



THE
COMPLEAT
FOOD GROUP

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

2024-25



CONTENTS

Introduction

Our Business and Supply Chain

Uk Implementation

- Recruitment
- Speak Up & Whistleblowing
- Training
- Outsourced Manufacturing

Managing Risk

- Risk Assessment
- Audits

Collaboration

Targets

- KPIs

Objectives

Introduction

The Compleat Food Group recognises the imperative need to address modern slavery and human trafficking within our supply chains and business operations.

The Compleat Food Group (Holdings) Limited and all members of its UK corporate group, trading collectively (and referred to hereinafter) as “The Compleat Food Group”, produce an annual Modern Slavery statement setting out the steps that The Compleat Food Group has taken to seek to ensure that modern slavery does not take place in our businesses or supply chain. Accordingly, this Modern Slavery statement applies to each of the following legal entities:-

Legal entity	Site(s)
Pork Farks Limited	Nottingham (Riverside and Tottle), Palethorpes, Milton Keynes
Pork Farms Caspian Limited	Poole
The Compleat Food Group (Bristol) Limited	Bristol
Winterbotham, Darby & Co Limited	Redhill
Winterbotham Darby Clitheroe Limited	Clitheroe, Twin Brook (Clitheroe)
SK Chilled Foods Limited	Middlesbrough (Southbank and Riverside)
Zorba Delicacies Limited	Ebbw Vale
Harvey & Brockless Limited	Battersea, Evesham
The Real Yorkshire Pudding Co Limited	Thorne
Fresh-Pak Chilled Foods Limited	Barnsley
Wright’s Pies (Shelton) Limited	Crewe

The Compleat Food Group believe in the fundamental dignity and rights of all individuals. This Modern Slavery Statement serves as a testament to our unwavering pledge to uphold ethical standards and ensure transparency throughout our operations and supply chain. It outlines the measures we have implemented and continue to develop to prevent, detect, and address instances of modern slavery and human trafficking.

We are committed to fostering a culture of accountability, integrity, and respect for human rights and as a business we follow the requirements of the Ethical Trade Initiative (ETI), requiring all suppliers to comply with this. This Statement, which is reviewed on an annual basis, has been approved by our Board of Directors.

Nick Field
Chief Executive Officer
The Compleat Food Group



Our Business

What we do

Formed in 2021, The Compleat Food Group is a food group on a mission to create great quality, tasty and affordable food, that people love to eat.

We pride ourselves on doing things differently – on embracing innovation, quality and the joy of bringing people together through the love of great food. From our commitment to raising the bar for food standards to our dedication to sustainability, we're not just feeding people, we're shaping the future of food for the better.

We call it **FOOD TO FEEL GOOD**

We employ more than 6000 people across 17 sites and have more than 100 supply partners. With an annual turnover in excess of £1 billion, our ambition is to become the UK's number one chilled prepared food company by shaping the future of food for the better. We're owned by European private equity firm PAI Partners



OUR IN-HOUSE NETWORK

17 MANUFACTURING SITES

Clitheroe & Twin Brook

Olives & Antipasti
Pickles & Ferments

Crewe

Savoury Pastry & Sweet
Pastry

Palethorpes

Savoury Pastry & Party Food

Worcester

Warehouse & Distribution

Evesham

Cheeses, Sauces & Dips

Poole

Savoury Pastry

Doncaster

Yorkshire Puddings

Middlesbrough

Fried, Party Food

Nottingham

Tottle Bakery: Savoury Pastry

Riverside Bakery: Savoury Pastry

Milton Keynes

Fried, Party Food

Battersea

Cheese

Redhill

Vegan Cheese & Continental Meats

Ebbw Vale

Dips, Houmous, Sauces & Soup

Barnsley

Egg Products, Deli Fillers, Food-to-go Snacks, Dips

Our sites in the UK comprise factories, storage facilities and office hubs. Distribution of our products is made by 3rd party providers.

In addition to our UK manufacturing sites we also operate a production & distribution site in Dubai supplying food service customers.

We're home to exciting brands including Pork Farms, Wall's Pastry, Squeaky Bean, Unearthed, Vadasz, Wrights, Palace Culture and The Real Yorkshire Pudding Company.

We're also a leading supplier of delicious own-label pastry, sweet bakery, party food, olives and antipasti, continental meats, Yorkshire puddings, dips and sauces and plant-based food to the UK's largest food retailers, foodservice companies, wholesalers, restaurant chains, travel operators and contract caterers.



Our Purpose

At Compleat, we believe that food should make you feel good. Our journey isn't just about the meals we create, but the impact we have on people, the planet, and communities. Our values are the principles that guide the decisions we make and embody who we are as a business. Our commitment to tackling modern slavery is reflected in many of these values.



QUALITY

Quality is at the heart of everything we do, always



INTEGRITY

Doing the right thing, even when nobody is looking



PACE

We make clear decisions and deliver on our commitments on time



CUSTOMER FIRST

Driving category growth for our customers through our focus on understanding consumers and our relentless pursuit of innovation



COURAGE

Having the courage to think differently and challenge the norm



ONE COMPLEAT

Working together and supporting each other as one Compleat team. Making Food to Feel Good



Our Supply Chain

Our supply base is complex, with manufacturing sites based in the UK and throughout Europe. We have strong, long standing supplier relationships with many of our European Outsourced partners which assists in the transparency of sourcing.



We source ingredients from over 1000 suppliers across the globe. These suppliers range from large world wide corporations to small family run farms and co-operatives. We deal with Agents as well as directly with manufacturers. These businesses will in turn work with their own supply chains of growers and processors contributing to a complex global supply chain. We have used digital mapping for over 10 years to provide full transparency of the supply base back to the farmer or grower of key raw materials. This well established technology helps us identify potential human rights risks posed within supply chains.



Governance & Policies

UK Operation

While our Human Resources and Ethical teams take a lead role on upholding human rights, all our departments are accountable and work together to achieve our goals. Monthly Group ethical meetings are held to focus on key human rights issues within our supply chains which includes emerging risks and driving longer term objectives.



Recruitment

The Compleat Food Group negotiate T&C's and SLA's with all recruitment agency partners used within the business to ensure they contain adequate contractual structures to mitigate slavery. A robust recruitment policy and set of practices exist, in line with UK legislation, including right to work document checks, contracts of employment and ensuring that personal information provided is genuine.

The Compleat Food Group are members of the Association of Labour Providers (ALP), which provides information and support to all the UK sites. Our Recruitment and HR functions have access to their specialised training.

We work together with our recruitment agency partners to ensure compliance to the Fair's Fair Programme established by ALP.

All labour providers are audited before commencing supply and then routinely at site level (including worker interviews). In addition, an annual compliance audit is completed centrally. Further to this our recruitment agency partners are required to commit to the requirement of our Responsible Sourcing policy.

Speak Up & Whistleblowing

Our Speak Up procedure across sites, provides all employees with a variety of routes to escalate concerns at a site or group level. This is supported by an independent whistleblowing hotline hosted by a third party. This provides the ability to raise concerns anonymously and in multiple languages. We encourage all our employees to Speak Up through our induction process and induction refresher programmes. All reports are tracked to enable trend analysis across the group, this is reviewed by the both the HR & Ethical team to establish future actions.

During FY ending 2025, QR codes were added to whistleblowing posters to give translations in key languages at each site.



Training & Capacity Building

We have a video which was developed with our human rights training provider Tyler Bladon for use within our induction programme. This is available for our colleagues in the roles who are most likely to encounter modern slavery activity and those who are responsible for taking the next steps. This is in line with our Response Plan.

The Compleat Food Group are Advanced Business partners of Stronger Together. We have reviewed the training carried out by members of the HR and Ethical Teams and have implemented mandatory training requirements for both new and existing colleagues, ensuring that awareness is refreshed every 3 years.

We take the opportunity throughout the year to raise the awareness of our colleagues to Modern Slavery and its associated risks by participating in events such as Anti Slavery Day in October.

At our sites we encourage workers to improve their language skills using Learn UK. A 12-week ESOL (English for speakers of other languages) course is available to get people from entry level all the way up to Level 2. This also includes Maths and IT skills. Enabling workers to improve their language skills gives them greater opportunities to understand their workers' rights and raise questions or concerns. During FY ending 2025 65 of our employees participated in this course and we aim to see an increase in participation during FY ending 2026.



Outsourced Partners

The strong relationships and long term business relationships we have with our Outsourced partners helps us to focus engagement of the manufacturing base in the issues surrounding modern day slavery and human trafficking.

During FY ending 2025 we have been gathering detailed information on the grievance mechanisms in place at key supplier sites and their processes for management of labour providers. We have been supporting sites with suitable materials and knowledge in order to embed and strengthen routine audits of their labour providers and contracted services.

Management of Suppliers

All suppliers are required to comply with our Responsible Sourcing Policy. This was updated during FY ending 2025 to give clarity on the ethical requirements we expect from the different types of suppliers we work with. This now includes specific requirements regarding Grievance and Whistleblowing, and the management of labour providers. This policy is being translated into key languages in our supply base to make it easily accessible for all. The Responsible Sourcing Policy is issued to prospective new suppliers as part of the onboarding process and is a pre requisite before any new supply can commence.

We also require that suppliers provide us with clear ethical data regarding their operations either by completing the SEDEX ethical questionnaire or our group ethical questionnaire. Any suppliers that are located in high risk countries are identified and are required to provide additional enhanced due diligence. This information is then used as part of our ethical risk assessment.

We are implementing regular communication with the procurement team to highlight compliance and emerging human rights issues within our supply chains.

During FY ending 2025 we have focused on gathering ethical data on key service providers to our own operations. Enabled by a collaboration of FNET and SEDEX we have been able to onboard 68 key Goods Not for Resale suppliers, covering engineering, haulage, services and packaging. This requirement now forms part of the tendering process for new providers.

Key Policies

The following policies are at the core of our approach to tackling modern slavery in our own operations and supply chains

- Child Labour Policy
- Tackling Modern Slavery and Labour Exploitation
- Bullying and Harassment Policy
- Anti Bribery and Corruption Policy
- Speak Up and Whistleblowing
- Recruitment Policy
- Right To Work Policy
- Responsible Sourcing Policy
- Ethical Policy
- Human Rights Policy
- Response Plan Policy



Assessing and Managing Risk

Risk Assessment

We have continued to develop our risk assessment approach using the FNET Ethical Trade Human Rights Risk Assessment tool and other data collected from SEDEX and supplier SAQ's as well as horizon scanning. This process helps us identify the areas of our supply chain at greatest risk, enabling us to focus our efforts more effectively.



Audits

Outsourced

During FY ending 2025 14 SMETA audits were undertaken across our Outsourced sites with 12 audits due to be scheduled during FY ending 2026. The Compleat Food Group work with a team of global independent APSCA approved auditors to conduct ethical audits. Local auditors who are familiar to the laws, working practices and language of the country where the audit is taking place are used.

UK manufacturing

During FY ending 2025, 4 ethical audits have been carried out at our UK manufacturing sites with 7 audits due to be undertaken during FY ending 2026.

Where a non-conformance is identified, The Compleat Food Group works together with sites and certification bodies to implement sustainable solutions to resolve these issues.

Audit non-conformances are trended to highlight common areas, which require focus. With the introduction of the new SMETA 7 standard we have seen the introduction of the CAR – Collaborative Action Required, a non compliance which requires collaboration from different stakeholders in order to resolve. We have been supporting our sites in understanding what is required with a CAR, which externally stakeholders need to be involved and how to implement effective change.

Priority Supply Chains

Our risk assessment process has helped to identify a number of key raw material chains where enhanced human rights focus is required:

- Meat, Poultry and Fish & Seafood. (Processing of these commodities relies on large amounts of unskilled labour.)
- Tomatoes. (Known issues with bonded labour in the Chinese tomato production and processing industry.)
- Paprika, Chilli and Onion powder. (Complex supply chains in high risk countries, often operated by agents, making full transparency of supply chains difficult.)

During FY ending 2026, we will look to work closely with suppliers of these products to build engagement and better understand the specific challenges.

Collaboration

We're committed to working collaboratively to increase our effectiveness in tackling modern slavery. We are active members of SEDEX and FNET (Food Network for Ethical Trade) and play an active role in other collaborative working groups across the industry and beyond.

The Compleat Food Group acknowledges that the most powerful way to drive sustainable change within global food supply chains is through collaboration and the collective leverage of the food industry as a whole.





FOOD NETWORK FOR ETHICAL TRADE

The Compleat Food Group is a proud member of The Food Network for Ethical Trade (FNET) which has been established to improve human rights in global food supply chains through a common approach to managing ethical trade. It aims to support suppliers to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and build a forum for sharing issues and challenges and, in the longer-term, to support the food industry to focus on promoting human rights in global food supply chains. The Compleat Food Group continue to be involved in a number of working groups across the network.



The Compleat Food Group are Advanced business partners of Stronger Together, a multi stakeholder initiative aiming to reduce modern slavery, particularly hidden forced labour, labour trafficking and other third party exploitation of workers. As Advanced business partners we provide evidence to publicly demonstrate the business's commitment to tackling hidden labour exploitation. During FY ending 2026 we will be exploring engagement with charities who work to tackle Modern Slavery and support survivors of Modern Slavery. These collaborations will improve our understanding of operators of Modern Slavery which in turn will help us strengthen our own processes and procedures against this crime.



The Association of Labour Provider is a not-for-profit organisation which promotes responsible recruitment .



The Compleat Food Group is a member of the SEDEX Stakeholder Forum (SSF), which brings together manufacturers, brands, retailers, NGO's, auditing bodies and industry experts to discuss challenges in ethical trade and responsible sourcing and solve these problems collaboratively.

Monitoring and Evaluation

We have an ethical committee which comprises of members of the UK operations HR teams and Ethical Team. The committee meets monthly to discuss Human Rights compliance within our own operations and our supply base. This enables teams to communicate issues and share learnings.

Worker interviews are carried out with agency workers on a biannual basis making sure that a minimum of 10% of agency workers are included.

We keep up to date with emerging trends and issues in labour exploitation through communication and resources from FNET and Stronger Together.

The Stronger Together Progress Report is conducted annually and enables us to review our achievements and areas to improve.



Targets

We have developed a set of KPI measures which will effectively measure our processes used to tackle modern slavery within our own operations and supply chains.

UK KPIS

	Target	FY ending 2024	FY ending 2025
Modern Slavery Training	100%	100%	100%
Suppliers of raw materials on SEDEX or completed company SAQ	100%	95.3%	92% *
Labour provider audits	100%	100%	100%
Worker interviews for agency number biannual	10% of daily requirement	9.5%	8.9%
Improvement in Stronger Together Business Partner Reporting Tool	% Increase year on year	60%	65%
Use of Speak Up Increase	% Increase year on year		21%
% of labour providers used who are Stronger Together Business Partners	100%		80%

*Recent acquisitions FY ending 2024 have seen a large increase in the number of ingredients suppliers, during time of reporting we are working with these supplier to link on SEDEX or completat the SAQ.

OUTSOURCED KPIS

	Target	FY ending 2024	FY ending 2025
Sites on SEDEX or completed company SAQ %	100%	96.4%	98%
Grievance Mechanism in place	100%	83%	88%
Where labour providers are used auditing in place	100%		50%

Objectives

We aim to be transparent as a business in the challenges that Modern Day Slavery and Human Rights violations present. As such we have identified opportunities within our own business and our supply chains where we feel further progress can be made. These objectives help us to focus on key areas of risk where change can be most impactful

FY ending 2025

We are pleased to report that we have completed the following objectives that were set in FY ending 2024 statement;

- Weighting the data for UK and outsourced to ensure that our Risk Assessment is truly reflective and highlights specific areas to target within our supply chain.
- Training Video on Modern Slavery Awareness for Managers to be implemented in the induction for all Line Leaders, Managers and HR on the new Compleat Learning system.
- Biannual personnel details audit of our payroll systems.
- Improvement in Stronger Together Business Partner Reporting Tool score.

The following objectives still need some additional work during FY ending 2026 to fully implement

- Ethical Risk Assessment to be reviewed annually to illustrate suppliers human rights progress.
- Identify partners to work with who are involved in helping victims of Modern Slavery.



Objectives

FY ending 2026

The following objectives will be driven by the Ethical team with support from UK site HR teams, Outsourced technical team and Procurement as appropriate. The progress of our objectives will be reviewed quarterly with these teams to ensure continued progress.

- Implement regular communication with the Procurement Team to make them aware of compliance and emerging human rights issues.
- Focus on our priority supply chains as these pose a human rights risk due the nature of their supply chains.
- Continue gathering ethical data on suppliers of new acquisition sites.
- Implement Response Plans for key Outsourced suppliers.
- Testing of our Response Plan annually.
- Gather ethical data on all packaging, storage and distribution used in our UK and Outsourced operations.
- Identify partners to work with who are involved in helping victims of Modern Slavery.
- Ethical Risk Assessment to be reviewed annually to illustrate suppliers human rights progress.



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