Modern Slavery Statement 2026

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 during the financial year ending 12 September 2026.

This statement was approved by the Board of ABF on 28 October 2026. 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,Hovis Limited[1]; and Rank Hovis Milling Limited[1]. 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 30 of the notes to our financial statements in our 2026 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 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[2].

As a Group with international businesses operating in 57 countries and with far-reaching complex supply chains, we recognise the important role our businesses 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 depending on their relationship to the impact. 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[3], 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. from its acquisition on 8 July 2026
2. International Labour Organization, Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (September 2022)
3. OECD Due Diligence Guidance for Responsible Business Conduct (February 2018)

Governance and accountability

ABF is a diversified international food, ingredients and retail group with revenues of £19.6bn, 140,000 employees and operations in 57 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.

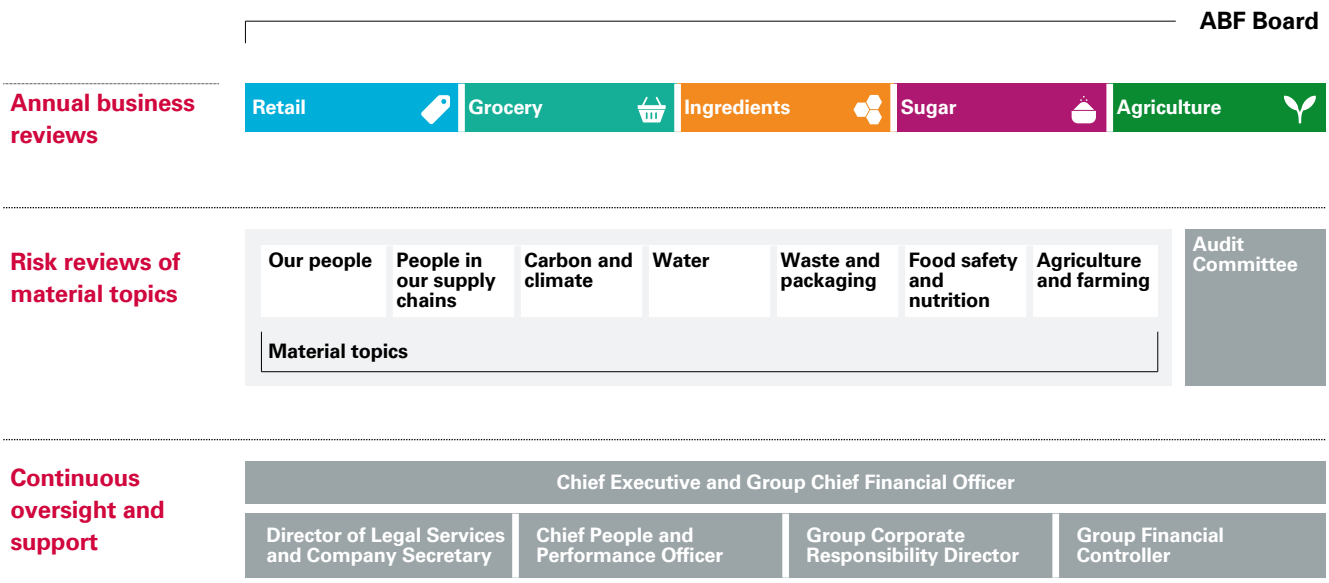
The identification, assessment and management of ESG risks and opportunities resides within the business where the risk or opportunity sits. This is no different to how all other business risks are managed. Annually, risks are collated and reviewed at individual business and divisional level and then, as appropriate, reviewed also at Group level. Businesses incorporate these into their risk registers and their wider ESG strategies as appropriate.

The ABF Board is accountable for effective risk management, for agreeing the principal, including emerging, risks facing the Group and ensuring that these are successfully managed.

You can read more about our Group ESG governance and Group approach to risk management in our 2026 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

The legal and regulatory landscape for human rights and responsible business conduct continues to evolve rapidly. New and emerging legislation adds to the requirement for businesses to identify, prevent and address the risks of forced labour and other adverse human rights impacts across their operations and supply chains. Supporting our businesses in their efforts to understand these requirements, and helping to equip them to respond, forms an important part of our Group approach.

In recent years, governments have introduced a range of measures to strengthen business accountability for modern slavery and forced labour. In addition to the UK Modern Slavery Act 2015, Australia's Modern Slavery Act 2018, the US Uyghur Forced Labour Prevention Act (2020) and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023), significant developments include the EU Forced Labour Regulation, and broader due diligence and reporting requirements such as the EU Corporate Sustainability Reporting Directive (CSRD), the Corporate Sustainability Due Diligence Directive (CSDDD), the German Supply Chain Due Diligence Act and the French Duty of Vigilance Law.

As a global business, we support legislative and policy measures that help prevent modern slavery and strengthen respect for human rights. We continue to monitor legal developments across the jurisdictions in which we operate, support our businesses to prepare for new requirements and share practical insights with policymakers on implementing effective and proportionate due diligence.

In the current reporting period ABF and its business have been involved in various government consultations looking into the regulation of responsible business conduct as well as forced labour bans. These include:

UK

ABF contributed to a baseline assessment of the UK's implementation of the United Nations Guiding Principles on Business and Human Rights, led by the Foreign, Commonwealth and Development Office in collaboration with the Nottingham University Rights Lab.

We also supported the consultation led by the Office for Responsible Business Conduct within the now re-named Department for Business, Innovation, Science and Trade on the feasibility of introducing mandatory human rights due diligence in the UK.

ABF supported the Independent Anti-Slavery Commissioner's work with Omnia and Unseen to prepare model legislative drafting for mandatory human rights due diligence, including the proposed introduction of a forced labour ban.

Through its ongoing membership of the Forced Labour Taskforce, ABF remains engaged in the work of the Home Office on the proposed UK Asylum and Immigration Bill, particularly in relation to the Transparency in Supply Chains provisions of the Modern Slavery Act. We also continue to engage with the Office for Responsible Business Conduct as it progresses a second round of consultation on the potential introduction of mandatory human rights and environmental due diligence in the UK.

European Union

ABF and Primark are members of industry associations that participated in the consultation process for the development of the Corporate Sustainability Due Diligence Directive (CSDDD). Members of these associations were invited to comment on the matters under consultation, with responses submitted as an aggregated view of members' positions.

Australia

George Weston Foods submitted a paper supporting proposals to strengthen the Australian Government's approach to the enforcement of forced labour legislation.

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 indicators[4]. 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 which set out their approach and commitment to human rights due diligence across their supply chains.

In 2026, ABF Sugar's businesses launched their own human rights policy. British Sugar and Azucarera also have a Responsible Procurement Policy to guide supplier engagement and manage social risks.

AB Agri's Responsible Sourcing Policy and its internal Responsible Sourcing Standards apply to all its businesses. The Policy outlines areas of focus, including human and labour rights. It also explains the roles and responsibilities of the businesses and their employees in the procurement process. 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 Cereals, 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. The policy was developed in line with guidance from Stronger Together, an independent organisation that provides businesses with training, resources and collaborative programmes on responsible recruitment to prevent labour exploitation within supply chains.

Primark's Supplier Code of Conduct has been translated into 45 languages spoken by workers in its supply chain. All tier one supplier factories are required to display this Code in relevant local languages in the workplace.

4. International Labour Organization, ILO Indicators for Forced Labour

Identifying actual and potential harms

As a business largely reliant on global agricultural supply chains, many of the raw materials used by our businesses are characterised by a high inherent risk to workers in the sector. Relevant examples include, but are not limited to tea, sugarcane, cocoa, palm oil and cotton. Further, the operations of our supply chains take place in countries where poor enforcement of manufacturing labour standards increases these risks. We also acknowledge the specific vulnerabilities of migrant workers worldwide. Each of our businesses is responsible for identifying and assessing the actual and potential human rights and modern slavery risks within its own operations and its specific supply chains. Some businesses map their operations and supply chains to understand where the most significant risks are likely to occur and prioritise those that are most salient, i.e. those with the most severe negative impact on people.

Risk assessments take account of a range of factors, including country of origin, commodity or product characteristics, industry-specific risks, seasonal labour patterns and workforce characteristics such as the use of migrant or temporary workers. Businesses also seek to understand impacts through meaningful engagement with stakeholders including workers, workers representatives, affected communities, and independent experts.

To support these assessments, our businesses use a range of external and internal sources of information. These include Verisk Maplecroft country and commodity risk data, the Sedex (Supplier Ethical Data Exchange) platform, industry initiatives such as AIM-Progress, independent social audits, investigations and reports from intergovernmental organisations, civil society organisations and human rights groups. In 2026, ABF made LRQA's risk assessment platform, EIQ, available to all its businesses. This platform complements the due diligence tools already used across the Group and provides enhanced analysis of risks to further strengthen risk assessment capabilities. Intelligence gathered by colleagues working in sourcing locations and business operations supports these external sources.

Some businesses also apply additional due diligence measures to regions associated with higher risks of forced labour, with a focus on supply chains where there may be specific challenges in conducting an appropriate level of due diligence on relevant suppliers. Primark supports this approach through a supply chain fibre mapping platform that it updates regularly. Some of our businesses have also changed the source of raw material inputs where concerns existed over provenance or traceability. Others may not decide to proceed with sourcing arrangements where suppliers cannot provide sufficient assurance over the origin of or the risk associated with relevant materials.

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

Business updates

Many of our businesses continue to strengthen their human rights due diligence processes by improving supply chain mapping, risk assessment and monitoring.

AB Agri uses Verisk Maplecroft global risk analysis tool and the Sedex (Supplier Ethical Data Exchange) online database to identify human and labour rights risks linked to certain raw materials. It has mapped the country of origin for over 95% of its raw material supplier base.Based on this information, an initial rating on human and labour rights risks is assigned using the Verisk Maplecroft global risk analysis tool. Certain high-risk raw material suppliers are then required to complete an online Sedex assessment, which is reviewed by the AB Agri ethical compliance team, which subsequently determines whether an on-site audit is required.

ABF Sugar continues to strengthen its understanding of human rights risks within the global sugarcane supply chain, where labour-intensive and seasonal activities can increase vulnerability. Its businesses have completed their yearly assessment of environmental and social impacts in their operations, supply chains and community activities. This assessment, guided by a risk-based approach, identified opportunities for improvement. ABF Sugar continues to work at a divisional level to support its businesses to address these findings, including the development of a Human Rights Due Diligence Framework.

Grocery Group businesses continue to prioritise value chains presenting the greatest potential risk to workers. These include raw materials, packaging, finished goods and services (including security, cleaning workwear, temporary labour and logistics providers).

Supplier risks are assessed through third-party due diligence systems, including Sedex, Sphera Risk and EIQ, alongside supplier self-assessment questionnaires and ethical audits. A central data management team monitors supplier engagement and reports findings to procurement and responsibility teams. Critical non-conformances are escalated through established governance processes and corrective action processes are implemented with suppliers to cease, prevent or mitigate the issues raised as appropriate. All identified issues are continuously monitored and reviewed to support ongoing improvement.

Grocery Group businesses have also strengthened regional expertise by appointing ethical sourcing specialists to support supply chains in Türkiye and Thailand.

Twinings Ovaltine continues to develop its human rights due diligence programme through its Factory Monitoring and Improvement Programme (FMIP), and its Twinings Community Needs Assessment (TCNA) programme. FMIP applies a risk-based approach to assessing own operations and suppliers, with sites categorised according to country, workforce and labour rights risks. Low- and medium-risk sites undergo sample spot checks, while all high-risk sites, defined as those with significant potential for human rights or labour issues, require a semi-announced audit conducted by independent third parties. Twinings Ovaltine uses the Sedex platform, where appropriate, to inform its supply chain assessment process. In 2026, Twinings Ovaltine completed a comprehensive review of its FMIP approach to risk to ensure alignment with industry best practice and emerging legislation, including EU due diligence frameworks. As a result of this review, the division has evolved its approach and processes to place greater emphasis on severity and likelihood of human rights impacts when categorising suppliers, and strengthened its assessments regarding migrant workers. Within its tea and herb supply chains, the TCNA programme provides direct insight from workers, farmers and community members through interviews, surveys and focus groups, helping identify community needs and inform targeted improvement programmes.

Primark takes a 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, Supplier Code of Conduct audits, direct engagement with workers and their representatives, as well as engagement with a global network of local and international stakeholders, unions, governments and civil society organisations. Primark's Ethical Trade and Environmental Sustainability (ETES) team has over 130 people, predominantly based in 10 of its 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 Supplier Code of Conduct audit and monitoring programme is one of the key elements of how human rights due diligence is implemented in its product supply chain. Through this programme, Primark conducted over 2,300 Supplier Code of Conduct audits during the calendar year 2025. Tier one factories are audited at least once a year. These audits are carried out by Primark employees based in sourcing countries or by carefully selected third parties. Primark carries the full cost of these audits. 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[1]. Any potential new factory is audited and, only if the outcome of the audit is satisfactory, can any orders be placed.

With Primark's expansion into the Gulf Cooperation Council region through its franchise partnership this year, the business has extended its supply chain due diligence measures to help identify and provide support to its franchise partner in addressing labour risks.

Supply chain transparency

Twinings and Primark both publish interactive sourcing maps to improve transparency. Twinings publishes a sourcing map on its website detailing the tea gardens it buys from, as well as the countries from which it sources its key herbs, as part of its efforts to drive collaboration and greater transparency of reporting. Primark's Global Sourcing Map covers tier one factories that manufacture finished goods and includes information on site locations and workforce demographics. The map includes established supplier factories that have been producing for Primark for at least one year.

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

Primark: https://globalsourcingmap.primark.com/

1. Tier one: factories manufacturing finished goods.

Training

With people at the heart of all our businesses, training helps our colleagues, suppliers and other business partners identify, prevent and address modern slavery risks. For several years, our businesses have delivered online training modules covering the ABF Group Supplier Code of Conduct, including forced labour, and the requirements of the UK Modern Slavery Act 2015. During the reporting period, we reviewed and updated this training to ensure it continues to reflect evolving regulatory requirements and good practice.

Many of our businesses also develop additional training materials tailored to their specific risk profiles. They work with non-governmental organisations (NGOs) and other external experts to strengthen internal capability and build awareness among suppliers and workers across their supply chains.

Business updates

From the ABF Centre, the Corporate Responsibility (CR) Hub and ESG Legal team developed training to inform the businesses on the European Commission's Guidelines to the EU Forced Labour Regulation. The training was initially delivered to colleagues leading Corporate Responsibility across each of ABF's divisions and business segments. Following requests from several businesses, the training was subsequently delivered to procurement, legal and corporate affairs teams, including those in Primark, ABF Sugar, the Grocery Group and Twinings Ovaltine. In summarising the Guidelines, the training explained the requirements of the Regulation, the concept of forced labour beyond the ILO definition, including the Forced Labour Indicators, and the role of the OECD due diligence framework. It also introduced the EU Forced Labour Single Portal as a practical resource to support implementation and ongoing learning.

AB Agri rolled out modern slavery awareness training in 2026 to 105 colleagues whose roles involve supplier or customer visits, purchasing decisions or operational activities at company sites. The business also includes a modern slavery awareness video in its new starter induction programme. The video explains what modern slavery is, highlights warning signs and sets out how colleagues can report concerns.

ABF Sugar requires all head office and business unit employees to complete online training every three years, with additional sessions for new starters, in-person training for relevant teams and training for grower partners. Topics include child labour, forced labour and workplace safety. In 2026, ABF Sugar supported capability training for its top 30 suppliers. This aims to equip suppliers with essential knowledge and tools for implementing human rights due diligence, including health and safety, climate impacts, working conditions, grievance mechanisms and remediation. The training was implemented in collaboration with AIM Progress, Partner Africa and Quizzr.

ABF Ingredients (ABFI) has 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 relevant issues that may arise.

Twinings Ovaltine has required all employees in supplier-facing roles to complete virtual modern slavery training since 2020. Also, modern slavery training continues to be rolled out for supplier factories operating in high-risk countries, with a focus on suppliers employing migrant workers. The e-learning course is developed by Twinings Ovaltine, and suppliers are able to complete the course once they have registered. Since February 2022, 80 high-risk sites have undertaken modern slavery awareness training.

Addressing risks – cease, prevent, mitigate, remediate

When our businesses identify actual or potential human rights impacts, they take action to cease, prevent or mitigate those risks where appropriate, depending on their relationship to the impact. The actions taken depend on the nature and severity of the issue. Businesses may work with suppliers to implement corrective action plans, strengthen management systems, provide additional training or develop longer-term improvement programmes. Where appropriate, they also seek to provide or support access to remedy for people who have been adversely affected.

Many human rights risks are systemic and require sustained collaboration beyond individual business relationships. Our businesses therefore work with suppliers, governments, industry initiatives, NGOs and worker rights representatives to strengthen working conditions and address the underlying causes of modern slavery and labour exploitation. Where businesses cannot prevent or mitigate serious risks, they may responsibly disengage from suppliers or business partners as a last resort.

Business updates

Grocery Group businesses continue to work collaboratively to improve conditions for migrant workers in Türkiye's agricultural sector. Jordans Dorset Cereals, Ryvita, AB World Foods, Allied Bakeries and Speedibake participate in Collaborative Action Türkiye (CAT), which AIM-Progress now administers to enable businesses to collaborate through an established governance framework. The programme builds on earlier work with the Fair Labor Association (FLA) to address child labour, working conditions, and other labour rights risks across multiple agricultural commodities including hazelnuts, apricots, grapes, figs, and apples. The businesses also employ an ethical sourcing specialist based in Türkiye to work directly with suppliers and farmers on social and environmental issues. Jordans Cereals and Ryvita have strengthened recruitment controls for temporary workers through their Preventing Hidden Labour Exploitation Policy, including the use of licensed labour providers. Recruiter Compliance Principles and enhanced recruitment interviews are designed to identify indicators of labour exploitation.

Following the acquisition of the Hovis businesses in July 2026, a process is underway to integrate elements of the newly formed Hovis Bakeries, where required, into the overall responsible sourcing approach of the Grocery Group. This includes reviewing raw material sourcing for newly-acquired Hovis brands and considering whether to transition certain supply chains away from some higher risk regions to align them with the established sourcing arrangements for our other Grocery businesses, where appropriate.

Specifically, where certain raw material supply chains for Hovis brands were suspected to have links to suppliers in China for which an appropriate level of due diligence had not been conducted, steps were taken to switch sources of these materials to Grocery Group's established supply chains.

George Weston Foods's businesses continue to evolve their approach to human rights in their supply chains. Steps have been taken to reengineer certain supply chains where the required level of due diligence could not be conducted to meet required standards.

AB Agri uses the findings from its human rights risk assessments to engage directly with suppliers and support improvements against its Responsible Sourcing Standards. In 2026, 97% of its raw material suppliers had either received a low-risk rating according to the Verisk Maplecroft evaluation or were actively engaged in ongoing risk mitigation efforts in line with its Responsible Sourcing Standards.

Also this year, working with one of its suppliers, AB Agri facilitated repayments to workers in its supply chain. These repayments were made to migrant workers in respect of recruitment fees and were repaid by their employer.

Twinings Ovaltine introduced a Gender Based Violence and Harassment (GBVH) Policy following issues identified in its Kenyan tea supply chain in 2023 to help tea gardens effectively prevent and address GBVH, reduce risks, and aim to protect women workers. During 2026, Twinings updated this policy and the accompanying supplier guidance. In total, 100% of its tea producers have signed the policy and compliance with it is checked as part of a full TCNA. Suppliers complete self-assessments, which Twinings or independent third parties verify. Where gaps are identified, Twinings provides guidance, practical toolkits and tailored training to support improvement.Twinings also works 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 and industry platforms, as well as the tea and herb growing communities it sources from.

Primark continues to strengthen protections for workers who may face heightened risks of forced labour during recruitment. Its 'My Journey' programme trains factory managers, recruiters and workers in key sourcing regions in India to identify and prevent exploitative recruitment practices, including the charging of recruitment fees and the provision of contracts that workers cannot understand. Primark also adheres to the Employer Pays Principle through its Primark Supplier Code of Conduct and requires employers, rather than workers, to bear recruitment costs. Where investigations identify that workers have paid recruitment fees, Primark works with suppliers to reimburse those costs. If serious human rights risks cannot be addressed, Primark follows its Supply Chain Human Rights Policy and the ACT Responsible Exit Policy when ending supplier relationships.

In addition to its supply chain traceability processes described earlier, Primark sources cotton for its Primark Cotton Project from India, Pakistan and Bangladesh. Recognising the complexity of global cotton supply chains, Primark carries out product testing to help verify the origin of the cotton used in its clothing. This testing continues to support Primark's due diligence and where results fall outside Primark's expectations these are addressed in line with Primark's established processes.

Grievance mechanisms

Effective grievance mechanisms play an important role in identifying, addressing and remediating actual or potential human rights impacts. ABF encourages an open culture across all its businesses, where employees and others can raise concerns without fear of retaliation. Our Speak Up Policy explains how employees and other workers, including casual and agency workers, can raise concerns confidentially, including concerns relating to modern slavery. The Policy also explains how reports are managed and how confidentiality and privacy are protected. We provide an independent external advisory service to support anyone wishing to raise a concern. Several businesses have also implemented additional grievance mechanisms to enable workers and other stakeholders in their supply chains to raise concerns directly where appropriate.

Business updates

Primark believes it is important that organisations, workers and their representatives can raise grievances and alert the business to potential breaches of standards. The business is committed to making grievance mechanisms available to its colleagues and people in its supply chain. 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 NGOs, to support the implementation of industry-wide grievance mechanisms in its sourcing countries. For example, the Amader Kotha Helpline in Bangladesh and the Hamary Awaz hotline in Pakistan are both external and independent grievance mechanisms that provide workers with a confidential and accessible means to raise concerns and access remedy; and
- providing a separate, widely available Primark-funded grievance mechanism for workers in its supply chain, called Tell Us. This began in Bangladesh and has now been extended to suppliers in most sourcing countries, covering both resale and non-resale goods.

Primark also receives grievances through other channels, including the customer services section of its website, confidential worker interviews during Supplier Code of Conduct audits and workers having direct contact with Primark colleagues and its partner organisations. When issues or grievances are raised, Primark investigates 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.

Twinings Ovaltine is committed to working with suppliers and the wider industry to support workers in its global supply chain access effective and trusted grievance mechanisms.

Grievance management and remediation is embedded into its TCNA programme and FMIP, which allows it to assess the current grievance mechanism provisions in its supply chain and identify gaps. To date, most of its suppliers have a grievance mechanism in place but effectiveness and alignment with the UNGPs varies. Twinings Ovaltine is consolidating these findings to inform how it needs to support suppliers in effectively identifying and resolving grievances.

Key elements of its ongoing work include assessing current grievance mechanisms across its global supply chain to assess current coverage, functionality and effectiveness. Twinings Ovaltine will partner with external experts to deliver training for suppliers on what effective grievance mechanisms look like and why they are essential. The ambition is to identify gaps and develop toolkits to support supplier understanding and capability to establish and improve effective grievance mechanisms tailored to local context.

Measuring progress

Measuring the progress of our human rights due diligence helps our businesses understand whether actions taken are reducing risks and improving outcomes for workers. Businesses monitor implementation using a range of qualitative and quantitative measures appropriate to their operations and supply chains. These include supplier assessments, audit findings, corrective action completion, management reporting, stakeholder feedback and internal performance indicators. Businesses use these insights to measure their progress and strengthen their approaches over time.

Business updates

ABF Sugar reviews the findings from its annual ESG and social impact assessments to measure supplier progress and identify opportunities for improvement. The findings inform business priorities and the continued development of its Human Rights Due Diligence Framework.

Grocery Group businesses use supplier engagement data, ethical audit findings and corrective action tracking to measure supplier progress. Procurement and responsibility teams review monthly reports to support ongoing improvement.

Primark uses Monitoring, Evaluation and Learning (MEL) frameworks to measure the outcomes and impact of all its Human Rights Due Diligence focused programmes and projects. Primark also monitors a range of key performance indicators, including Supplier Code of Conduct non-compliances and corrective actions, participation in worker grievance mechanisms and the number of grievances received and resolved, including those relating to modern slavery. During the reporting period, Primark also evaluated the effectiveness of the independently operated Amader Kotha Helpline in Bangladesh against the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights. The evaluation combined operational performance data with confidential feedback from workers to assess how the mechanism operates in practice and the outcomes it delivers. The findings demonstrated strengths in areas including accessibility, legitimacy and predictability, while also identifying opportunities to strengthen longer term outcomes and support continuous improvement.

Communicating

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

We report on issues relating to 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 28 October 2026.

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.