



Modern Slavery Act Statement

Modern Slavery Act Statement
1st April 2024 – 31st March 2025 Financial Year

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1. Our Commitment

We have a responsibility as a business to respect human rights. We know that by protecting those in our supply chains, we also strengthen our business as a whole while building trust with our customers. Kingfisher Foods’ mission is to provide high-quality products that are responsibly and ethically sourced with best-in-class service.

Addressing modern slavery in a comprehensive and targeted way is a key element of how we fulfil our commitment to providing responsibly and ethically sourced products. Modern slavery is one of the most severe breaches of human rights; with food processing, agriculture, and fishing representing sectors being most at risk. Nevertheless, identifying cases of modern slavery and forced labour within global food systems can be challenging. At Kingfisher Foods, we work pro-actively to ensure engagement with our modern slavery policies, within the context and belief that a widespread reduction in modern slavery can only be delivered through collaboration between businesses, governments, and civil society.



1 Head Office



36 employees



Products sourced from 16 countries



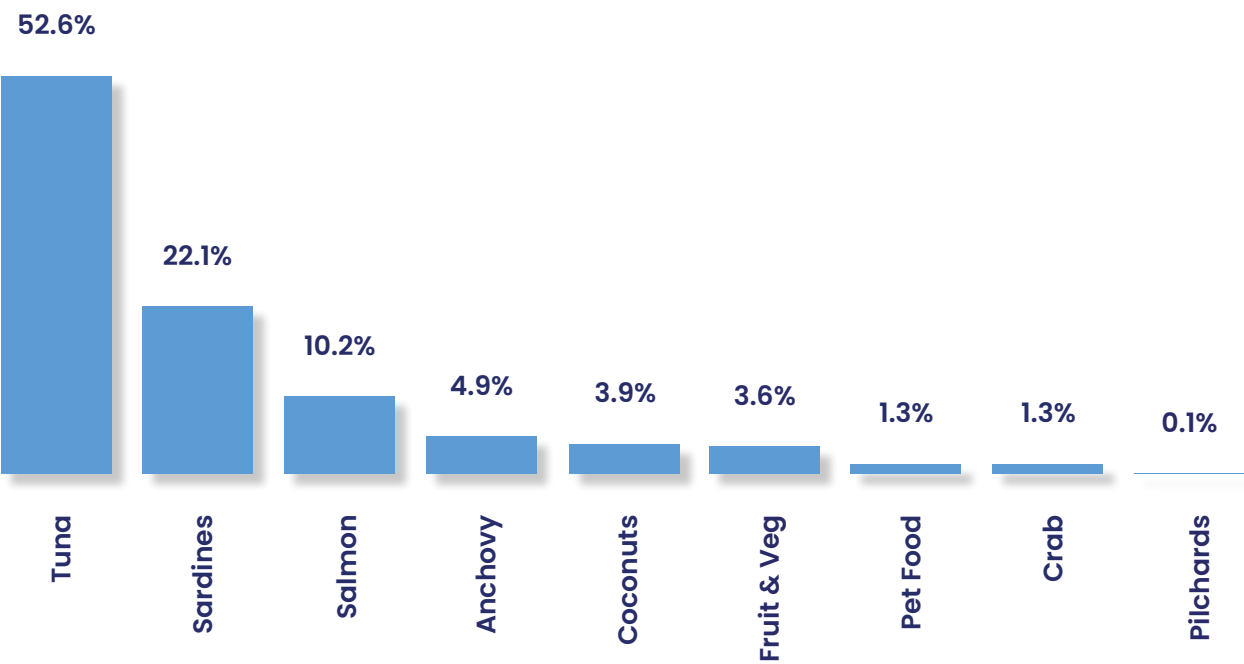
26,000 workers

2. Organisational Structure, Business, and Supply Chains

Kingfisher Foods is a leading UK-based value-added supplier of ambient foods, founded in 1979. The majority of our trade is in seafood; however, our product range includes fruit, vegetables, coconut products and pet food (*Figure 1*). Our products are sold under many customers’ own labels and our own brand, Kingfisher.

Kingfisher Foods head office is located in Reigate, Surrey, where most of our employees are located. However, our technical team has offices in Liverpool, UK and Seattle, USA. We source internationally across a number of continents; including Asia, Africa, Europe, North America, and South America. Kingfisher Foods does not own or operate any processing facilities, nor does it own or operate any fishing vessels. Kingfisher Foods is passionate about taking a partnership approach with our suppliers; focusing on fostering long-term relationships, many of which span over 20 years.

 **Figure 1: Volume of Cans**

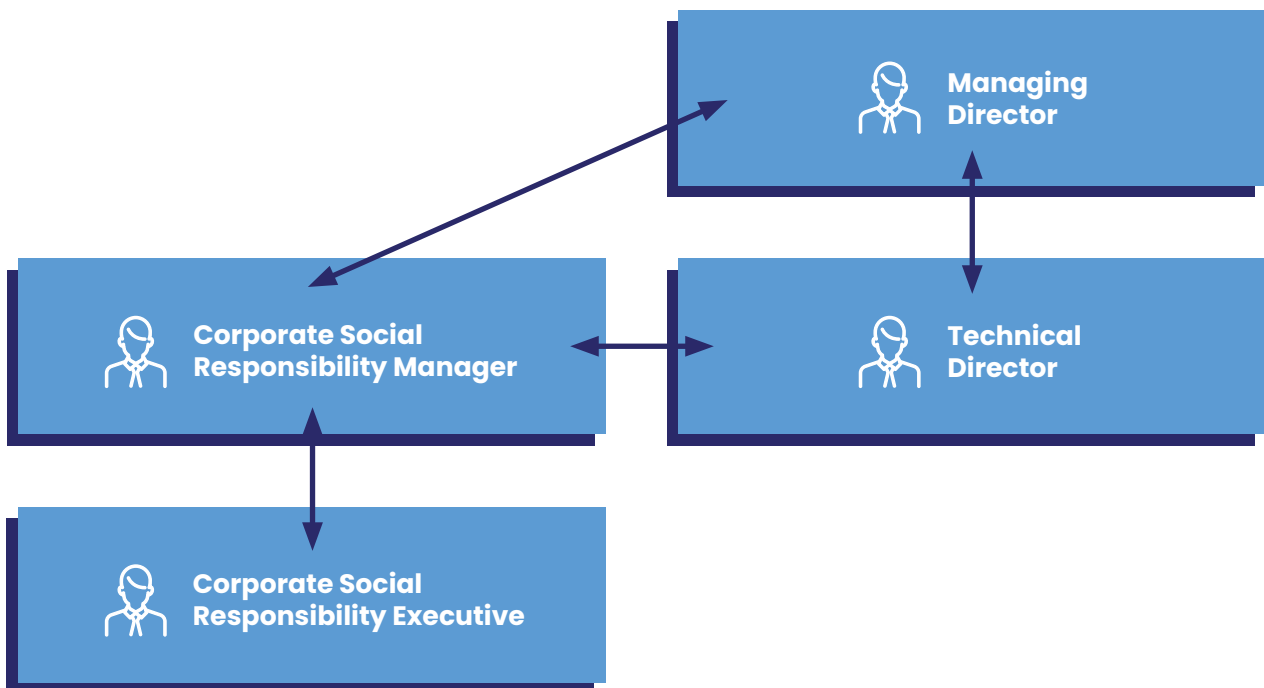


2.1 Governance

Our modern slavery strategy is led by the Corporate Social Responsibility (CSR) Manager, working on a day-to-day basis with the CSR Executive. To strengthen Kingfisher Foods' commitment to combating modern slavery, CSR is a standalone department, reporting to the Technical Director, with regular meetings with the Managing Director. This structure enables more efficient communication between the CSR Department, Technical Director, and Managing Director. This reflects Kingfisher Foods' high importance on CSR, with best ethical practice guiding all business decisions.

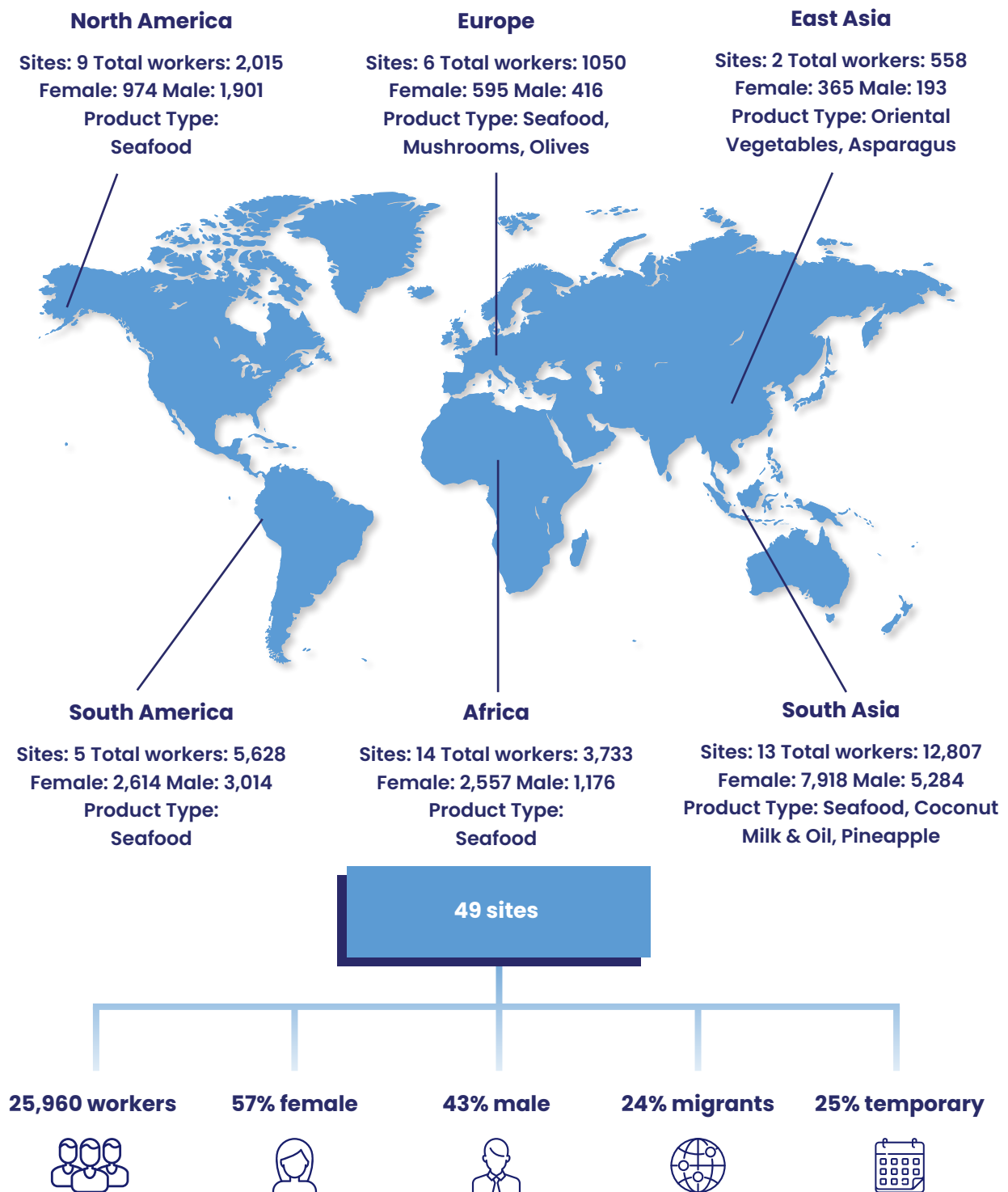
Governance and progress monitoring of our work on modern slavery and ethical trade is executed through meetings between our Managing Director, Technical Director, and CSR Department. Our CSR team meets weekly to drive progress against our ethical trading and modern slavery targets.

 **Figure 2: Organisational Structure of Decision Making on Modern Slavery**



2.2 Supply Chain Structure

 *Figure 3: Breakdown of Supply Chain Workforce*



Kingfisher Foods’ goods are primarily sourced from a global supply chain across 15 countries, where we work directly with approved manufacturing partners who process and pack food items in controlled and regulated facilities. These are selected based on their ability to meet our specifications, food safety and quality standards, and relevant legal and ethical requirements. Once produced and packed, goods are transported via sea freight to the UK, received at port, and stored at our BRCGS AA-certified warehouse in Liverpool for onward distribution.

Our service supply chains include UK-based logistics, port handling, storage, and administrative services delivered by third-party providers. At present, our visibility is focused on direct (Tier 1) suppliers for both goods and services, and we are developing plans to increase oversight of indirect suppliers and recruitment practices further down the chain in line with evolving industry best-practice.

Kingfisher Foods CSR Department have currently defined product sourcing Tiers as follows:

Tier 1	Primary processors
Tier 2	Raw material suppliers
Tier 3	Raw material processors
Tier 4	Farm & vessel level

We understand that this tier structure varies per product type, therefore this structure provides insight into the majority of our supply chains. Due to the nature of our business, we have broken down our product ingredients into Primary, Secondary, & Tertiary ingredients (where applicable). In the case of a can of Tuna Chunks in Springwater:

Primary Ingredient	Tuna
Secondary Ingredient	Springwater
Tertiary Ingredient	N/A

We currently have 100% visibility down to Tier 4 for all seafood primary ingredients, and 100% Tier 1 supply chain mapping for our entire product range.

Kingfisher Foods establishes supply chain insights through a variety of sources:

- Third-party ethical audit reports e.g. SMETA and BSCI.
- Supplier Self-Assessment Questionnaires (SAQs) on social monitoring platforms such as Sedex and amfori BSCI.
- Internal operational information, including product traceability systems.
- Direct engagement with supply chain stakeholders, including our supplier contacts.
- External traceability software platforms such as Authenticate.

3. Organisational Policies

Kingfisher Foods has a number of policies in place which work together to tackle the multi-faceted aspects of modern slavery and exploitation, whilst bettering health and safety standards and worker well-being. The applicable policies are clearly articulated to both suppliers and employees, and are signed and stamped upon commencement of trade. All policies are reviewed on an annual basis and re-shared with suppliers with any amendments made.

Kingfisher Foods Ethical Trade Code of Conduct

Sets a baseline standard for suppliers to Kingfisher Foods to meet, covering the principles outlined in the Ethical Trading Initiative (ETI) Base Code.

In 2024, the code was updated to provide clear understanding of Kingfisher Foods requirements, and enables Kingfisher Foods to conduct CSR audits against the code.

Kingfisher Foods Ethical Trade Policy

Requires all suppliers, existing and prospective, to be a member of an approved ethical audit platform (Sedex or amfori BSCI) and comply with the ETI Base Code. ETI is primarily aligned with the UN Guiding Principles on Business and Human Rights (UNGPs).

Suppliers are additionally required to have an active ethical audit. These audits allow us to examine good labour practices amongst all suppliers throughout trade.

Fishing and Supply Vessel Code of Conduct

Requires suppliers to promote and maintain fundamental human rights and good working conditions across the fleets that they source from.

Tuna Sourcing Policy

Requires our tuna suppliers to increase transparency on the vessels that Kingfisher Foods source from. By maintaining an accurate vessel list at all times, we have established a traceability system that allows us to check working standards (specifically forced labour) on vessels annually. This policy was additionally written to align our tuna sourcing with our International Seafood Sustainability Foundation (ISSF) membership commitments. Within our policy and given the concerns raised in the past few years, we also prohibit sourcing from Chinese flagged and owned vessels. The Tuna Sourcing Policy states that all vessels should work toward meeting the ILO C188 Work in Fishing Convention.

Supply Chain Equal Opportunity and Inclusion Policy

Clarifies and communicates our position on equal opportunity and inclusion within our supply chain.



Modern Slavery Whistleblowing Policy

To provide guidance and instruction to Kingfisher Foods employees on how to report and manage concerns regarding slavery in the workplace or supply chains should any arise.

Over the past year we have continued to improve our ethical due diligence by ensuring our Modern Slavery policies outlined above are being adhered to within our supply chain. We have exhibited this through ethical visits, with all supplier sites having an active third-party ethical audit.

For more information on our public-facing policies, please visit:
<https://kingfisherfoods.co.uk/sustainability/>

4. Risk Assessment, Prevention and Mitigation

Kingfisher Foods has a robust process in place to measure, monitor and prevent the risk of modern slavery within our supply chains, ensuring working conditions are continuously improving year on year. We have prioritised identifying and monitoring this risk, which has been made possible through our long standing and collaborative relationships with suppliers.

4.1 Assessing Risk

We are committed to continually formalising our risk assessment process. Our approach to assessing risk within our complex supply network is driven through incorporating data sources at all levels of the supply chain.

The first step of our risk assessment is to identify suppliers' 'inherent risk'. We use Sedex's RADAR tool to provide an understanding of human rights risks at a country and sector level. This is combined with our own understanding of supplier-specific inherent risks, which comes through the enhanced Sedex 'Self-Assessment Questionnaire' (SAQ) and learning from our supply partners and their teams on the ground. Our assessment considers the additional risks associated with high-risk types of labour (seasonal, permanent, agency, migrant).

Once the inherent risk is identified, we evaluate how successfully suppliers manage these risks through third-party ethical audits, and site visits by Kingfisher Foods' CSR Department. In 2022/23, we achieved 100% coverage of our suppliers in third party ethical audits, which has been maintained since (Table 2).

Additionally, by looking at the type of non-conformances that were raised by region more closely, we have been able to classify the most common risk areas that exist at supplier sites. These include; health and safety, working hours, and fair wages. By viewing these risks on a global scale (Table 1), we are able to prioritise specific labour rights risks accordingly in addition to supplier specific risks.

We also incorporate open-source data and supplier knowledge to assess risk further down our supply chain. As further due diligence, we worked directly with the Seafood Ethics Action Alliance (SEA Alliance) to develop a Human Rights Risk Assessment tool, which evaluates wild capture fisheries that are supplying to the UK on human rights risks using publicly available data to create a baseline assessment. Upon public release, we incorporated this tool into our risk assessment procedure to assess human rights risks in wild capture fisheries.

In 2023/24, we began mapping and risk assessing our supplying coconut farms. Our risk assessment is based upon location, management systems, length of the supply chain and known human rights risks. In 2024/25 we continued mapping coconut farms for newly on-boarded coconut suppliers, and conducted additional due diligence around the prevention of monkey-labour on these farms.

We additionally committed to mapping the origin of packaging and ingredients for all products. By understanding the country of origin, we can identify country and industry specific risks, devising where due diligence is required. In 2023/24, we mapped the origin of all packaging components, identifying gaps in our current data collection. In 2024/25, we reviewed options for improving data collection and we enhanced consistency of packaging origin visibility. In 2025/26, we aim to risk assess our packaging and ingredients for all products.

In summary, we have conducted our internal risk assessment process for the origin of our primary ingredients, combining suppliers’ inherent risks, performance, and fishery, farm and production specific risks. Using these risk factors, we have generated risk scores for all Tier 1 suppliers, displayed in a risk-based comparison matrix, highlighting key target areas for improvement and additional due diligence. Our risk assessment process is reviewed and conducted by the CSR team on a 6-monthly basis.

Table 1: Regional Non-Compliances Raised Within Audits 2024/25

Region	Total No. of Non Compliances Raised in Audits 2024/25	Top 3 Non-Compliance Areas
East Asia	23	Health & Safety, Management Systems, Social Benefits
South Asia	29	Health & Safety, Working Hours, Management Systems
South America	38	Health & Safety, Management Systems, Fair Remuneration
North America	7	Health & Safety, Working Hours, Rest Days
Europe	16	Health & Safety, Discrimination, Environment
Africa	30	Health & Safety, Management Systems, Workers Protection

4.2 Managing and Mitigating Risk

To monitor our first-tier suppliers, we require annual SMETA, or BSCI third party audits to independently verify labour conditions at factory level. In 2021, we published our first set of ethical KPIs so that we could benchmark our progress year-on-year (Table 2). We aimed to increase third-party audit coverage and to reduce the number of non-compliances raised per audit by providing on-going supplier specific support. From 2023/24, we added an additional KPI for number of non-conformances closed, strengthening our commitment to continuous improvement, ensuring that any identified issues are promptly addressed and resolved, leading to safer and more ethical supply chains.

Table 2: Kingfisher Foods Key Performance Indicators 2024/25

Financial Year	2020/21	2021/22	2022/23	2023/24	2024/25
Total Supplier Sites	53	56	54	40	44
% of suppliers completed the updated SAQ	100%	100%	100%	100%	100%
% of high/medium risk sites audited	89%	98%	100%	100%	100%
% of sites with valid ethical audit	80%	98%	100%	100%	100%
Number of Non-Compliances Raised	192	228	271	112	160
Number of Non-Compliances Closed	N/A	N/A	N/A	84	116

With the aim of building knowledge to strengthen supplier support, the CSR team completed the following training workshops during 2024/25:

‘Stronger Together’

Tackling Modern Slavery in Businesses UK and ROI
Effective Human Rights Due Diligence
Advanced Modern Slavery Training

‘Responsible Recruitment Toolkit’

Introduction to Responsible Recruitment
Labour Supply Chain Due Diligence and Partnerships
Eliminating Worker-Paid Recruitment Fees

These learnings have enabled us to provide more refined and impactful guidance to remediate non-compliances and thus strengthen supplier support. In addition, this engagement provides the opportunity for the CSR team to engage in collaborative peer-learning, and to gain further best-practice insights to carry forwards.




Through developing our risk assessment process, we have been able to better visualise and map risk as a whole across our supply chain. Since 2021/22, we have put our resources into expanding our ethical audit programme, so that our risk assessment process covers the entire supply chain, achieving 100% third-party ethical audit coverage since 2023.

We have identified a high percentage of migrant recruitment in South Asia within the seafood sector through our internal risk assessment of our processing supply base. We recognise the risks associated with migrant labour and recruitment in this region, and have highlighted this as a key focus area for us to develop further due diligence in worker recruitment pathways.

4.3 External Engagement

In 2024/25, we continued our wider pre-competitive work, enabling us to increase leverage influence across our supply chains where a combined commercial force is most effective. The multi-stakeholder initiatives we engage in concentrate on two key areas: the provision on workers' rights and due diligence at sea. With a renewed focus on stakeholder engagement, we were able to participate in more pre-competitive forums.

Table 3: Partnership Project Initiatives

Member or Partner	Project or Initiative	Purpose
 	<p>Seafood Ethics Action Alliance (SEAA) Responsible Recruitment Working Group</p> <p>SEAA Human Rights Due Diligence (HRDD) Working Group</p>	<p>Both groups, run by Seafish, focus specifically on the provision of human rights both at sea, and in the seafood processing sector.</p> <p>We work collaboratively on developing a shared work plan to improve working conditions and recruitment practices in the global fishing and seafood sectors.</p> <p>We funded the development of a human rights risk assessment tool and worked towards its completion in the SEAA HRDD Working Group. We actively use this risk assessment tool as part of our internal process, regularly updating sources where necessary.</p>
	<p>Global Tuna Alliance (GTA) Responsible Fisheries Management Organisation (RFMO) Working Group.</p>	<p>The aim of the working group is to align international businesses' advocacy ahead of Tuna RFMOs annual meetings. This includes requesting increased observer coverage on-board vessels, vessel monitoring systems, and public vessel databases.</p>

5. Due Diligence Processes

In 2024/25 we continued to integrate knowledge of modern slavery within Kingfisher Foods, upholding the integration of ethical conditions within the contract approval process. Awareness of the risks of modern slavery within our supply chain continues to be sustained through: induction training covering internal approval processes and traceability at Kingfisher Foods, and specific modern slavery training.

With site visits being a key part of our approach, our CSR team performed an ethical due diligence visit to a high-risk tuna supplier in 2024/25. This visit was conducted to understand worker experiences at the site first-hand through worker interviews, carrying out our own human rights evaluation – supplementary to required third-party ethical audits – as laid out in our Ethical Trade Policy.

The CSR Department conducted an online audit of high-risk suppliers in 2022/23 to evaluate the effectiveness of Kingfisher Foods' monitoring systems and to ensure compliance to Kingfisher Foods and customer requirements. From this audit, we identified that the Kingfisher Foods Ethical Trade Code of Conduct lacked specific clauses, meaning that measuring supplier compliance was difficult. In response, we redeveloped our Code of Conduct to include 45 clearly defined requirements. In 2023/24, we conducted a virtual pilot to assess effectiveness, finding that suppliers better understand the new requirements and making auditing more efficient and effective. In 2024/25, we set the target to conduct an in-person audit of a high-risk supplier against the code – this is planned to be conducted by the end of 2025.

Although the day-to-day management of ethical trade at Kingfisher Foods comes under the responsibility of the CSR Department, we recognise the need for company-wide participation in preventing modern slavery within our supply chain.

Therefore, as part of our induction process, all staff are required to participate in our in-house CSR training which highlights potential labour rights issues within our supply chain and how their specific roles can impact working conditions at our supplier sites.

The CSR team also developed and deliver annual, face-to-face Modern Slavery Training to all employees of Kingfisher Foods, including the Commercial & Procurement teams. This training covers:

- Introduction to modern slavery and its definitions;
- Top risk areas for monitoring signs of modern slavery in Kingfisher Foods' supply chains (including case studies) – Fishing; Farming; Processing; Warehousing;
- Kingfisher Foods human rights due diligence processes;
- How employee roles can impact working conditions at supplier sites;
- How to spot the signs of modern slavery;
- Specific guidance on following our Modern Slavery Whistleblowing Policy to ensure staff are aware of how they can safely raise concerns about modern slavery.

The objectives and outcomes of the training are:

- Raise awareness of risks and occurrences of modern slavery in the wider industry;
- Kingfisher Foods employees equipped with the knowledge and ability to identify risks of modern slavery during supplier site visits;
- Responsible purchasing guidance for Sales & Procurement teams;

Our internal Modern Slavery Training is reviewed and updated annually in line with current industry best-practice, as well as any updates on specific case studies from our supply chains.

In addition, the CSR team developed and distributed the 'Modern Slavery, Ethics and Sustainability Factsheets' to all staff, and provided training on how to use them.

In 2024/25, Kingfisher Foods piloted a third-party worker voice project with ES3G called 'Ask The Workers'. The intention of this project was to go 'beyond audit' and understand worker experiences, working conditions, and overall workforce treatment first-hand. This was done using live data submitted through smartphone application software, gathered through survey responses directly from workers, based on core components of the ETI Base Code. The supplier and Kingfisher Foods have visibility of live responses, and can instantly assess and evaluate data trends, meaning targeted approaches to remediation can occur with greater efficiency. This is an initiative we plan to integrate into our overall human rights due diligence approach moving forward.

6. Effective Action to Address Modern Slavery

6.1 Progression of 2024/25 Targets

Over the next 12 months, we will build on the progress made so far in managing the risk of modern slavery in our supply chains. We have outlined below the specific steps taken during the past financial year:

Table 4: Progression of 2024/25 Targets

24/25 Target	Definition	Status	Comments
Strengthening Supplier Support	Develop a CSR Compliance Procedure, aiming to share Kingfisher Foods and customer policies in a clear and efficient manner. This will ensure that suppliers can have a better understanding of requirements.	Completed	Through the implementation of our CSR Compliance Procedure, Kingfisher Foods maintains a stronger level of enforcement of both Kingfisher Foods and customer policies.
	Add a requirement to the Kingfisher Foods Ethical Trade Code of Conduct, prohibiting Recruitment Fees in Kingfisher Foods supply chains.	Completed	In addition to updating our Ethical Trade Code of Conduct with this added clause around recruitment fees, we have formulated a Kingfisher Foods Migrant Labour Policy, further addressing recruitment risks associated with migrant workers.
Enhancing Internal Awareness	On an annual basis, update and deliver the Modern Slavery training, enabling all employees to understand Modern Slavery, spot the signs and know how to report concerns.	Completed & ongoing	The Modern Slavery Training has been updated with real-time case studies within the business, increasing awareness through contextualising into relevant scenarios.
Improving Risk Mapping	In 2024/25, we will update the Kingfisher Foods Product Master Specification to standardise the level of data provided by suppliers. We will also include additional questions to better support our internal risk assessment. We will begin using the updated Master Specification for products in 2025, to begin risk assessment in 2026.	Completed & ongoing	Our Product Master Specification includes all of the questions required to support our internal risk assessment for our packaging. This Product Master Specification is now in use, meaning that we are on track to include packaging into our risk assessment in 2026.
	To continue mapping and risk assessing all farms, we will map and risk assess all Chinese farms in 2024/25.	In progress	We have continued to risk assess through mapping our Coconut farms and continue to do so for all of our agricultural products.

Table 4: Progression of 2024/25 Targets (continued)

Target	Definition	Status	Comments
Increasing Due Diligence	Develop a Purchasing Policy to outline the requirements for our procurement team. This is to ensure that the sourcing of products is from suppliers who have been internally approved across a number of areas, including an assessment of their ethical trade credentials and level of transparency.	In progress	The ethical trade credentials are reviewed upon the onboarding of any new supplier partnerships to confirm alignment with both Kingfisher Foods and our Customers' requirements. Purchasing Practices is also incorporated into the annual Kingfisher Foods Modern Slavery Training internally, which the Procurement and Sales department are included in.
	Partner with ES3G to receive direct worker feedback from a high-risk supplier.	Completed & ongoing	This partnership went ahead with further information being included in Section 5: Due Diligence Processes. This provided huge insights into a worker voice-led Grievance Mechanism approach and is one we plan to continue incorporating across our supply chain.
	Using the updated Ethical Trade Code of Conduct, we aim to conduct an in-person audit of a high-risk supplier.	In progress	An in-person audit of a high-risk supplier is proposed to take place by the end of 2025. This supplier has been selected through our Risk Assessment process, and to further implement the ES3G worker voice project.
	Using the SEA Alliance Human Rights Risk Assessment Tool, we have identified high-risk source fisheries. In 2024, we aim to have vessels audited in a key high-risk supply chain.	In progress	As part of our membership commitments to the ISSF, all large-scale purse seine vessels in our supply chain are audited externally by MRAG Americas – a third-party audit company. These include auditing against transshipment at sea and observer coverage on-board vessels: these factors help to monitor risk of modern slavery onboard fishing vessels.

6.2 Targets for 2025/26

Over the next 12 months we will continue to strengthen our approach to managing the risk of modern slavery within our business and supply chain and ensure our strategy is responsive to changing risks. Our targets for 2025/26 are detailed below (Table 5):

Table 5: Targets for 2025/26

Strengthening Supplier Support
<ul style="list-style-type: none">• Develop a remediation approach, based off the Walk Free Modern Slavery Response & Remedy Framework. This is planned to be implemented by the end of 2026.• Implement Migrant Labour Policy to promote responsible recruitment practices, strengthening ethical recruitment for workers in our supply chain in 2025/26.
Enhancing Internal Awareness
<ul style="list-style-type: none">• Purchasing practices policy to be developed, reviewed, and implemented as part of the 2026 annual policy review.
Improving Risk Mapping
<ul style="list-style-type: none">• We plan to engage and map all of our Tier 1 suppliers on the Open Supply Hub by 2028.• Improve and maintain our internal risk assessment on a 6-monthly ongoing basis using the most up-to-date industry resources.• In 2025/26, we plan to improve visibility of recruitment corridors in our supply chain, allowing further development of our supplier risk assessment in this area.
Increasing Due Diligence
<ul style="list-style-type: none">• We plan to further roll-out the ES3G worker voice project, covering 25% of our most at-risk Tier 1 suppliers by 2028.• Improve monitoring and evaluation of targets with internal and external stakeholder engagement, and time-bound commitments through 2025/26.• Develop clear KPIs for 2030 to use for ongoing target monitoring and have these in place for use by 2025/26.

As outlined above, Kingfisher Foods is diligently engaged with eradicating the risk of modern slavery from our supply chains. However, we recognise that ethical issues are not static, requiring us to continuously improve our efforts.

Contact Information

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At Kingfisher Foods, we recognise our responsibility to source products with respect for the environment and people, and we take pride in our proactive approach. Responsible sourcing is an ongoing process, not an end point; thus, we welcome the opportunity to report yearly on our progress in accordance with Section 54(1) of the Modern Slavery Act 2015. This statement containing our commitments and future targets towards strengthening our response to tackling modern slavery is endorsed by our Managing Director and approved by our Board of Directors.

Signed:



John Sexton
Managing Director

September 2025



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