People in our supply chains and surrounding communities

Our Group Supplier Code of Conduct is the foundation of our businesses' work with respect to working conditions and labour standards in their supply chains.



A rice farmer growing Hom Mali rice for Westmill using the Sustainable Rice Platform Standard, Thailand

Human and labour rights in our supply chains

Our businesses work with a diverse range of suppliers from large businesses to smallholder farmers.

Our Group Supplier Code of Conduct is an essential requirement of the responsible business conduct of our businesses. This Code is based on the core conventions of the International Labour Organization ('ILO') and on the Base Code of the Ethical Trading Initiative.

Human rights due diligence across our Group

In their application of the Group Supplier Code of Conduct, many of our businesses continue to develop and improve human rights due diligence processes. Some of them are guided by the United Nations Guiding Principles on Business and Human Rights ('UNGPs'), the Organisation for Economic Co-operation and Development ('OECD') Due Diligence Guidance for Responsible Business Conduct, and the ILO Decent Work Agenda.

Our devolved business model requires each of our businesses to adopt tailored approaches based on their specific supply chains and the nature of their supplier relationships. Assessing where potential negative human rights risks and impacts might exist, combined with supply chain mapping, helps some of our businesses identify, monitor and, where applicable, manage risks and impacts related to people and communities in the supply chain.

Risk management and monitoring

Our businesses use a number of data platforms to help assess and monitor potential human rights risks including the Verisk Maplecroft's risk assessment tool, which provides country risk data for 150 commodities, and the Sedex (Supplier Ethical Data Exchange) online database. In some of our businesses, risk monitoring is conducted through audits carried out by internal teams or third parties. Some businesses also engage workers and their representatives directly outside of the audit process to understand what issues they face.

For example, Primark's Ethical Trade and Environmental Sustainability ('ETES') programme is one of the key elements for how human rights due diligence is implemented in its product supply chains. Through this programme, Primark conducted over 2,400 social audits in its suppliers' factories over the calendar year 2024. Primark carries the full cost of these audits, which include rigorous checks for human rights issues against the requirements of the Primark Supplier Code of Conduct, 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[1]. Any potential new factories are audited and only if the outcome of the audit is satisfactory can any orders be placed.

Governance and policies

The chief executives and senior leaders of each business are accountable for managing risks related to human and labour rights in their businesses' supply chains.

The Group Supplier Code of Conduct underpins any relevant policies that our businesses may choose to follow. Twinings Ovaltine and Primark have also developed their own human rights policies and, in 2025, ABF Sugar launched its own too.

Grievance mechanisms and remedy

Our businesses seek to use the leverage they have with their suppliers to cease, prevent or mitigate the risk of negative human rights impacts on workers in their supply chains, where appropriate. Some of our businesses have or are developing grievance mechanisms to give workers a voice on the issues they face in the workplace. Primark has multiple approaches to achieving effective grievance mechanisms. As a result, in Bangladesh, India, Türkiye and Pakistan, workers' grievances are routed to specific grievance mechanisms run by local implementation partners such as non-governmental organisations (NGOs) or unions. For example, the Amader Kotha Helpline in Bangladesh provides workers in supplier factories with a confidential and accessible means to raise concerns. Where issues are raised through grievance mechanisms linked to our businesses, they will endeavour to follow up and investigate accordingly, with the interests of those affected front of mind.

Stakeholder consultation and transparency

Different stakeholders including NGOs, trade unions, governments, other businesses (subject to relevant competition and anti-trust laws) and industry bodies such as AIM-Progress, provide inputs into the approach adopted by some of our businesses on human rights due diligence. They work with these organisations due to their expert knowledge and we acknowledge the value that their contribution brings.

Transparency about who and where our businesses source from is essential to their understanding of human rights risks and, where necessary, enables collaboration to resolve issues both locally and across our industry.

Twinings and Primark both publish sourcing maps to help their customers understand their supply chains better.

1. Tier one: factories manufacturing finished goods.

Supporting communities

Alongside our work to respect human and labour rights, some of our businesses aim to positively contribute to the communities in which they operate. For instance, our sugar businesses in Africa recognise that their sugar estates are a key part of the communities where they operate. This is reflected in their activities to support those communities, such as providing clinics, schools and local services to support their workforce, and in some cases their communities and surrounding neighbours. In 2025, our sugar businesses in Africa continued to invest in several community support projects across their operational areas. These initiatives focus on providing access to potable water, offering natural disaster relief, improving healthcare, advancing education and developing infrastructure.

People in our supply chains and surrounding communities – Retail

Primark has a long-term commitment to promote decent work in its supply chain.



A trainee operator in the Sudokkho programme at a Primark supplier factory in Dhaka, Bangladesh

Human and labour rights in our supply chains

Primark's Supply Chain Human Rights Policy outlines its commitment to human rights due diligence in its supply chain, the foundation of which is built on its Supplier Code of Conduct which sets out the standards the business expects of its suppliers.

The Primark Supplier Code of Conduct, which is based on the Core Conventions and the Fundamental Principles and Rights at Work of the International Labour Organization, covers Primark's supply chain, including goods for sale and services such as service providers, logistics and transportation. It includes supplier requirements on labour rights such as health and safety, freedom of association, discrimination and child and forced labour. It also covers suppliers and providers of those goods and services Primark does not sell, but which it consumes itself or requires in the running of its operations. Compliance with the Supplier Code of Conduct is a key condition of doing business with Primark.

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, unions, governments and civil society organisations whose support and feedback are essential to its progress.

Primark's ETES team has over 130 people based predominantly 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 chain. Through this programme, Primark conducted over 2,400 social audits during the calendar year 2024. These audits are carried out by Primark employees based in sourcing countries, and also by carefully selected third parties. Primark carries the full cost of these audits, which include 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[1]. Any potential new factories are audited and only if the outcome of the audit is satisfactory can any orders be placed.

Primark also implements additional due diligence activities where necessary. For example, its Structural Integrity Programme was established in 2013 in Bangladesh to assess the safety of all supplier factory buildings against international standards. If areas are found to require improvement, it works with the suppliers and their factories, in collaboration with a team of structural and civil engineers from international engineering firms, to provide technical support and guidance. The Structural Integrity Programme was expanded to Pakistan and Cambodia in 2023, with ad hoc support for other sourcing countries as required.

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 non-governmental organisations (NGOs), to support the implementation of industry-wide grievance mechanisms in our 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 social 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.

More detail about Primark's approach to human rights due diligence can be found in its Modern Slavery Statement, Supply Chain Human Rights Policy and Sustainability and Ethics Report.

1. Factories manufacturing finished goods.

Solutions and projects for systemic issues in factories

Where inherent risks and more systemic issues are identified, Primark's Social Impact team works with suppliers and their factories, as well with partners and other brands, to support suppliers to address these through longer-term solutions and projects. The first of these projects began well over a decade ago, and the portfolio of work continues to grow and develop. Local teams play a key role in working closely with the supply chain and external experts to identify issues, find solutions and share learnings with others. Over the years, Primark has identified several thematic areas to support factory workers in its supply chain, some of which are included in the Primark Cares strategy and are aligned with the activities undertaken as part of Primark's supply chain human rights due diligence. These include:

- creating financial resilience;
- promoting equal opportunities for women; and
- improving health and wellbeing.

Primark continues to address the specific challenges faced by vulnerable workers in its supply chain, including 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 NGOs Women Win and 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 the financial resilience of workers through several initiatives focused on social protection and financial inclusion. In 2025, these initiatives are run in three countries and provide 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.

Primark's work on living wages

Primark's work in this area continues to be focused on industry collaboration through its membership of ACT (Action, Collaboration, Transformation), working on transparency on wage data and continued embedding of ACT's purchasing practices. Primark's social audit programme also monitors supplier factories' compliance with legal wage requirements.

Every two years, ACT conducts a survey on purchasing practices with suppliers and employees of its member brands. In February and March 2025, an updated version of the survey was completed by Primark's colleagues and suppliers. The full set of results for the 2021 and 2023 surveys have been published by Primark on its Sustainability and Ethics Progress Report. The aggregate results for the 2025 survey, for all ACT brands, are expected to be published at the end of 2025.

Primark recognises that embedding responsible purchasing practices[2] will support better conditions to enable suppliers and their factories to pursue a living wage.

The business set up a working group, comprising some of its key suppliers and its own in-country teams, to develop a tool to identify labour costs. To date, Primark has also provided training to 350 suppliers and 550 buying and merchandising colleagues on this costing method. Following training on the ACT Labour Costing Protocol, 98% of final orders placed with Cambodian factories for Primark Spring/Summer 2025 season provided the labour cost of products. Primark continues to train and upskill its product teams on the importance of implementing responsible purchasing practices. Further details on Primark's work in this area can be found in its Sustainability and Ethics Progress Report.

2. Read more about the purchasing practices commitments of ACT members here.

Transparency and traceability

Primark's Global Sourcing Map[3] covers tier one factories that make its products, and the number and gender of workers at each site. Since 2022, Primark has been rolling out its Traceability programme. Primark is using the platform TrusTrace to map its products. In 2025, the programme reached 230 suppliers and 10 raw materials. This includes Primark's clothing, textile and footwear suppliers, meaning it now has a dashboard of these supply chains, from raw material to finished product. Primark trains suppliers on data requirements within this programme and how they can support it.

3. The factories featured on the map are Primark's suppliers' production sites which represent approximately 98% of Primark products for sale in its stores. A factory is detailed on the Map only after it has produced products for Primark for a year and has become an established supplier. Tier one factories manufacture finished goods.



Sudokkho – Upskilling workers, empowering women in Bangladesh

Primark's Sudokkho programme in Bangladesh was developed to enhance in-house technical training capabilities within supplier factories. The programme continues to expand its reach, with new factories joining and existing ones increasing their involvement. As of 2025, Sudokkho covers 28 factories across Bangladesh.

The technical training that Sudokkho delivers has several layers. The foundational level trains factory workers through a dedicated initiative in the factory, where trainees acquire new required skills. The initiative develops and trains assessors who support overseeing the technical standards of trainees on the training line before they enter the main production line. Finally, the technical training includes training existing skilled operators, with a specific focus on women, to be supervisors. Its delivery partner, Rajesh Bheda Consulting has been collecting data to evaluate the extent to which factories can maintain Sudokkho training without ongoing support and to measure the programme's long-term effectiveness. This includes evaluating factors such as the presence of a dedicated training line, skilled supervisors and trainers who can train others.

In 2025, Primark's team in Bangladesh surveyed workers and management from 20 factories involved in the programme.

Factory workers undergoing training as part of the Sudokkho programme, Bangladesh

Addressing gender-based violence in the workplace in India

Gender-based violence and harassment (GBVH) is an extremely sensitive issue globally, primarily faced by women. This is often a difficult issue to identify in factories in the garment supply chain, but the risk is real, particularly in South Asia. This is a priority for Primark as it recognises that it is also a barrier to women's progression.

In India, Primark has partnered with St John's Medical College in Bangalore to develop and deliver workplace wellbeing programmes. Building on the success of its mental health initiative, My Space, Primark and St John's created a new programme called Maitri to address GBVH in the workplace through peer-based interventions.

Maitri has been implemented in nine factories and is already helping Primark identify and better understand GBVH risks in the supply chain. The programme trains selected workers to become Gender Champions, trusted peers who listen to colleagues and act as a source of support when GBVH concerns arise.

It is still too early to measure the full impact of Maitri, but initial outcomes suggest the model is effective in surfacing sensitive GBVH issues that might otherwise go undetected. This is helping Primark explore more informed ways to respond and support resolution.

Maitri also complements Primark's existing grievance mechanisms by offering a more informal, peer-led channel for workers to raise concerns.



Attendees at an event organised as part of the Maitri programme, India



Deepening our engagement to support workers' social protection

Across Primark's sourcing regions, most workers are entitled to state benefits, including social protection, and often it is mandatory for factory workers and employers to contribute to employee pension funds. Primark is investing in a number of financial literacy programmes to help workers in its supply chain access the knowledge and tools they need to take control of their finances, from understanding payslips to registering for social insurance. In 2025, these initiatives now run in factories across four countries and cover a wide range of support.

In India, workers in the garment supply chain often have difficulty in accessing their pension funds, held in the state-run Employee Provident Fund (EPF), because of complexities in the system. There are also a number of state-run social protection schemes that workers in India are eligible to access, adding further to the complexity.

To help tackle this, Primark has developed a programme called Securing Futures, which trains select workers to become Nanbans whose role it is to help workers register their details on a government portal in order to access the EPF. Primark has rolled out this initiative in India with the aim of demonstrating to workers the benefits of and requirements for accessing the EPF.

Primark has also invested in a partnership and programme with Haqdarshak. Now running across seven factories, the Haqdarshak programme supports workers to access a broader suite of government welfare through better access to technology.

Primark is working with Haqdarshak to understand the impact of the pilot to date, including the value of potential state benefits workers could access, in addition to collecting worker feedback on the programme.

Primark is currently supporting similar programmes in China.

Garment workers in Primark's supply chain who have participated in the Securing Futures programme, India

Having mental health conversations in Primark's supply chain

Primark continues to support programmes to improve mental health awareness in its supplier factories. Research by Primark and its partners identified depression and anxiety among factory workers and that access to mental health services is generally poor.

In Bangladesh, in partnership with the British Asian Trust, the Moner Kotha ('mind talk' in Bengali) programme aims to increase awareness of mental health issues and build resilience among workers. This is done by providing support for workers through training, capacity building and the provision of mental health information in the workplace.

Taking learnings from a British Asian Trust review and a programme evaluation, Primark designed the next phase to have more of an emphasis on showing factory management the importance and impact of good mental health, encouraging them to support access to counselling among teams.

Primark's My Space programme in India has become a leading example of how workplaces can change attitudes and behaviours around mental health. Similar to Moner Kotha, the programme trains selected factory staff to become lay counsellors who support colleagues experiencing poor mental health or stress. In the long term, improved dialogue and understanding of mental health can reduce the stigma. Primark runs the programme in partnership with St John's Medical College, India. In 2025, the programme has started segregating workplace and personal issues, so that steps can be taken to alleviate those related to work. My Space has also added art therapy and physical health discussions to its curriculum and strengthened engagement with migrant workers through tailored training to overcome language barriers.

To further this agenda, Primark established the Workplace Mental Health Network in 2023, inviting other international apparel brands to build a network of experience in enhancing the availability of mental health support for workers in supply chains. The aim is to encourage knowledge sharing and to build a platform of resources for those involved. As of 2025, there are nine global brands participating in the programme.

Case study – Retail



Partnership with Clear Vision to support workers' eye health in Bangladesh

Vision is essential for garment workers performing detailed tasks like sewing, fabric cutting and operating machinery. Poor vision impacts productivity, increases the possibility of faulty production and accident risk, and can lead to absenteeism, reduced earnings and mental health issues.

Primark's Clear Vision workplace programme, in partnership with Vision Spring, provides vision tests and glasses to the factory workforce, aiming to increase earning potential, learning ability, safety, and wellbeing in Bangladesh.

Common causes of vision loss include uncorrected refractive errors, cataracts and glaucoma, with 80% of cases being preventable or treatable. Barriers to treatment include limited rural access, infrastructure gaps and financial constraints. Suppliers share a proportion of the total cost for the project implementation, demonstrating a strong recognition of the need for glasses as well as their benefits to workers and factories.

Primark has partnered with Clear Vision to deliver a programme which aims to support workers through the provision of glasses, helping them experience the benefits of clear vision and improved quality of life.

In 2025, nearly 35,000 eye tests were carried out, with glasses provided to 12,982 workers. 90% of these were first-time wearers. Following the project's success across the initial 16 factories, Primark will continue to expand the project into more factories in Bangladesh.

Factory worker participant from the Clear Vision workplace programme, Bangladesh

People in our supply chains and surrounding communities – Grocery

Our Grocery businesses recognise their responsibility to respect human rights and the impact their actions can have on human rights across the value chain.



Tea workers in the Twinings supply chain, Indonesia

Human and labour rights in our supply chains

Our Grocery businesses respect internationally recognised human and labour rights and work to identify and manage adverse impacts in their supply chains and operations in line with the requirements of the Group Supplier Code of Conduct.

Grocery Group

Grocery Group businesses are prioritising their efforts to monitor human and labour rights risks by focusing on specific value chains with the highest perceived risks for workers. These include raw materials, packaging, finished goods and services (including security, cleaning workwear, temporary labour and logistics providers).

Risks are assessed through the Sedex (Supplier Ethical Data Exchange) 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.

Tier one and tier two suppliers of raw materials and other key commodities are required to complete the Sedex self-assessment questionnaire, with a completion rate of 90% in 2025. Subsequently, in-scope suppliers are required to upload the results of all respective ethical audits conducted onto the Sedex platform. Any critical 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, minimise, prevent or mitigate the issues raised. All identified issues are continuously monitored and reviewed to support ongoing improvement.

Twinings Ovaltine

Twinings Ovaltine has controls and processes in place to assess and manage human and labour rights risks across its global supply chain. It recognises that upholding and promoting human rights practices across its value chain can be a critical foundation for a more sustainable and resilient business. The business is committed to embedding the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises into its sourcing, and thereby conducting business with integrity and respecting human and labour rights principles through its Code of Conduct and Human Rights Policy.

Twinings Ovaltine 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 its own operations as well as tier one supplier sites, including third-party manufacturers (e.g. co-manufacturers, licensing), warehouses, packaging, raw materials processors and 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 Twinings Ovaltine, 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. In 2025, 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.

Modern slavery training continues to be rolled out for tier one supplier factories operating in high-risk countries, with a focus on suppliers employing migrant workers. The e-learning course is developed by Twinings, and suppliers are able to complete the course once they have registered.

In its tea and herb supply chains, Twinings Ovaltine is working towards supporting suppliers to address 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 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.

Following issues identified in its 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 risks, and aim to protect women workers.

Twinings is committed to playing a leading role in developing a progressive and thriving tea and herbs industry. It recognises that this will require collaboration with a range of stakeholders across the sector 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 and industry platforms, as well as the tea and herb growing communities it sources from.

George Weston Foods

George Weston Foods continues to take steps to improve the visibility and the ethical performance of its supply chains, including registering some of its businesses on the Sedex online database and requesting suppliers to do the same. Tip Top has onboarded a significant portion of its suppliers and all of its bakeries onto Sedex, Mauri ANZ rolled out Sedex to its suppliers for bakery ingredients and packaging, with a broader implementation programme underway.

ACH

ACH has started engaging its supply base on human rights issues within the supply chain.

Case study – Grocery



Westmill partners with AB Mauri to support turmeric farmers in India

In May 2024, Westmill, in partnership with AB Mauri, launched a series of social and environmental initiatives to support turmeric farmers in Maharashtra, India. The programme aims to enhance farmer livelihoods and deliver community-wide benefits by increasing yields by 10%, raising women's annual incomes and improving access to healthcare and safety resources.

Since the projects started, 125 farmers have registered, with early results showing a 15% increase in yields as of mid-2025.

Turmeric farmers from the Westmill spice project, India

Key initiatives in the first year include:

- distribution of high-quality seeds for 30% of crop areas;
- provision of boiling machines to improve turmeric quality;
- creation of a designated waste chemical area to enhance health and safety practices;
- supply of personal protective equipment to farmers and access to bi-annual medical camps for the wider community;
- construction of a shared toilet facilities in key public areas where people frequently gather for work and social activities; and
- distribution of around 800 packs of sanitary pads to women in the village.

In 2025, Westmill purchased 74 tonnes of turmeric from the project, representing 21% of the total turmeric purchased by the business, which is sold under the Rajah brand in the UK.

People in our supply chains and surrounding communities – Ingredients

Our Ingredients businesses understand the importance of working conditions and labour standards within their supply chains and are committed to operating as responsible neighbours to their surrounding communities.



Human and labour rights in our supply chains

Our Ingredients businesses adhere to the Group Supplier Code of Conduct which sets out the expectations of suppliers when it comes to managing human rights issues within their supply chains. Each business determines the most effective application of the Group Supplier Code of Conduct for their specific raw material supply chains.

AB Mauri

Some AB Mauri businesses use desk-based screening to identify suppliers deemed to be at a potentially higher level of risk of human rights issues. A supplier self-assessment questionnaire is sent to high-risk suppliers to assess working practices.

AB Mauri has been using the Sedex (Supplier Ethical Data Exchange) online platform in the UK to help identify suppliers at risk of human rights issues. The use of Sedex is now being adopted by other AB Mauri businesses across the division.

ABFI

ABFI uses desk-based screening processes to identify potential risks associated with human rights in its supply chains, based on product origins. Where potential risks are identified, ABFI engages with relevant suppliers to investigate further. Where necessary, ABFI proactively works with supply chain partners to provide training and education to increase awareness of social accountability practices and standards. Some ABFI businesses use the Sedex online database for supply chain mapping and risk management, as well as to promote supply chain transparency and data exchange among industry partners.

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.

AB Mauri programme for unemployed people with bakery skills, Chile

Supporting communities

AB Mauri and ABFI pursue opportunities to add value to communities beyond their business operations. Areas of focus across the global network include donating food and promoting education and inclusion.

AB Mauri

AB Mauri is actively engaged with local communities through various initiatives. In South America, AB Mauri has a longstanding tradition of supporting the training of professional artisan bakers and pastry chefs. In recent years, its businesses in Chile and Argentina have established partnerships with local educational institutions, a college in Chile and a university in Argentina, to deliver certified training programmes. These initiatives are designed to open doors for individuals from disadvantaged backgrounds, equipping them with recognised professional qualifications and improving their employment prospects. At the same time, the programmes help address the declining number of skilled artisan bakers and pastry chefs in the region. To date, more than 700 individuals have graduated from these programmes, with many now working in the baking and pastry industry.

In Sri Lanka, AB Mauri launched an initiative seeking to address the lack of safe, potable drinking water in rural villages, a challenge that has contributed to chronic kidney disease (CKD) affecting 8-20% of the population[1]. As part of this initiative, a reverse osmosis plant was constructed at a community school in a rural village in Anuradhapura district. The plant, with a daily capacity of 10,000 litres, serves 1,100 students and 400 households, providing clean water and helping reduce the risk of CKD.

AB Mauri Brasil collaborated with its distribution partners and a local NGO to distribute products made from cashew nuts grown by the NGO's members in an underdeveloped region of the country.

ABFI

ABFI continues to promote careers in science, technology, engineering and mathematics (STEM) to young people in its local communities. For the third consecutive year, AB Enzymes welcomed school children into its laboratories in Darmstadt, Germany, offering hands-on experiences in enzyme technology and encouraging students to explore STEM careers. Similarly, Ohly's Boyceville site in the US participated in the 2024 Smart Girls Rock event, aimed at raising awareness of STEM opportunities among middle school girls. SPI Pharma partnered with the Delaware Department of Education and held a STEM day to provide teachers with a better understanding of what STEM careers are available for students in the area.

1. Asanga Venura Ranasinghe, Lakshmi C. Somatunga, Gardiye W. G. P. Kumara, et al., "Decreasing Incidence of Hospital Diagnosed CKD/CKDu in North Central Province of Sri Lanka: Is It Related to Provision of Drinking Water Reverse Osmosis Plants?" BMC Nephrology 25, no. 91 (2024), https://bmcnephrol.biomedcentral.com/articles/10.1186/s12882-024-03534-w

People in our supply chains and surrounding communities – Sugar

ABF Sugar recognises that its long-term success relies on upholding the respect and dignity of its workforce, supply chain workers and communities.



A pump station provided by Illovo Sugar Malawi to supply potable water.

Human and labour rights in our supply chains

The global sugarcane industry is vulnerable to human rights-related risks due to its reliance on labour-intensive and seasonal activities such as weeding, planting, cane cutting and harvesting.

In 2025, the division launched a Human Rights Policy, aligned to international standards, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO's Decent Work Agenda.

The division refers to 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 2025, 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 the development of a Human Rights Due Diligence Framework. These findings form part of the businesses' five-year plan priorities.

Training remains a key pillar of ABF Sugar's approach to mitigate human and labour rights-related risks. All head office and business unit staff 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 the UK, British Sugar has a Responsible Procurement Policy to guide supplier engagement and manage environmental and social risks. The policy covers key areas such as decarbonisation, sustainable agriculture and respect for human rights.

Supporting communities

ABF Sugar's businesses continue to invest in their relationship with communities and key stakeholders. For instance, its businesses in Africa recognise that their sugar estates are a key part of the communities where they operate, and this is reflected in their activities that aim to support those communities, such as by helping with the provision of clinics, schools or local services to support their workforce, and in some cases their communities and surrounding neighbours.

In 2025, its businesses in Africa continued to invest in several community support projects across their operational areas. These initiatives focused on providing access to potable water, offering natural disaster relief, improving healthcare, advancing education and developing infrastructure.

In April 2025, an assessment of 11 primary schools on two estates in Malawi was conducted to create a roadmap for the long-term sustainable improvement of educational facilities. Throughout 2025, efforts were made to address infrastructure maintenance needs and improving sanitation facilities.

British Sugar is committed to being a good neighbour and community partner. In 2025, the business supported over 200 local charities, good causes and community projects across East Anglia and the East Midlands.

People in our supply chains and surrounding communities – Agriculture

AB Agri recognises the risk of human rights impacts in its businesses' global supply chains and believes in respecting human rights.



ABN delivery at our feed mill in Enstone, UK

Human and labour rights in our supply chains

AB Agri's businesses source around 3,000 raw materials from over 1,400 suppliers, including bulk commodity suppliers and ingredient manufacturers. AB Agri values supply chain diversity and seeks to support small and mid-sized suppliers in upholding its standards. If the business needs to implement new standards or data collection requirements, it aims to work in partnership with its suppliers and engage them as early as possible.

AB Agri's Responsible Sourcing Policy and its internal Responsible Sourcing Standards apply to all its businesses. The Policy outlines areas of focus, including deforestation and conversion of natural ecosystems, human and labour rights, and efficient and more sustainable resource use. 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.

AB Agri is implementing the requirements of its Responsible Sourcing Policy, starting with the raw material category. This category includes a wide range of bulk agricultural commodities such as cereals, oilseed meals, macro minerals, feed additives and co-products. In the longer term, the division has committed that all procurement categories will adhere to defined responsible sourcing standards by 2030.

Human and labour rights risks linked to certain raw materials are identified and monitored using the Verisk Maplecroft global risk analysis tool and the Sedex (Supplier Ethical Data Exchange) online database. Ultimately it is the suppliers' responsibility to manage impacts in their supply chains, in accordance with AB Agri's Responsible Sourcing Standards. AB Agri uses information from its risk analysis to inform conversations with relevant suppliers, and to encourage their work to comply with these standards.

By engaging with its direct suppliers, AB Agri 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 suppliers are then required to complete an online Sedex assessment, which is reviewed by the AB Agri ethical compliance team. Depending on the findings, this may result in an on-site audit.

Throughout this process, AB Agri focuses on supporting its suppliers to achieve its Responsible Sourcing Standards and only considers alternative sourcing where efforts to use its leverage to address any relevant issues have failed.

By the end of 2025, 96% of AB Agri's 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.

In 2025, AB Agri continued to work collaboratively with its suppliers, particularly those identified as higher risk. During the year, the business engaged with some raw material suppliers to share insight on their supplier approval processes and any subsequent audit process. AB Agri seeks partners that can demonstrate robust ethical oversight across their supply chains. It also commissioned social audits, including audits at third-party manufacturers in China and palm product suppliers in Malaysia. These audits resulted in positive actions from suppliers to address non-conformances and align with the Ethical Trading Initiative (ETI) Base Code.

AB Agri has expanded its focus beyond raw materials to include third-party manufacturing and contracted labour to this process. It conducted a review of contracted labour used across its own manufacturing sites globally, identifying potential risks. It has also assessed all its third-party manufacturers using a set of critical factors to evaluate risk levels.

AB Agri also provides information and training on issues relating to human rights for new employees as part of its induction process.

Regarding its own operations, all AB Agri manufacturing sites have completed an annual Sedex self-assessment. In 2022, it implemented a three-year rolling internal audit plan to conduct assessments on all its manufacturing sites globally. These have all been completed.