

Modern Slavery Statement **Noble Foods 2025**

The UK Modern Slavery Act 2015 (the 'Act') requires business to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. We are fully committed to playing our part in eradicating modern slavery and we firmly advocate for transparency and collaboration to eliminate the risks of modern slavery.

This statement refers to the financial year ending 30th September 2025. It sets out the steps taken by us to prevent modern slavery and human trafficking in our own operations and supply chains, using the UN Guiding Principles on Business and Human Rights as our framework for this statement.

Entities that are within Noble Foods Group that are required to comply with the provision to produce a modern slavery statement are: Noble Foods Ltd, Noble Foods, Noble Logistics, Noble Green Energy, Noble Egg Innovations and Plant Heads.

An introduction from our CEO

Noble Foods is a successful, family-owned food producer whose story began over 100 years ago; renowned for market-leading egg brands including the happy egg co. and Purely Organic and for its quality animal feed. The company has more than 250 producers around the UK, packs some 33 million British Lion-approved eggs every week and mills 900kT of feed every year.

I'm proud of Noble Foods' positive legacy in the industry. As a purpose-driven business focused on better nourishing people, animals, and the planet, our team is dedicated to nurturing animals, supporting our partners and communities, and bringing new life to the humble egg with their creativity, engagement, and expertise.

As a responsible company we always strive to do the right thing, we have had robust practices and policies in place for many years to help us meet this objective. We are committed to communicating openly and transparently with all stakeholders to ensure that our zero-tolerance stance is shared by everyone we work with.

We are committed to preventing slavery, forced labour, harmful child labour and human trafficking in all our activities and require that our suppliers have the same commitment.

All our colleagues are responsible for understanding their role in preventing Modern Slavery in the workplace. This includes avoiding risks and reporting concerns confidentially and without fear through our whistleblowing procedure.

Modern Slavery and our risk mitigation continues to play an active part within our conversations at Board level, escalating through our Senior Leadership Teams and beyond. While we have made significant progress in this area, we recognise that there is always more to be done. This statement outlines our achievements and ongoing actions for 2025/26.

Duncan Everett
Duncan
Chief Executive Officer
February 2026

Our organisation, business and supply chains

Legal structure and group entities. Noble Foods is a privately owned, fourth-generation family business incorporated in England and Wales. The following entities within the Noble Foods Group are within scope of the Modern Slavery Act 2015 and are covered by this statement: Noble Foods Ltd, Noble Logistics, Noble Green Energy, Noble Egg Innovations, and Plant Heads. The Group is headquartered in the United Kingdom and all operations are UK based.

Our business. Noble Foods is one of the UK's leading agrifood businesses, producing and packing British eggs at scale. The Group packs approximately 33 million British Lion-approved eggs every week, mills around 900,000 tonnes of animal feed per year, and supplies market-leading brands including the happy egg co. and Purely Organic. Noble Foods employs approximately 1500 people across its operations, including pack centres, feed mills, logistics and support functions.

Countries of operation. Noble Foods' operations are based entirely within the United Kingdom. Our supply chain is predominantly UK-sourced; however, some ingredients, packaging materials and commodities are procured internationally, including from South America and Brazil. Where international sourcing occurs, we apply enhanced due diligence to assess and address modern slavery and human rights risks.

Our supply chains. Noble Foods' supply chains can be broadly described as follows:

Tier 1 – Direct suppliers: over 250 registered egg producers across the UK; animal feed ingredient suppliers and packaging suppliers. We have direct commercial relationships with all Tier 1 suppliers and apply our Supplier Code of Conduct to them.

Labour supply chain: catching gangs engaged for poultry operations are sourced from GLAA licensed agencies. Agency workers sourced through professional employment agencies we also have some contracted cleaning, security and facilities services at our sites. These categories of worker are considered to carry an elevated risk of labour exploitation and receive specific attention through our risk assessment and audit programmes.

Highest-risk areas. Based on our risk assessments and supply chain mapping to date, we consider the following areas to carry the greatest inherent modern slavery risk: (1) agency and temporary labour; (2) catching gangs and their sub-contracted labour, where workers may be vulnerable to exploitation and recruitment abuse; (3) international commodity sourcing, where supply chains may pass through higher-risk geographies; and (4) cleaning, catering and facilities contractors whose workforces can include migrant and seasonal workers. These areas receive enhanced scrutiny through our audit programme, SEDEX assessments, and GLAA engagement.

Policies in relation to slavery and human trafficking

Our policies clearly state that we will not tolerate forced labour (including human trafficking) or child labour in our operations or operations related to supply to Noble Foods. We conduct internal and external audits to ensure compliance, we work collaboratively and proactively with the GLAA and operate the following policies that describe our approach to the identification of modern slavery risks, together with the steps to be taken to prevent slavery and human trafficking in our operations:

We will not knowingly use any individual or organisation to source and supply goods or workers using practices of forced labour or human trafficking for labour exploitation. We will report any evidence or suspicion of cases of hidden third-party labour exploitation to the GLAA immediately. Failure by managers and leaders of the Company, third party labour providers or organisations in the supply chain to act upon concerns of worker maltreatment, coercion or harassment will be regarded as a gross misconduct offence or breach of contract and will be managed accordingly through the relevant disciplinary or contractual termination processes.

Human Rights Due Diligence Policy. Our Human Rights Due Diligence policy is designed to ensure that we respect and uphold human rights throughout our operations and supply chains and aligns to both UK legislation and complies with the ETI base code. We fully commit to the ETI base code and train this out to all colleagues at induction.

Whistleblowing Policy. We actively encourage all our colleagues to report any concerns that raise suspicions related to human trafficking, both inside our organisation and through the supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. In 2017 Noble Foods introduced the Safe Call confidential and anonymous whistleblowing hotline. In the last 12 months we have received 33 calls (including test calls), all of which were thoroughly investigated and concluded, the majority of calls pertained to one internal location and an ongoing grievance which is now concluded. None of the calls related to modern slavery or human rights.

Recruitment Policy. We will not use any individual or organisation to source and supply workers using practices of forced labour, human trafficking for labour exploitation, payment for work-finding services or any work-related exploitation such as forced use of accommodation. We confirm (through our recruiting processes or through the recruiting processes of third-party agencies) that workers are not subject to any of the above practices and will report any evidence or suspicion of cases of hidden third-party labour exploitation to the GLAA immediately.

Agency workers. We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from them. Regular audits of a random selection of agency workers, regular audits of each agency as well as audits of new agencies beginning to supply us are part of the processes by which risks of slavery and human trafficking are addressed in relation to agency workers. All agencies used for temporary labour in the manufacturing of our products are licensed by the GLAA. We actively check these and audit them on a regular basis. Temporary workers are also interviewed to look for signs of any potential breaches.

Business Integrity Policy. Our Business Integrity Policy clearly communicates to colleagues the actions and behaviour expected of them when representing us. We strive to maintain the highest standards of conduct and ethical behaviour including when operating and managing our supply chain.

Risk Assessments and Audits

We expect our suppliers to operate to the same ethical standards that we employ ourselves. Noble Foods is an AB Member of Supplier Ethical Data Exchange

(SEDEX) and we have been building SEDEX membership progressively across our group and supply base.

As an active supporter of 'Stronger Together', we have completed the Stronger Together Progress Monitoring Tool. This is a pioneering online self-assessment which supports companies to measure progress being made and to highlight their next steps in addressing modern slavery risks within their business and supply chains. Our starting score in 2020 was 47% and we raised this to 55% in 2021, 60% in 2022, 63% in 2023 and 64% in 2024. For 2025, we increased to **79%** thanks to the significant work undertaken in risk assessing and mapping our supply chain. We have action plans in place to further increase this for 2026 onwards, as we complete our double materiality assessment and commence supply chain engagement. We also will work on our response and remedy plans. We continue to complete the assessment regularly to measure our improvement.



We have completed the Stronger Together implementation checklist for all our sites. Since starting these assessments in 2019 our site scores have improved from 40-45% to 52-67% in 2020 to 60%-76% in 2021, 78-81% in 2022 and 82-86% across our sites in 2023. We set ourselves a target of 85% on our Stronger Together Site Assessments which was achieved in 2023 and 2024 with scores ranging from 82-88%, we continue to update our assessments to continuously improve and 2025 saw our sites increase, with scores ranging from 83-86%. Local action plans are in place, and we are committed to reassessing quarterly to measure improvement, share best practice, and ensure action plans are up to date.

Modern Slavery Risks in our Supply Chain

We undertake due diligence when considering taking on new suppliers, and we regularly review our existing suppliers. Our due diligence includes:

- We map our supply chain to identify and assess particular product or geographical risks of modern slavery and human trafficking
- We endeavor to map the secondary value chains within our primary supply chain
- conducting supplier audits or assessments through Noble Foods own staff and third-party auditors which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through own staff/ third party auditors and requiring them to implement action plans.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular ("Stronger together", "Ethical trading" initiatives).
- Issuing all our suppliers with our updated Supplier Code of Conduct.

Additionally, we play an active role in FNET (Food Network for Ethical Trade) which is a collaboration between suppliers and retailers.

In 2023 we commenced a cross-business project to improve our supplier appointment process and as part of this commitment we appointed our Supplier Onboarding and Compliance Manager in 2024. Their role has been implemented alongside our ongoing commitment to leverage modern technology to make our process more robust and consistent and to dynamically risk assess our supply chain and to ensure compliance with our supplier code of conduct and ethical standards.

Remediation and response to incidents

Noble Foods operates a zero-tolerance approach to modern slavery and is committed to taking prompt and effective action when a concern, incident or suspected case is identified. The following sets out how we currently manage such situations, and we are actively developing a formal Response and Remediation Policy which is to be finalised in 2026 and will consolidate and strengthen these processes.

How incidents are reported and escalated. Any colleague, worker, supplier or third party who suspects or identifies a case of modern slavery, forced labour, labour exploitation or human trafficking is encouraged to raise this immediately through one of the following channels: (1) directly with a line manager or site HR representative; (2) via our confidential Safe Call whistleblowing hotline, which is available 24 hours a day, seven days a week, to all workers including agency and temporary staff; or (3) by reporting directly to the GLAA, where the concern involves a third-party labour provider. All reports received through Safe Call are logged, investigated promptly, and reported to the Chief People and Impact Officer who holds overall accountability for modern slavery matters. Where a credible concern involves potential criminal activity, Noble Foods will report this to the relevant statutory authorities, including the GLAA and/or the police, without delay.

Responsibility for investigation. The Chief People and Impact Officer is the designated lead for modern slavery incident response at Noble Foods. Upon receipt of a concern, an investigation will be initiated within 48 hours and will be conducted by, or under the oversight of, the People team in conjunction with the relevant site or function leadership. Where the concern involves a supplier or third-party labour provider, the Supplier Onboarding and Compliance Manager will be involved in coordinating the supplier-side response. All investigations are conducted confidentially, and outcomes are escalated to the Board where appropriate. Noble Foods maintains a log of all concerns raised, investigations conducted, and actions taken, which informs our year-on-year reporting.

Support for victims. The safety and welfare of any individual identified as a potential victim of modern slavery is our first priority. Where a victim is identified within our own operations or supply chain, Noble Foods will: (1) ensure the immediate safety of the individual and provide access to appropriate support; (2) refer the individual to statutory support services and, where applicable, submit a referral to the National Referral Mechanism (NRM) to ensure they can access specialist care and legal entitlements; (3) cooperate fully with statutory agencies including the police, the GLAA, and the Home Office; and (4) ensure the individual is not penalised for any irregularities in their employment status that may have arisen as a direct result of their exploitation. We will work with relevant NGOs and specialist support organisations as needed to ensure appropriate care is in place.

Managing non-compliant suppliers. Where a supplier audit, investigation or reported concern reveals evidence or strong suspicion of modern slavery or serious labour rights violations, Noble Foods will take action proportionate to the severity of the findings. Our approach follows a structured escalation: (1) where the issue is identified as a systemic or process failure rather than deliberate exploitation, we will work collaboratively with the supplier to develop a time-bound corrective action plan, with progress monitored through re-audit or documentary evidence within an agreed timeframe; (2) where a supplier fails to remediate within the agreed timeframe, or where findings indicate wilful non-compliance, Noble Foods reserves the right to suspend or terminate the supplier relationship; (3) where there is evidence of active exploitation of workers, we will terminate the relationship immediately and refer the matter to the relevant statutory authorities. In all cases, we aim to consider the impact of any termination decision on the workers involved, recognising that an abrupt exit from a supplier relationship can sometimes increase harm to vulnerable workers.

Relevant training

We provide information on “Hidden Labour Exploitation” to our workforce through a variety of formats such as workplace posters, worker leaflets, presentations during our induction and training period and through internal auditing processes. We also actively encourage colleagues to report cases of hidden third-party labour exploitation, investigating and acting on any reports as appropriate.

The ‘Stronger Together - Understanding & Tackling Modern Slavery’ course content has been delivered to operational employees and continues to be provided to all new employees in order to educate the workforce and enable them to recognise and report the symptoms of slavery and human trafficking.

We had an objective to deliver Stronger Together training, via Ngage webinars, to more of our external producers. In 2025 we completed additional sessions, as well as extending the training and guidance for our catching gang providers.

KPI's

We are committed to monitoring our progress in relation to modern slavery and ethical trade and will do this through the completion of the Stronger Together Progress Monitoring Tool as a group and by local site assessments using the Stronger Together implementation checklist alongside our wider KPIs

Summary of our KPI's Year on Year:

KPI	2021	2022	2023	2024	2025
Stronger Together Progress Reporting Tool Score	55%	57%	60%	63%	79%
Stronger Together Site Impact Assessment Score (Average)	68%	79%	84%	85%	86%
% Sites who have completed an agency audit within 12 months	100%	100%	100%	100%	100%
Stronger Together training attended vs planned			125%	100%	100%
% Pack Centre Sites with up-to-date SEDEX audit	100%	100%	100%	100%	100%
# Whistleblowing Line Calls investigated and closed out	100%	100%	100%	100%	100%

Our key focus areas for last year were:

- Cascade of our updated Supplier Engagement Process, tracking responses from our Tier 1 Suppliers to at least 80% and analysing the data received to further develop our KPIs.
- Collaborating with our suppliers to understand their human rights risks, what actions they are taking to mitigate risks and support them through the development of these plans.
- Using our experience to develop a plan on how we can further engage with our Catching Gangs and their Risk Assessments to help them take proactive steps with their identified risks.

2026 Commitments:

In line with our BCorp Human Rights work development we will:

- Complete our human rights saliency assessment
- Design and detail our process to collect, prioritise, and escalate information on actual and potential negative human rights impacts in the supply chain
- Continue to work with suppliers to prevent or mitigate the most salient human rights issues.
- Further develop our Response and Remediation policy for use across the supply chain

**This statement will be reviewed and published annually.
This statement was approved by the board of Noble Foods.**

February 2026

