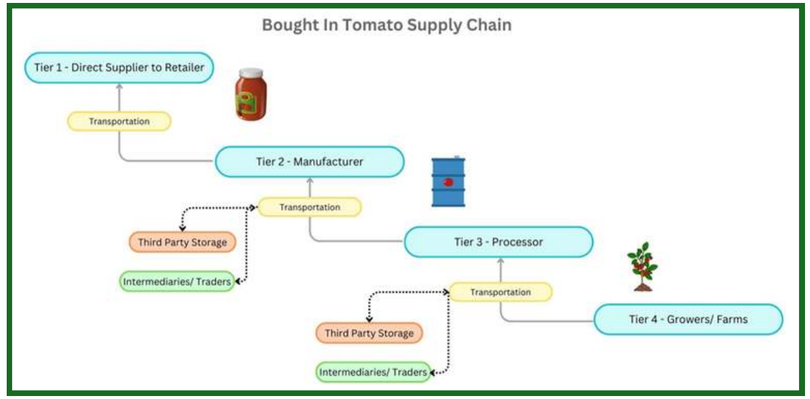
Supply Chain Mapping and Risk Identification

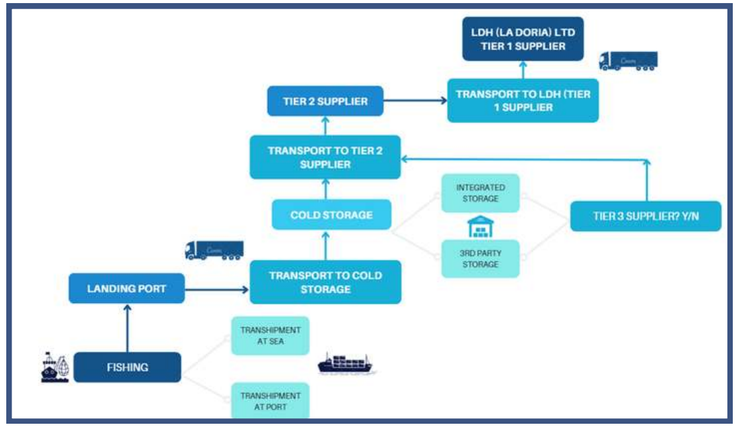
We acknowledge that the risk of modern slavery exists within global supply chains, and we are committed to taking proactive, practical steps to identify and address these risks. As part of our responsible sourcing strategy, we have developed and implemented tools to enhance transparency and traceability across our supply network.

In early 2024, we introduced an enhanced supply chain mapping tool that includes expanded data requirements related to human rights due diligence, covering policies, controls, implementation, and monitoring across the entire supply chain. This tool is being rolled out using a supplier prioritisation approach, focusing first on high-risk suppliers and supply chains identified through site-level assessments, integrity checks, and salient risk evaluations. Full implementation across all suppliers is targeted for completion by the end of 2026.

The updated template captures more detailed information at the farm and vessel level, enabling us to assess risks beyond Tier 1 suppliers and gain deeper visibility into the origins of our products. These enhancements will strengthen our ability to identify potential vulnerabilities and take informed, targeted action to mitigate the risks of modern slavery and labour exploitation.

Our supply chain mapping efforts are a cornerstone of our broader due diligence framework, supporting our commitment to building ethical, transparent, and resilient supply chains.





Risk Assessments

Biennially our Tier 1 suppliers are evaluated using LDH's Responsible Sourcing Risk Assessment Framework. In 2024, we enhanced our methodology to incorporate a broader range of data, drawing on 30 quantitative and qualitative indicators. These include insights from SMETA audit reports, Sedex Self-Assessment Questionnaires (SAQs), Sedex inherent risk scores, and site-specific information on the capacity and capability to manage ethical issues, gathered through tailored questionnaires.

Each supplier is scored against these criteria, enabling us to build a more comprehensive understanding of modern slavery and human rights risks at the supplier level. The resulting risk ratings help us prioritise engagement and inform the development of annual supplier action plans, which are created collaboratively through ongoing dialogue.

In 2024, we also developed a new Integrity Risk Assessment to identify human rights risks across raw materials and their associated supply chains—extending our visibility beyond Tier 1. This tool is currently being piloted with our UK mackerel supplier, whose products include high-risk raw materials such as mackerel and sardines, alongside a diverse range of globally sourced ingredients like oil, tomato purée, and herbs and spices.

This pilot provides a valuable opportunity to test the Integrity Risk Assessment in a complex supply chain environment, helping us identify potential gaps and refine the tool. Responsibility for implementing remediation actions lies with the supplier, supported by continuous collaboration, action planning, and feedback loops to ensure the effectiveness and long-term success of the assessment process.

Social Audits

At site level we require a SMETA (Sedex Members Ethical Trade Audit) audits or equivalent to be conducted by independent third-party auditors based on risk levels, often guided by customer requirements and policies. These audits offer verified insights into working conditions and provide a platform for worker feedback, helping to identify both strengths and areas for improvement.

The resulting SMETA reports, published on the Sedex platform, include detailed findings and a Corrective Action Plan (CAP) to address any non-compliance with the Ethical Trading Initiative (ETI) Base Code. Compliance with the ETI Base Code is widely recognised as a leading benchmark for ethical labour practices at the factory level, covering critical areas such as recruitment fees, labour agency practices, and grievance mechanisms.

At the agricultural level, we are seeing a growing number of our growers adopt Global G.A.P. GRASP (Risk Assessment on Social Practice). This tool assesses social risks on farms, with a particular focus on issues such as child labour and forced labour, helping us extend ethical oversight beyond manufacturing sites and into primary production.

HUMAN RIGHTS DUE DILIGENCE ROADMAP

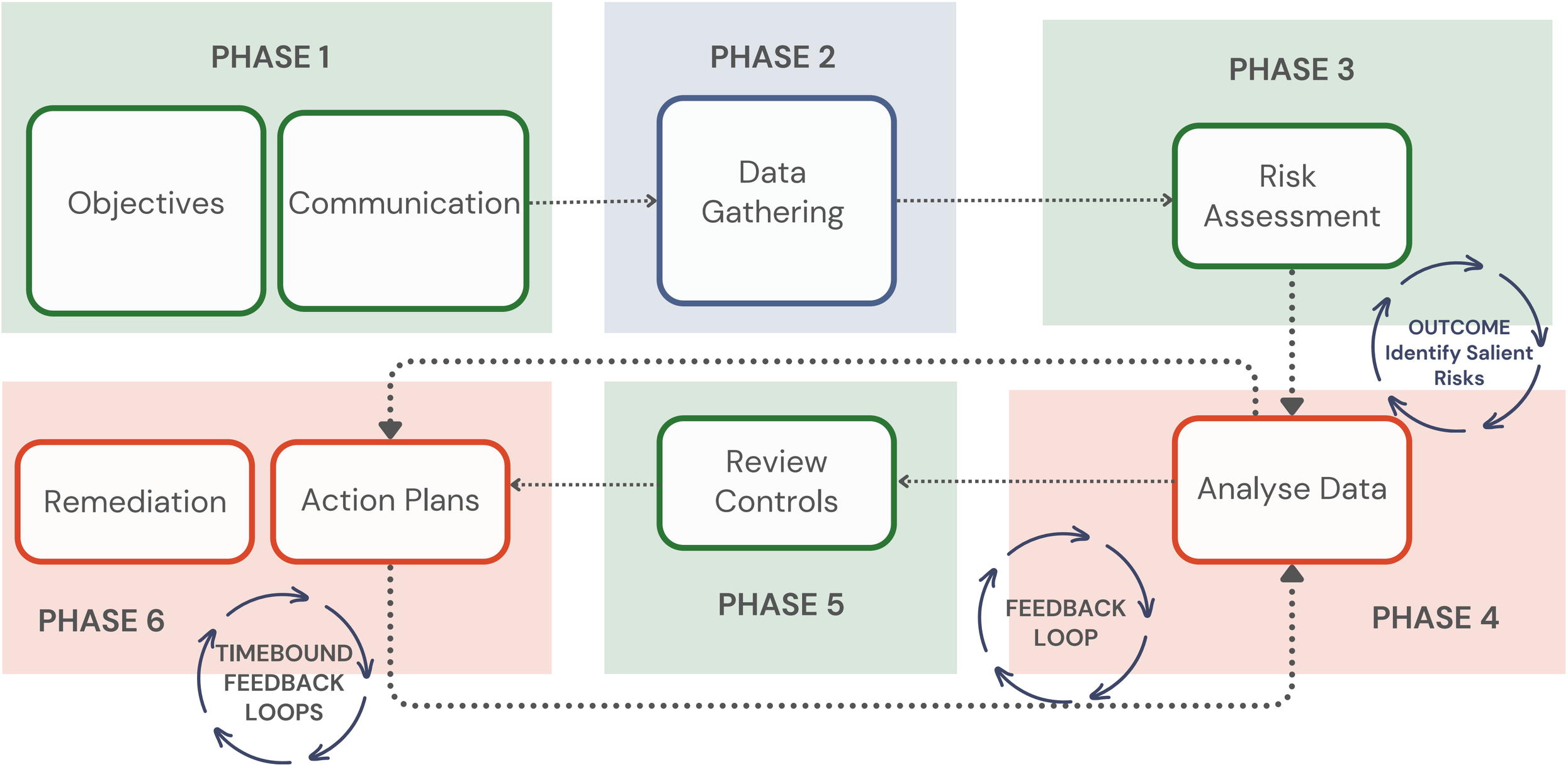
In 2024, we began developing a comprehensive Human Rights Due Diligence (HRDD) Roadmap to strengthen our ability to identify, assess, and address human rights risks across all tiers of our supply chain. This roadmap is designed to provide a structured, transparent, and proactive approach to due diligence, aligned with international standards and best practices.

The roadmap follows a six-phase framework, each building on the previous to ensure a continuous and collaborative process:

1. **Objectives and Communication** – Establishing clear goals for human rights due diligence and outlining internal and external communication strategies to ensure alignment and transparency across stakeholders.
2. **Data Gathering** – Collecting detailed information from suppliers and other sources, including site-level data, raw material origins, and labour practices.
3. **Risk Assessment** – Evaluating both inherent and actual risks using a combination of internal tools, supplier disclosures, and third-party data.
4. **Analysis** - We analyse the collected data to identify patterns, trends, and systemic risks, helping us prioritise where intervention is most needed.
5. **Reviews and Controls** – We implement oversight mechanisms and internal controls to monitor the effectiveness of our due diligence processes and ensure continuous improvement.
6. **Action Plans and Remediation** – Collaborating with suppliers to implement corrective actions, address identified risks, and ensure appropriate remediation where harm has occurred.

This roadmap is designed to be dynamic and adaptable, with built-in feedback loops and continuous engagement to ensure it remains effective as our supply chains evolve. It supports our long-term commitment to ethical sourcing and reinforces our responsibility to respect and uphold human rights at every level of our operations.

HUMAN RIGHTS DUE DILIGENCE ROADMAP



KEY PROGRESS INDICATORS

To date, LDH has primarily relied on the Sedex platform to assess and monitor supplier ethical standards through the use of Self-Assessment Questionnaires (SAQs) and SMETA audits. These audits provide a comprehensive evaluation of supplier compliance with national labour laws and the Ethical Trading Initiative (ETI) Base Code.

Building on this foundation, we have implemented a Responsible Sourcing Assessment Framework to further evaluate supplier performance. This framework enables us to assess suppliers against a set of defined risk factors and performance indicators, allowing for a more targeted and proactive approach to identifying and addressing potential modern slavery risks within our supply chain.

SEDEX registration

SAQ completion

Reduce critical NCs

Audit NC closure within timescale

Supplier Engagement and Continuous Improvement

We recognise the importance of developing improvement plans collaboratively with all our suppliers. However, we prioritise high-risk sites for immediate action planning, followed by medium-risk sites. Our approach is grounded in ongoing, in-depth dialogue with suppliers to address forced labour risks and identify effective, sustainable solutions.

Over the next three years, our key targets include reducing all high- and medium-risk suppliers to medium or low-risk status and enhancing visibility across the lower tiers of our supply chain. We aim to achieve this through the implementation of tailored action plans, continuous stakeholder engagement, and close monitoring of supplier audit outcomes.

We also recognise that enabling all workers in our supply chains to raise grievances safely and effectively is critical. This is actively monitored through our risk assessment processes, and we are working closely with suppliers to strengthen feedback and dialogue mechanisms.

Suppliers that do not demonstrate progress against their action plans are expected to engage with us to identify and implement immediate corrective actions. LDH is committed to supporting suppliers throughout this process by providing additional guidance and capacity-building resources where needed.

We plan to focus on sites with critical non-conformances raised to ensure no repeat non-conformances in future audits. We will achieve this by supporting sites to develop robust action plans based on the root cause and analysis.

KEY INDICATOR	ACTIVITY	OUTCOME
All sites registered on Sedex	Ensure all sites are registered and linked to LDH. All suppliers links must be indirectly shared with the customers.	• LDH & customers can monitor the audit progress of each site, SAQ results and RADAR ratings on SEDEX.
SAQ completed every 6 months at 100%	Ensure all sites are informed when their SAQ is due for an update & that SAQ is completed within the required timeframe.	• LDH & customers can review the data provided in the SAQ. • Risk ratings are subject to change depending on the SAQ answers submitted, which can consequently change the audit requirements for a site.
Reduction in the number of critical non-compliances received (TYvs LY)	Monitor critical non-compliances received for each site & engage with the site to ensure these are closed within the timeframe allocated. Inform customers on the action plan and progression of closure.	• Identify root causes & solutions with the site. • Mitigate repeat non-compliance. • Implement long-term solutions for the issue raised.
All audits NCs closed out within the specified timescale.	Liaise with the site to address all raised non-compliances, to develop and communicate an action plan to address root causes and effective solutions.	• Ensure all desktop evidence is uploaded within the given timescale. • Site to book a follow-up audit window before the closure date expires. • Communicate any derogation, issues or disputes with the customers to inform them of delays.

Case Study 3: Reduction in Critical Non-Compliances

Our Commitment

At LDH, we believe that ethical sourcing requires more than policies, it demands action, oversight, and continuous improvement. One of the ways we bring this to life is through our commitment to reducing critical non-compliances (NCs) at our Tier 1 manufacturing sites.

The Process

All Tier 1 sites undergo periodic SMETA audits, which assess compliance with labour, health and safety, environmental, and business ethics standards. When an audit is completed, the site is required to:

- Share the audit results and Corrective Action Plan Report (CAPR) with LDH immediately.
- Submit a comprehensive, time-bound action plan detailing how each non-compliance will be addressed.
- Prioritise critical NCs, which must be resolved urgently or within the timeframe set by the audit body.

Ongoing Engagement

Our role doesn't end with receiving the CAPR. We:

- Review each action plan in detail.
- Maintain regular communication with the site to monitor progress.
- Offer support and guidance to ensure timely and effective closure of issues.

We also take a data-driven approach, tracking patterns in critical NCs and identifying repeat occurrences. This allows us to work with sites on long-term solutions that prevent issues from recurring, rather than applying short-term fixes.

The Impact

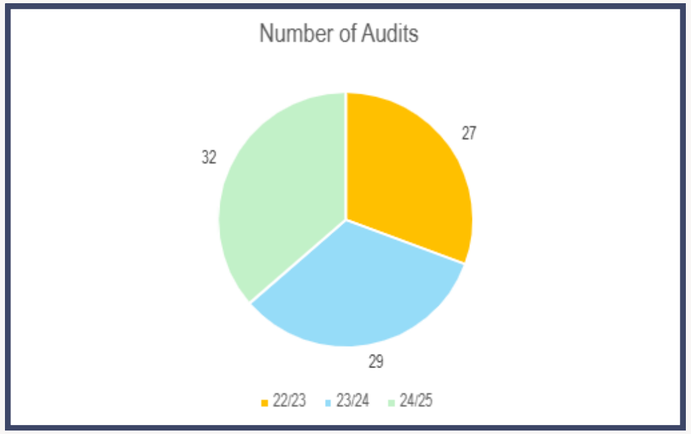
This structured and proactive approach is delivering results. In 2025:

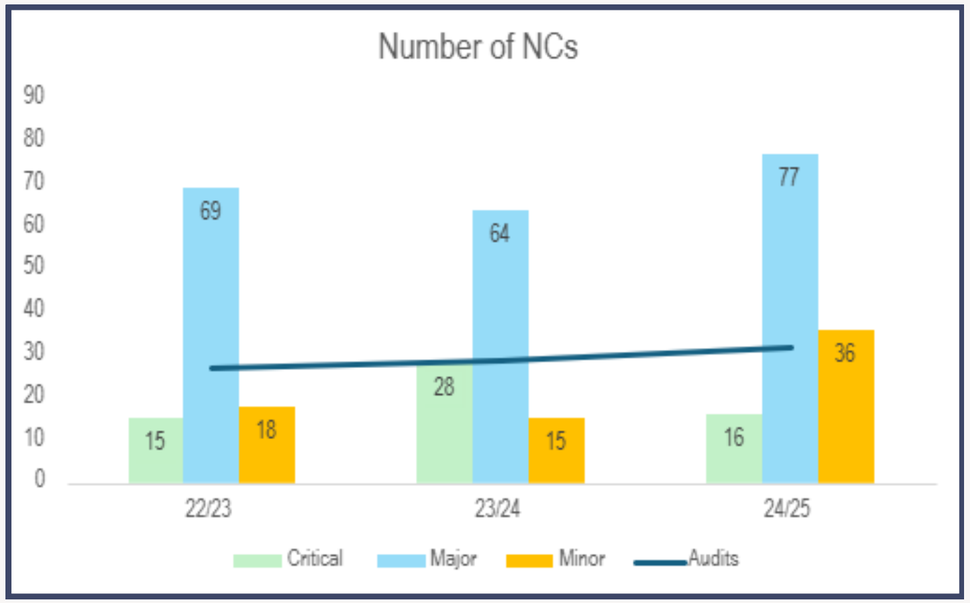
The number of Tier 1 sites audited increased , whilst the number of NCs decreased. This represents a 42.9% reduction in critical NCs,despite an increase in the number of sites audited.

Looking Ahead

We are proud of this progress, but we know the work is never done. Our goal is to:

- Maintain and build on this reduction.
- Continue supporting suppliers in developing sustainable, long-term improvements.
- Ensure that every audit leads to real change, not just compliance on paper, but better conditions for workers in practice.





42.9% Reduction in Critical NCs

TRAINING & CAPACITY BUILDING

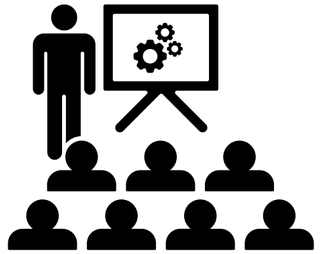
LDH is committed to raising awareness of human rights risks, including modern slavery, across our business operations and supply chains. In 2018, we launched a dedicated training programme designed to enhance understanding and identification of modern slavery risks. This initiative aimed to strengthen our ability to detect potential issues during technical supplier audits, complementing the insights gained through SMETA audits.

To reinforce leadership engagement, we delivered modern slavery training at the Director level, with 80% of relevant staff participating. This top-down approach ensures that ethical considerations are embedded in strategic decision-making.

In 2024, we further strengthened our internal capabilities by appointing a Responsible Sourcing Administrator. This role has been instrumental in advancing our knowledge base through training with organisations such as Stronger Together, Sedex, and Oxfam. Ongoing professional development in this area will continue into 2025 and beyond.

Our training efforts reflect a proactive and evolving approach to addressing complex ethical challenges. We are committed to deepening our understanding of modern slavery risks from the source of raw materials through to the final stages of the supply chain. This includes building the skills, processes, and resources necessary to support responsible sourcing practices across the organisation.
Regular training and capacity-building sessions are scheduled for relevant staff across LDH, ensuring that our teams remain informed, equipped, and engaged in the fight against modern slavery.

TRAINING 2025
Introduction to Responsible recruitment
Labour Supply Chain Due Diligence
Fair, Equal & Dignified Opportunity & Treatment
Impact Measurement & Management for SDGs
New SMETA 7 training
Eliminating worker-paid fees
Oxfam Gender Advisory



Collaboration & Engagement

LDH recognises the deep-rooted socio-economic factors that can undermine the rights of workers and stakeholders across global supply chains. We also acknowledge that the root causes of modern slavery and human trafficking often lie beyond the influence of any single buyer or supplier. Addressing these systemic issues requires collective action and sustained collaboration.

To that end, LDH is an active member of the Food Network for Ethical Trade (FNET), where we contribute to several working groups focused on improving labour standards and ethical practices. We have actively participated in a collaborative worker voice survey on Italian tomato farms and have taken a leading role in encouraging greater engagement and participation from growers.

In 2025, we are continuing and expanding our involvement in these collaborative efforts, with a particular focus on complex and high-risk supply chains such as wild-caught seafood. By working with peers, industry bodies, and civil society organisations, we aim to drive systemic improvements and promote responsible sourcing practices across all tiers of our supply chain.

PARTICIPATION	2025	2026
FNET Working Groups	Responsible Recruitment Climate & Human Rights Developing Common Due Diligence Tools	Responsible Recruitment Climate & Human Rights Developing Common Due Diligence Tools
Sea Alliance	Worker Driven Social Responsibility (Fishing)	Worker Driven Social Responsibility (Fishing)
Work Voice Survey	Ongoing engagement and development to increase participation	Grower surveys were incorporated to enhance insight into how human rights requirements are effectively cascaded from growers to workers
Integrity Risk Assessment	Implemented across three suppliers, using insights from practical execution to refine and strengthen the action plan and remediation components of the framework.	Evaluate high-risk raw materials and associated countries of origin to support a risk-based supplier prioritisation and rollout strategy in 2026, starting with tomato-based products, tuna, and wheat-based products.

Case Study 4: Empowering Workers and Strengthening Due Diligence in Italian Tomato Supply Chains Farms

Background

At LDH, we understand that meaningful due diligence goes beyond audits, it requires listening to workers, understanding their experiences, and acting on what we learn. In collaboration with La Doria and through a series of targeted initiatives, we've taken significant steps to improve working conditions on Italian tomato farms.

Listening to Workers: The Starting Point

Our journey began with a commitment to worker voice. Through tools like the &Wider Worker Voice Survey, participation in the ETI Working Group on Grievance Mechanisms, and direct supplier visits, we gathered valuable insights into the lived experiences of agricultural workers.

The survey results highlighted three key areas where workers expressed the most concern:

- Freedom of Association
- Fair & Timely Remuneration
- Health & Safety

These themes became the foundation for a collaborative action plan with our supplier.

Turning Insight into Action: A Multi-Faceted Response

1. Digital Platform for Worker Empowerment

To bridge the gap between growers and workers, our supplier developed a digital platform that:

- Provides access to key documents like contracts, payslips, and workers' rights.
- Offers multilingual support to ensure accessibility.
- Uses visual tools like cartoons to explain rights and responsibilities in a universally understandable way.

2. On-the-Ground Communication Tools

Recognising the importance of accessible communication, we introduced:

- Confidential suggestion boxes placed directly in the fields.
- QR codes printed on starter packs and banners, linking workers to essential information and training materials.

3. Targeted Training Initiatives

Training was tailored to meet the needs of the workforce, focusing on:

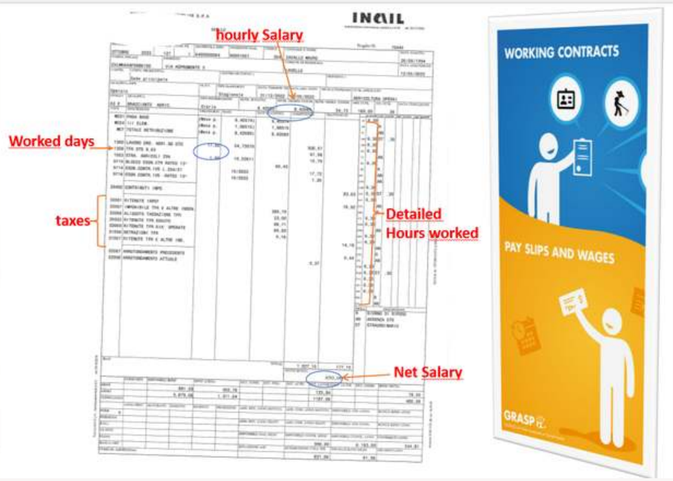
- Digital literacy
- Understanding contracts and payslips
- Basic Italian language skills
- Grievance mechanisms—explaining who to contact, why it matters, and how to raise concerns safe

Impact: Building Knowledge and Confidence

These initiatives have had a tangible impact. Workers now have:

- Greater access to information about their rights and responsibilities
- Clearer understanding of their pay, working hours, and employment terms
- Practical tools to raise concerns and seek support

This work not only empowers workers but also strengthens our due diligence processes by creating a more transparent and responsive supply chain.



Looking Ahead

We remain committed to:

- Expanding the reach of these tools across more farms
- Continuously improving based on worker feedback
- Supporting our suppliers in embedding these practices for the long term

For LDH, this is more than a compliance exercise—it's about creating a supply chain where every worker is informed, respected, and heard.

ACHIEVED STEPS IN 2025

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PLAN FOR 2025/26	PROGRESS	WHAT WAS ACHIEVED
Expand Human Rights Due Diligence Data Collection & Enhancing the Seafood Risk Assessment Framework	On Track	• The HRDD and supply chain mapping document has been deployed across all direct-sourcing primary raw-material suppliers. • The seafood risk assessment and supply chain mapping exercise achieved a 100% supplier response rate. • A second phase of HRDD and supply-chain mapping is being rolled out to indirect-sourcing primary raw-material suppliers, targeting complex supply chains.
Deliver the Integrity Risk Assessment (Phase 1)	Achieved	• Risk assessments were conducted for three suppliers • On-site review of exsisting controls and data gathering were conducted • Collaborative action plans created • A prioritisation review was conducted to plan delivery of the risk assessment in 2026
Grievance Mechanism Data Expansion	On Track	• Expanded grievance-mechanism data collection as part of the onboarding process for new suppliers. • Conducted a review of grievance cases raised over the past year, including assessment of remediation actions taken. • Identified the need for additional grievance-mechanism data from existing sites to strengthen ongoing monitoring.
Policy Review	Achieved	• Collected data on customer policy reuqirements to conduct a gap analysis again suppliers • Collected all supplier policies to align with LDH and customer requirements • Communictated gaps to develop action plans for remediation
Human Rights Maturity Assessement	On Track	• Delivered an end-to-end human rights maturity assessment spanning supply-chain and internal operations. • Strengthened the assessment through independent external review of key documents, policies, procedures, risk assessments, and governance arrangements. • Defined a forward-looking action plan with prioritised short-, medium-, and long-term human rights objectives.

NEXT STEPS IN 2026/27

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Expand and Strengthen Human Rights Due Diligence

- Scale and enhance supply chain human rights due diligence data collection, with a focus on higher-risk regions and suppliers.
- Analyse data outputs and perform a comprehensive gap analysis against regulatory, customer, and best-practice expectations.
- Develop clearer, more consistent communication and engagement channels with suppliers to support gap closure and continuous improvement.

Deliver the Integrity Risk Assessment - Phase 2

- Extend integrity risk assessments to prioritised supply chains for 2026.
- Review progress against 2025 action plans and assess the effectiveness of remediation activities.

Develop and Embed a Remediation Procedure

- Establish a structured, risk-based remediation process aligned with international human rights standards.
- Clearly communicate roles, responsibilities, and escalation pathways to internal stakeholders and supply chain partners to support effective implementation.

Map and Assess LDH Labour and Service Providers

- Establish a comprehensive overview of LDH's labour and service provider network.
- Gather and assess HRDD data to identify human rights and labour-related risks.
- Use gap analysis outcomes to define and implement targeted action plans with relevant providers.

Conduct Third-Party Assessment for LDH Operations

- Engage an independent consultant to conduct on-site walkthrough assessments of LDH warehouses and operational sites.
- Assess findings to determine the need for further third-party audits and to inform proportionate risk mitigation actions.

Focus on human rights due diligence on tuna vessels

- Enhance oversight of human rights risks within tuna vessel operations through targeted due diligence reviews.
- Evaluate existing programmes and vessel-level data to identify gaps in visibility and risk management.
- Collaborate with suppliers and partners to develop and implement action plans addressing priority risks..

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