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Modern Slavery Statement 2025

**Associated
British Foods
plc**

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

This statement was approved by the Board of ABF on 29 October 2025.

Relevant entities include but are not limited to: AB Agri Limited; AB World Foods Limited; ABF Grain Products Limited; Allied Mills Limited; British Sugar plc; Cereform Limited; Primark Limited; Primark Stores Limited; R. Twining and Company Limited; and Vivergo Fuels Limited. Several Group businesses, including some not within the scope of the UK Modern Slavery Act 2015, also publish separate or supplemental modern slavery statements. For a full list of ABF subsidiary undertakings, please see note 29 of the notes to our financial statements in our 2025 Annual Report and Accounts.

Introduction

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

As a Group with international businesses operating in 56 countries and with far-reaching complex supply chains, we recognise the important role we can play in addressing the risks of modern slavery. We expect our businesses to carry out due diligence on the risks of modern slavery in their own operations and supply chains and also to provide remediation to those who have been impacted, where this is appropriate. We expect our businesses to apply the principles set out in our Group Supplier Code of Conduct, including our zero tolerance of forced labour and modern slavery, and some of them do this through their own equivalent supplier codes of conduct. Please see our Group Supplier Code of Conduct for more information.

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

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

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

1. International Labour Organization, Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (September 2022)

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Governance and accountability

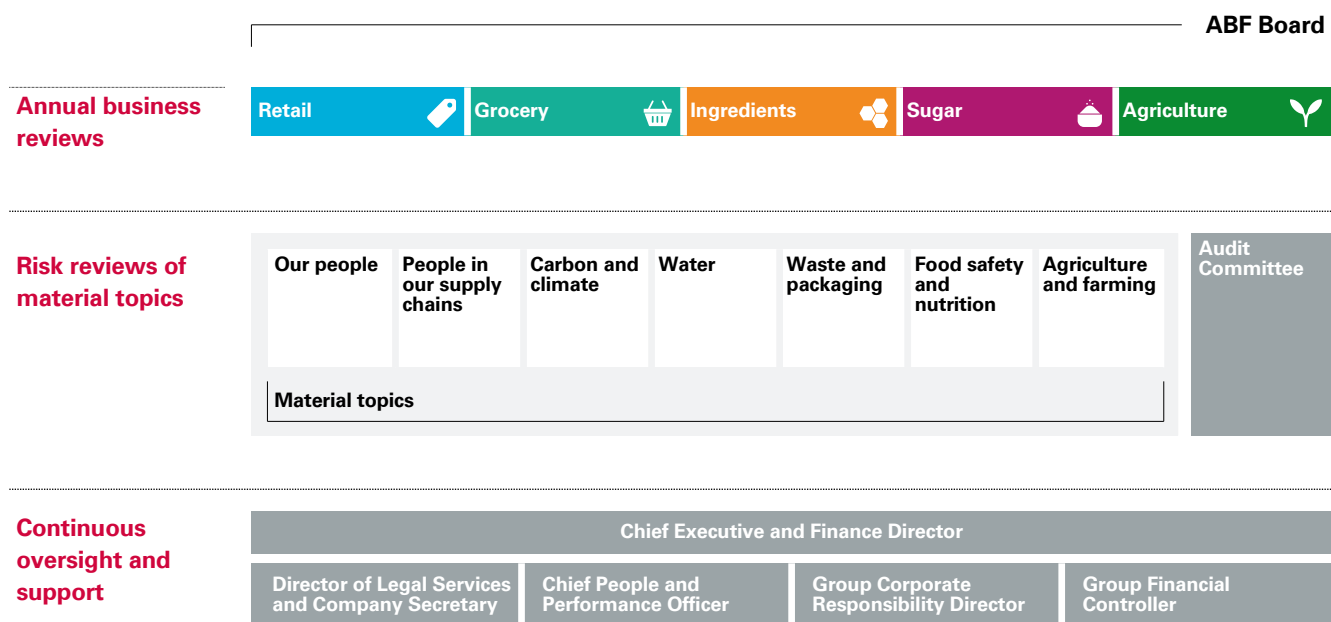
ABF is a diversified international food, ingredients and retail group with revenues of £19.5 billion, 138,000 employees and operations in 56 countries across Europe, Africa, the Americas, Asia and Australia. We operate a devolved operating model across our five business segments of Retail, Grocery, Ingredients, Sugar and Agriculture.

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

Each business has its own approach to risk management and submits its own annual review of those risks to the Board of ABF. You can read more about our Group ESG governance and Group approach to risk management in our 2025 Annual Report and on our website.

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

Our governance framework chart



Support for legislation

Our businesses operate in a landscape where global policy and legislation on human rights, and particularly in relation to the risk of forced labour, is shifting and evolving rapidly. Supporting our businesses as they prepare to meet new legislative requirements is essential and built into our approach.

Globally, laws to address modern slavery have been significantly strengthened.

In addition to the UK Modern Slavery Act 2015, Australia's Modern Slavery Act 2018 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023), several other important legal developments have emerged that address modern slavery and forced labour. These include the US Uyghur Forced Labor Prevention Act and the EU Forced Labour Regulation.

Additionally, there are broader legislative initiatives on responsible business conduct, reporting and due diligence, including the EU Corporate Sustainability Reporting Directive, the EU Corporate Sustainability Due Diligence Directive, the EU Deforestation Regulation, the German Supply Chain Act, and the French Corporate Duty of Vigilance Law.

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

In March 2025, the UK Government published updated statutory guidance relating to section 54 of the UK Modern Slavery Act 2015, which requires commercial businesses who operate in the UK and have a turnover of £36m or more to prepare an annual modern slavery statement. To ensure the updated guidance is practical and applicable across sectors, the Home Office established a Forced Labour Forum, including representatives from government, civil society organisations, businesses and academics to steer the update. A representative from ABF participated in the Forum.

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Embedding responsible business conduct in policy and management

Our Group Supplier Code of Conduct covers the following principles:

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

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

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

We are also aware that the signs of forced labour can be manifested through a range of factors. The International Labour Organization (ILO) lists 11 forced labour indicators². Forced labour may be the result of one single indicator, or a combination of multiple indicators.

Business updates

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

- Primark and Twinings Ovaltine both have standalone human rights policies, and this year ABF Sugar launched its own too. These policies outline their approach to human rights due diligence in their supply chains.
- AB Agri has a Responsible Sourcing Policy and internal Responsible Sourcing Standards which apply to all its businesses. The Policy outlines areas of focus, including human and labour rights. It also explains the roles and responsibilities of its businesses and their employees. The Responsible Sourcing Standards, based on the Group Supplier Code of Conduct and the Ethical Trading Initiative Base Code, describe the sourcing approach and processes required for different sourcing categories.
- Westmill, Jordans Dorset Ryvita and Allied Milling and Baking each have an internal Preventing Hidden Labour Exploitation Policy to support the recruitment and employment of permanent and temporary agency employees across their own operations. This internal document was drafted in accordance with guidance from Stronger Together, an expert independent organisation that provides businesses with training, resources and collaborative programmes on responsible recruitment to prevent labour exploitation within supply chains.

It is important that workers, and those most at risk of modern slavery, can access relevant policies and understand their rights within the workplace. They should also have access to an effective grievance mechanism. Primark's Supplier Code of Conduct has been translated into 45 languages spoken by workers in its supply chain. All of Primark's suppliers' tier one factories are required to display its Supplier Code of Conduct in the local language in the workplace.

2. International Labour Organization, ILO Indicators for Forced Labour

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Identifying actual and potential harms

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

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

To achieve this, businesses employ a range of credible external and internal resources, alongside meaningful stakeholder engagement. This may include consultation with affected communities, workers' representatives, and other relevant stakeholders to ensure a comprehensive understanding of risks and their impacts.

External resources used include Verisk Maplecroft’s risk assessment tool, which provides country risk data for 150 commodities, and information from the Sedex (Supplier Ethical Data Exchange) online database. Additionally, businesses refer to industry bodies such as AIM-Progress, in-depth site and supply chain audits, assessment, investigations and stakeholder reports including those from intergovernmental organisations, civil society and human rights watchdogs. Intelligence gathered from teams in our businesses’ operations and sourcing locations further supports these efforts.

As a Group, we facilitate the sharing of information through our Corporate Responsibility Leads network, which brings together representatives from across our businesses to discuss cross-divisional and critical issues.

Business updates

AB Agri identifies human and labour rights risks for certain raw materials using the Verisk Maplecroft global risk analysis tool and the Sedex online database. By engaging directly with its direct suppliers, AB Agri has mapped the country of origin for over 95% of its raw material supplier base. AB Agri also conducted a review of contracted labour used across its manufacturing sites globally. It has also assessed all its third-party manufacturers using a set of critical factors to evaluate risk levels.

Primark does not own any factories. Primark takes a risk-based, worker-centric approach to human rights due diligence that makes use of multiple channels of information to set priorities and manage risk within its supply chain. This includes desk-based research, audits, direct engagement with workers and their representatives, as well as engagement in local and international forums. Primark greatly values engagement with a global network of local and international stakeholders, trade unions, governments and civil society organisations, whose support and feedback are essential to its progress.

Primark’s Ethical Trade and Environmental Sustainability team has over 130 people in its 10 key sourcing markets.The work of the team ranges from risk assessment to supporting suppliers and their factories in implementing its Supplier Code of Conduct.

Primark’s social audit and monitoring programme is one of the key elements of how human rights due diligence is implemented in its product supply chains. Through this programme, Primark conducted over 2,400 social audits over the calendar year 2024. These audits are carried out by Primark employees based in their key sourcing countries, in addition to carefully selected third parties. Primark carries the full cost of these audits, which includes rigorous checks for human rights issues based on first-hand assessment of the working environment, reviews of relevant documentation and confidential worker interviews. At the end of each audit, supplier factories are issued with a time bound corrective action plan that outlines any areas for improvement. Primark uses these audits in the approval process for all new tier one factories making Primark product. Any potential new factories are audited and only if the outcome of the audit is satisfactory can any orders be placed.

The global sugarcane industry is particularly vulnerable to human rights related risks due to its reliance on labour intensive and seasonal activities such as weeding, planting, cane cutting and harvesting. ABF Sugar recognises that its long-term success relies on upholding the respect and dignity of its workforce, supply chain workers and communities. The division uses the ILO’s Decent Work Agenda to guide its operations, which includes paying fair wages, providing safe working conditions and promoting dignity and equality. In 2024/25, in response to evolving regulatory requirements, the ABF Sugar businesses initiated a review of social impacts in their operations, supply chains and community activities. This assessment, guided by a risk-based approach, identified opportunities for improvement. ABF Sugar is working at a divisional level to support its businesses to address these findings, including by developing a Human Rights Due Diligence Framework template that could be implemented by its businesses. These findings form part of the businesses’ five-year plan priorities. Each business has appointed a Single Point of Contact for Human Rights to lead and develop the Human Rights action plan for the businesses.

Grocery Group businesses are prioritising their efforts to monitor human and labour rights risks by focusing on specific value chains where the Group perceives the risks to workers to be highest. These selected categories include raw materials, packaging, finished goods and services (including security, cleaning workwear, temporary labour and logistics providers). Risks are assessed through the Sedex online database for in-scope Tier one and key Tier two supplier sites in these categories. A central data management team continues to track in-scope supplier engagement and shares monthly reports with procurement and responsibility teams. These reports inform sourcing decisions and provide information on non-conformances identified during audits, allowing the businesses to work with suppliers to resolve issues effectively and promptly

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The Grocery Group requires Tier one and Tier two suppliers of raw materials and other key commodities to complete a self-assessment questionnaire. Completion rates have remained at 90% in 2024/25, following an increase from 60% in 2023/24, despite changes to the questionnaire, reflecting strong ongoing engagement from suppliers. Subsequently, in-scope suppliers are required to upload the results of all respective ethical audits conducted onto the Sedex platform. Any non-conformances identified are escalated to the Grocery Group Corporate Responsibility Leads as well as technical and procurement contacts within the relevant businesses. They then follow internal escalation and corrective action processes, with suppliers engaged to cease, prevent or mitigate the issues raised. All identified issues are continuously monitored and reviewed to support ongoing improvement.

AB World Foods and Westmill Foods both have significant supply chain linkages to Asia, and since 2023 they have engaged a specialist ethical sourcing manager for the region and agreed a specific work programme to help facilitate supply chain risk assessment and management programmes in India, Pakistan and Thailand.

Twinings Ovaltine has controls and processes in place to assess and mitigate human and labour rights risks across its global supply chain. It continues to develop its due diligence approach, including audit procedures and training to support the implementation of its Code of Conduct and Human Rights Policy. These include its Factory Monitoring and Improvement Programme (FMIP), the Twinings Community Needs Assessment (TCNA) programme and Modern Slavery Awareness training.

FMIP covers Twinings’ own operations as well as its tier one suppliers sites, including third-party manufacturers (e.g. co-manufacturers, licensing), warehouses, packaging, raw materials processors, branded items for promotion, as well as construction services at their own sites. Each site is risk assessed, taking into account country, products, labour rights risk and the importance of the supplier to the business. All high-risk suppliers, defined as those with significant potential for human rights and labour issues, as well as being significant suppliers to our business, are audited by an independent third party. Based on their findings and requirements, high-risk sites are re-audited at least every three years, or sooner to check the required action has been completed. Sites assessed as medium- or low-risk are subject to ad hoc semi-announced spot checks, where suppliers are given a two-week window in which the spot check will be conducted. Where non-compliances are identified, suppliers are required to take action to resolve the issues, within a specified time frame. This year, Twinings completed a comprehensive review of its FMIP audit framework against Lloyd’s Register Quality Assurance (LRQA) standards and Sedex’s SMETA (Sedex Members Ethical Trade Audit) 7.0 Framework, updating its materials and process where required, including developing a bespoke foreign migrant worker assessment tool.

In its tea and herb supply chains, Twinings Ovaltine is committed to understanding and, where possible, addressing the needs of the communities from which it sources. It purchases tea only from Rainforest Alliance certified gardens, and complements this with its own Twinings Community Needs Assessment (TCNA) across tea gardens, estates, farms and key herb suppliers to better understand the issues in its tea and herb supply chains.To strengthen its approach to monitoring its supply chain, it is moving to an annual risk-based approach cycle. It will carry out a full TCNA in year one, which is repeated in year two for high-risk sites, and for lower-risk sites, it will carry out a follow-up visit to focus on implementation of the action plan and context-specific risks.

Twinings’ TCNA framework takes a holistic approach to assessing human rights risks and community needs in its supply chain. It focuses on hearing directly from workers, farmers and community members through focus group discussions, interviews, surveys and observations. This provides first-hand insight into the challenges and aspirations of these communities and helps identify areas for improvement.

A TCNA covers issues related to human rights and the welfare of workers in its supply chain such as gender, health and nutrition, children’s rights, livelihoods, water and sanitation, natural resources, farming practices, housing and working conditions. This approach allows Twinings to identify specific issues and develop targeted programmes that help to address the needs of each community.

Business updates

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

<https://www.sourcedwithcare.com/en/our-approach/sourcing-map/>

Primark’s Global Sourcing Map covers tier one factories that represent approximately 98% of its products, and the number and gender of workers at each site. The map is available here.

<https://globalsourcingmap.primark.com/en/>

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Training

With people at the heart of all our businesses, employee training can help raise awareness of issues relating to modern slavery. For a number of years, online training modules have been available across our businesses covering the ABF Group Supplier Code of Conduct – including content on forced labour – and the requirements of the UK Modern Slavery Act 2015. A review of this training content was initiated during the reporting period. Where necessary, updated materials will be introduced to ensure contents remain relevant and aligned with evolving regulatory requirements and best practices.

Many of our businesses have developed their own additional training materials to address specific risks, and partner with Non-Governmental Organisations (NGOs) and other external experts to provide training for suppliers and workers in their supply chains.

Business updates

AB Agri rolled out modern slavery awareness training in 2025 to 107 colleagues who are in roles that involve visiting suppliers or customers or making purchasing decisions, or roles relating to operations within its own sites.

All ABF Sugar head office and business unit staff complete online training every three years, with additional sessions for new starters. This training includes sessions on child labour and forced labour.

ABFI provides an online training module for senior leadership members, as well as other relevant employees in different teams across the businesses, to help them understand the risks of modern slavery within the industry. The objective of this training is to equip its employees with knowledge and tools they can use to identify and address any issues that may arise. This training is conducted on a two-year rolling basis to ensure awareness and understanding is up to date with industry standards.

Twinings Ovaltine has been implementing mandatory virtual modern slavery training for all staff in supplier-facing roles since 2020. The business continues to roll out modern slavery training for tier one supplier factories operating in high-risk countries, with a focus on suppliers assessed to be at high risk of employing migrant workers. The e-learning course is developed by Twinings and suppliers are able to complete the course once they have registered.

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Addressing risks – cease, prevent, mitigate

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

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

As a last resort, companies may disengage responsibly from supply chains and business partners where they cannot prevent or mitigate risks within the supply chain.

Business updates

Grocery Group businesses Jordans Dorset Ryvita, AB World Foods, Allied Bakeries and Speedibake are actively engaged in trying to improve the working conditions of migrant workers in Turkey's agricultural sector. In partnership with the Fair Labor Association (FLA), they are working to address the needs of workers, farmers, and labour intermediaries in the vine fruit and hazelnut sectors.

To drive change, these businesses have implemented a robust framework to evaluate supplier performance against key indicators such as child labour and wages.

Grocery Group employs a specialist in Turkey whose focus is on engaging with suppliers and farmers on both social and environmental matters.

Managing the risk of exposure to forced labour in the Xinjiang Uyghur Autonomous Region (XUAR) of China remains a focus for some of our businesses. While none of Primark's approved supplier factories are located in the XUAR, the business requires suppliers' assurances that no materials or labour originating from the XUAR are used in the supply chains of its product. This is supported by a supply chain mapping platform that is constantly updated. Some of our other businesses have changed the source of raw material inputs due to concern over their origin. In 2025 our Grocery businesses decided to exclude a supplier from a tendering process because it was unable to provide the traceability guarantees required to avoid exposure to risks linked to the region.

Primark's 'My Journey' is a training and awareness programme focused on identifying and addressing the risks of modern slavery and forced labour in the hubs of South India and North India. The programme trains all staff and workers in a factory who are involved in the recruitment and hiring of workers. It helps them understand the potential risks of forced labour involved in these processes, and how they can help to address them, for example, by making sure that all new recruits have contracts that they understand and that they have not paid recruitment fees to secure their job. The programme first launched in 2019 in South India, which is a hub for spinning and fabric mills and many workers migrate there from different regions across India. Workers in this region, both local and domestic migrants, have been identified as vulnerable and at risk of forced labour. Recruitment and hiring practices are a key source of these risks. The programme expanded to include manufacturing hubs in Delhi, North India in 2024. Migratory patterns to this region differ to those of South India, but similar risks of modern slavery and forced labour arising from recruitment practices have been identified.

Primark opened its first store in Kuwait in October 2025 in partnership with the Alshaya Group, a leading retail franchise operator in the Gulf Cooperation Council region, with further stores planned to open in 2026. The Alshaya Group is required to comply with the principles set out in Primark's Supplier Code of Conduct.

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Business updates

The tea sector

Following issues identified in Twinings’ Kenyan tea supply chain in 2023, Twinings developed a Gender Based Violence and Harassment (GBVH) Policy, to help tea gardens effectively prevent and address GBVH, reduce its risks, and ultimately aim to help to protect women workers.

Twinings requires the tea gardens it sources from to sign up to this policy, in addition to its Code of Conduct. Once they have signed, the supplier must submit a self-assessment report of their compliance against the policy and the output from this assessment is verified by a third party or by the Twinings Social Impact & Sustainability team. Where there are non-compliances with the policy, tea producers are given guidance on how to

address these, including through a toolkit of best practices and tailored training. Tea gardens are also expected to formalise their approach on GBVH prevention and ensure continued effort to eliminate it. Twinings continues to roll the policy out, prioritising Kenya, India and Sri Lanka.

Twinings is committed to playing a leading role in developing a progressive and thriving tea and herbs industry, working in close collaboration with others, including the Ethical Tea Partnership (ETP) and its members, to help bring about industry-wide change. To achieve its ambitions, it works with partners on the ground in its key sourcing regions to help address societal and environmental industry-wide issues. Its partners include producers, NGOs, government agencies, industry platforms, as well as the tea and herb growing communities it sources from.

Spotlight on responsible recruitment

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

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

- Primark supports the Employer Pays Principle (EPP), which means that no worker in its supply chain should pay for their job and that any costs associated with their recruitment should be paid for by the employer, as set out in Primark’s Supplier Code of Conduct.
- Primark’s Supplier Code of Conduct permits suppliers to use agency and contract workers, provided they are afforded the full rights set out in the Supplier Code of Conduct. Primark has provided training to suppliers to ensure they are aware of the risks and Primark’s requirements.
- Primark may conduct additional due diligence on suppliers that hire migrant, contract and agency workers. Migrant, contract and agency workers can be more vulnerable to recruitment practices that may result in forced, indentured or bonded labour.
- where Primark has identified that recruitment fees have been paid by workers, it has worked with the supplier(s) with the objective of providing remedy in the form of reimbursement fees to workers.

Primark continues to address the specific challenges faced by vulnerable workers in its supply chain, including domestic migrant workers, particularly in India which is a key sourcing country. Since 2017, Primark’s My Life programme has supported these workers by equipping them with essential life skills, including communication, knowledge of workplace rights, and health practices, with a strong focus on women. Developed in partnership with international NGO Women Win and local NGO Maitrayana, the programme has been adapted over time to meet local needs, including language and cultural barriers. Alongside this, Primark has expanded its efforts to strengthen livelihoods more broadly through financial resilience initiatives. In 2025, these initiatives now reach 28 factories across four countries and cover a wide range of support, from supporting factories to transition to digital wage payments in Cambodia to essential life skills training for workers in India, and supporting access to social insurance in China. These initiatives aim to build long-term stability and reduce vulnerability across the supply chain.

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

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Grievance mechanisms

ABF encourages an open culture in all dealings between employees and people with whom we and our businesses come into contact. Honest communication is essential if malpractice and wrongdoing are to be identified and dealt with effectively. Our Speak Up Policy sets out guidelines for the employees of ABF and its businesses who wish to raise issues in confidence, and on how grievances will be managed. The scope of this Policy includes issues related to modern slavery. We provide an external advisory service for all staff, including casual or agency staff. The Speak Up Policy explains how confidentiality and privacy will be maintained.

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

Primark's Supplier Code of Conduct sets out the expectation that all workers across its supply chain should have access to functioning grievance mechanisms. This includes:

- having grievance mechanisms which allow for anonymous reporting;
- expecting Primark-approved factories to make grievance mechanisms available to their workers;
- where applicable, working with third parties, including Non-Governmental Organisations (NGOs), to support the implementation of industry-wide grievance mechanisms in Primark's sourcing countries. An example is the Amader Kotha Helpline in Bangladesh. Another example is the Hamary Awaj hotline in Pakistan. Both are external and independent grievance mechanisms that provide workers with a confidential and accessible means to raise concerns and access remedy; and
- rolling out a separate, Primark-funded grievance mechanism that will be available to all workers and relevant stakeholders in its supply chain, called Tell Us.

Business updates

Primark also receives grievances through other channels, including the customer services section of its website, confidential worker interviews during social audits and workers having direct contact with Primark colleagues and its partner organisations. When issues or grievances are raised, Primark takes steps to investigate thoroughly while protecting the confidentiality of those raising the complaint, and anyone else who might be affected. Primark does not tolerate any retaliation against those who have raised a grievance and any affected stakeholders.

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Measuring progress

Our businesses develop appropriate measurement for their supply chains and operations and monitor their progress and performance against these as they deem appropriate. Several of our businesses have internal key performance indicators in place in relation to human rights risks, while some report on these through their modern slavery statements. For example, Primark tracks and monitors the following key performance indicators which cover issues related to modern slavery:

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

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

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Communicating

Communicating progress is important if we are to have an impact in addressing modern slavery.

We report on progress and performance on human rights risk across the Group through our website. We share our learnings and communicate on our progress regularly as a Group to our investors and shareholders and respond to requests from stakeholders on specific risks within our businesses' operations and supply chains.

Regulation governing corporate ESG reporting is increasing, and we welcome the introduction of increased measures for company reporting, for example under the UK Modern Slavery Act 2015 and, at an EU level, through the Corporate Sustainability Reporting Directive.

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



Paul Lister
Director of Legal Services and Company Secretary

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

This statement was approved by the Board of Associated British Foods plc on 29 October 2025.

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

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

You can also learn more about our activities and performance on our website.