



Modern Slavery Statement 2024/25



This statement is being published in accordance with the Modern Slavery Act 2015.

It sets out the steps taken by Westbridge Foods Ltd & CP Foods UK Ltd during the year ending 31st December 2024, to prevent modern slavery and human trafficking in their business and supply chains.

This is the 9th Modern Slavery statement for the combined UK business that covers Westbridge Foods Ltd, CP Foods UK Ltd and all their subsidiaries.

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Westbridge Foods Ltd & CP Foods UK Ltd, and subsidiaries, are committed to preventing Modern Slavery, Forced Labour and Human Trafficking in our business and our supply chains.

This is our 9th annual statement and made in pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that we have taken during the year ending 31 December 2024, and continue to take, to prevent modern slavery and human trafficking in its business and supply chain.

Our modern slavery programme remains a top priority for our business and during 2024 we continued to develop and enhance our approach by:

- Enhancing the training and awareness programme across our own operations
- Increased the number of trained modern slavery champions across our sites.
- Updated and formalised our Right to work Check policy to include all agency workers.
- Published our Banned & Restricted sourcing policy to minimise risk within our supply chains.
- Further engaged with our suppliers on Responsible Recruitment.
- Rolled out 3rd party social audits in our high-risk supply chains beyond Tier 1

We remained reliant on our collaboration with industry groups, to enable us to continue to raise awareness of Modern Slavery through a common approach identifying, addressing, and managing the risks of Human Rights abuses of workers in our businesses and our global supply chains.

This statement has been approved by the Board of Directors and will be reviewed annually.



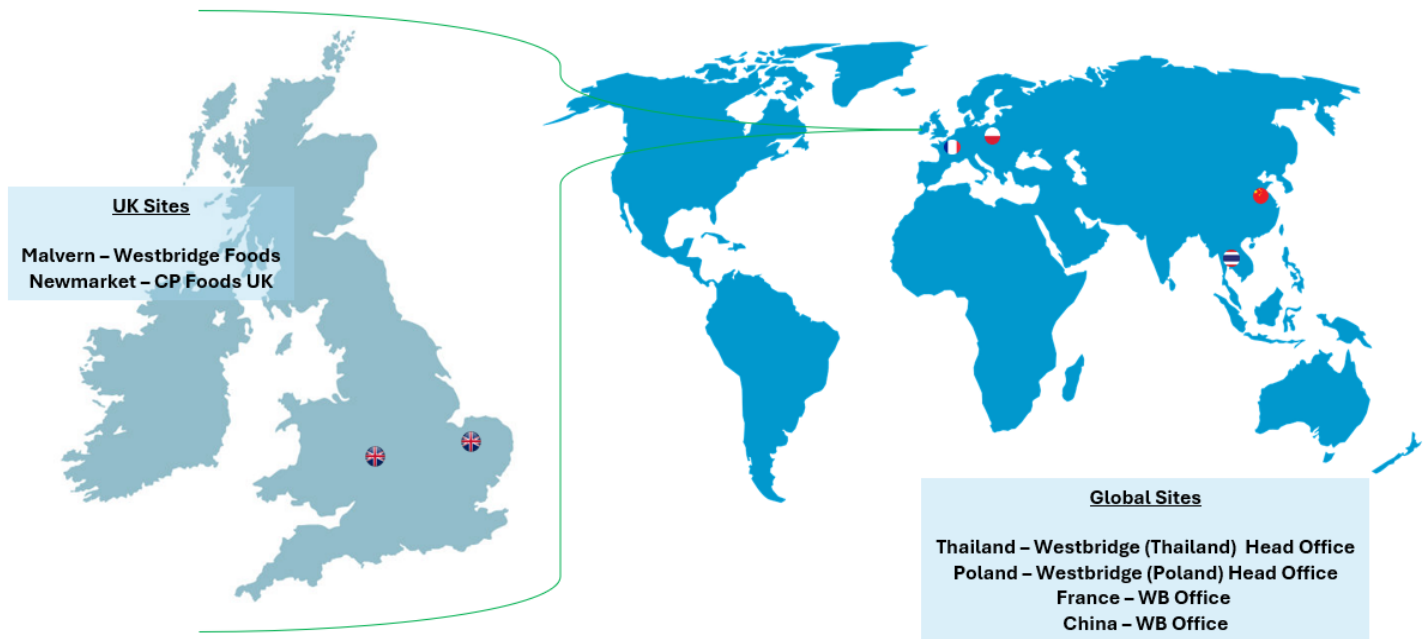
Tim Browne,
Group Managing Director,
30th June 2025

Westbridge Foods Ltd is a global business supplying private and branded products to the leading retailers, brands, manufacturers, and the foodservice sector. Our head office is based in Malvern, UK and with 4 global teams based in offices in Thailand, Poland, France and China.

The company's expertise lies in the development, sourcing and supply of products and ingredients across many food groups sourced from the UK, EU, Asia and South America, including raw, coated, part and fully cooked proteins, vegetables and party food to businesses in the UK and the EU with an export division supplying companies in Asia and Australia.

CP Foods UK Ltd is our manufacturing facility based in Newmarket, UK, who specialise in sourcing, processing, and repacking frozen raw materials into chilled private and own branded products to leading brands, retailers, manufacturers, and the foodservice sector.

Westbridge Foods Ltd & CP Foods UK Ltd have an annual turnover of £550 Million, and we employ approximately 300 people, both directly employed and agency workers, across our global operations.



Westbridge Foods Ltd & CP Foods UK Ltd are a wholly owned subsidiary of Charoen Pokphand Foods Public Company Limited (“CPF”) one of the world's leading listed agro-industrial and food conglomerates, which operates a completely vertically integrated business and employs more than 135,000 people globally. With net annual sales of 580,747 million Thai Baht in 2024, CPF operates in both the livestock and aquaculture businesses and incorporates animal feed, animal breeding and farming, food manufacturing and processing, food retailing and restaurant businesses with operations in 17 countries and exporting to more than 50 countries across 5 continents.



As a business we will not tolerate the abuse of human rights within any part of our business, or our supply chains and we take any allegations that human rights have not been properly respected very seriously.

We actively recognise the importance of our participation in combatting modern slavery in our business and supply chains and have specific policies setting out our requirements for our suppliers and operations to adhere to.

PREVENTING HIDDEN LABOUR EXPLOITATION POLICY

Our global sourcing principles on modern slavery have been strengthened by adding this policy, prohibiting the payment of direct or indirect illegal recruitment fees to secure a job. This policy outlines our commitment as a business to limit the risks of modern slavery.

ANTI-MODERN SLAVERY & ETHICAL TRADE INITIATIVE (ETI) POLICY

Based on the Ethical Trading Initiative (ETI) Base code which states that employment must be freely chosen, with no forced, bonded, or involuntary labour. All suppliers and subcontractors who are not already bound by ETI requirements through ETI or SEDEX Membership are required to adhere to this policy.

BANNED AND RESTRICTED SOURCING POLICY

In 2024, we published our Banned & Restricted Sourcing Policy, outlining those countries or territories where, as a business, we do not wish to source any products, ingredients, or raw materials. This policy was developed to minimise the risk of our business activities potentially play a role in global forced labour or support illegal activities.

POLICIES PROTECTING OUR EMPLOYEES:

- Recruitment and Selection Policy
- Grievance Policy and Procedure
- Whistleblowing Policy
- Equal Opportunities Policy
- Dignity at work Policy

The company whistleblowing line has been in operation for 7 years, aimed primarily for our workers in the UK to raise concerns for themselves and other colleagues, in 2024 this was rolled out to all our employees in our global offices.

BUSINESS ETHICS

- Gifts & Hospitality Policy
- Anti-bribery Policy

We appreciate that this area is complex and as our global supply chains increase, our continuous efforts will ensure that our policies are adapted to address emerging risks.

Our commitment is to ensure that our policies are available to all employees at all sites through the most appropriate communication platforms. Training is given to ensure awareness of the policies both internally and within our supply chains.

The policies are reviewed annually to ensure that they remain relevant to effectively highlight and address the challenges we face.

All our policies are available on request to ESG@westbridgefoods.com

Our supply chains are global and often complex and during 2024, we continued to increase our visibility of our suppliers beyond Tier 1. Transparency and traceability are a key tool for our business to fully identify and address the risks of modern slavery and forced labour in our own operations and supply chains.



128

Active Customers

485

Active product lines

43

Food Suppliers

27

Suppliers in high-risk locations

>70

Supplying Sites

>300

Tier 2 supply chain actors identified

Our risk assessment process involves an ongoing assessment of all our suppliers and supply chains. Our approach has been developed and evolved over a number of years as the complexity of our supply chains has become more visible.

To understand the modern slavery and human trafficking risks associated our business and supply chains we use a number of resources including:

- Food Network for Ethical Trade (FNET) risk assessment which combines published reports such as the Global Slavery Index, the US Trafficking in Persons (TIP) Report, the ITUC Global Rights Index
- SEDEX risk assessment along with the individual supplier's data from the SEDEX SAQ
- Social Compliance audit results.
- Horizon scanning and media reports

Using all this data together we are able to focus our attention onto those supply chains, industries, or countries of operation where the risk is highest and for the year 2024 are priorities were:

- High-risk sourcing countries & regions
- Migrant Labour and Recruitment Fees
- UK Labour Agencies
- Right to work verifications

DUE DILIGENCE

Having carried out a risk assessment and identifying our priority risks, it is important this is followed by adequate due diligence to identify issues that may indicate modern slavery. We have extensive supply chains in high-risk countries, and this is where our efforts have been focussed.

We require all our food and packaging raw material suppliers to be SEDEX members and complete the SEDEX SAQ at least annually, and for those suppliers in high-risk countries to have a Semi-announced SMETA audit either bi-annually or annually as a minimum. In 2024, we have started to require upstream supply chain actors (e.g., Farms, Hatcheries, Feed Mills), which have been identified as high-risk, to register on the SEDEX system and have started to conduct SMETA audits across a defined sample of those sites.



We recognise the importance of audits in providing a snapshot of working conditions in our supply chains but also understand their limitations. Therefore, as we continue to use these audits, we strengthen their function by ensuring the audit data is reviewed alongside the outcomes from worker interviews (conducted anonymously by a random selection of site personnel).

Our anti-modern slavery and ethical trading policy requires suppliers to have an effective grievance mechanism in addition to a Whistleblowing or Labour hotline. Any issues highlighted are reported in our KPI's. In severe cases there is a framework in place to remedy vulnerable or at-risk workers, whether that be in the UK through local charities or GLAA, or in Asia through on the ground NGOs such as Labor Rights Promotions Network (LPN).

We recognise that there will be risks and vulnerabilities in our supply chains and our efforts to identify, act and remedy will ensure we have sustainable ethical supply chains.

Our employees play a key role in helping us to ensure modern slavery abuses do not take place in our business or our supply chain. In 2024, we continued to deliver training and awareness to management and employees including:

TRAINING

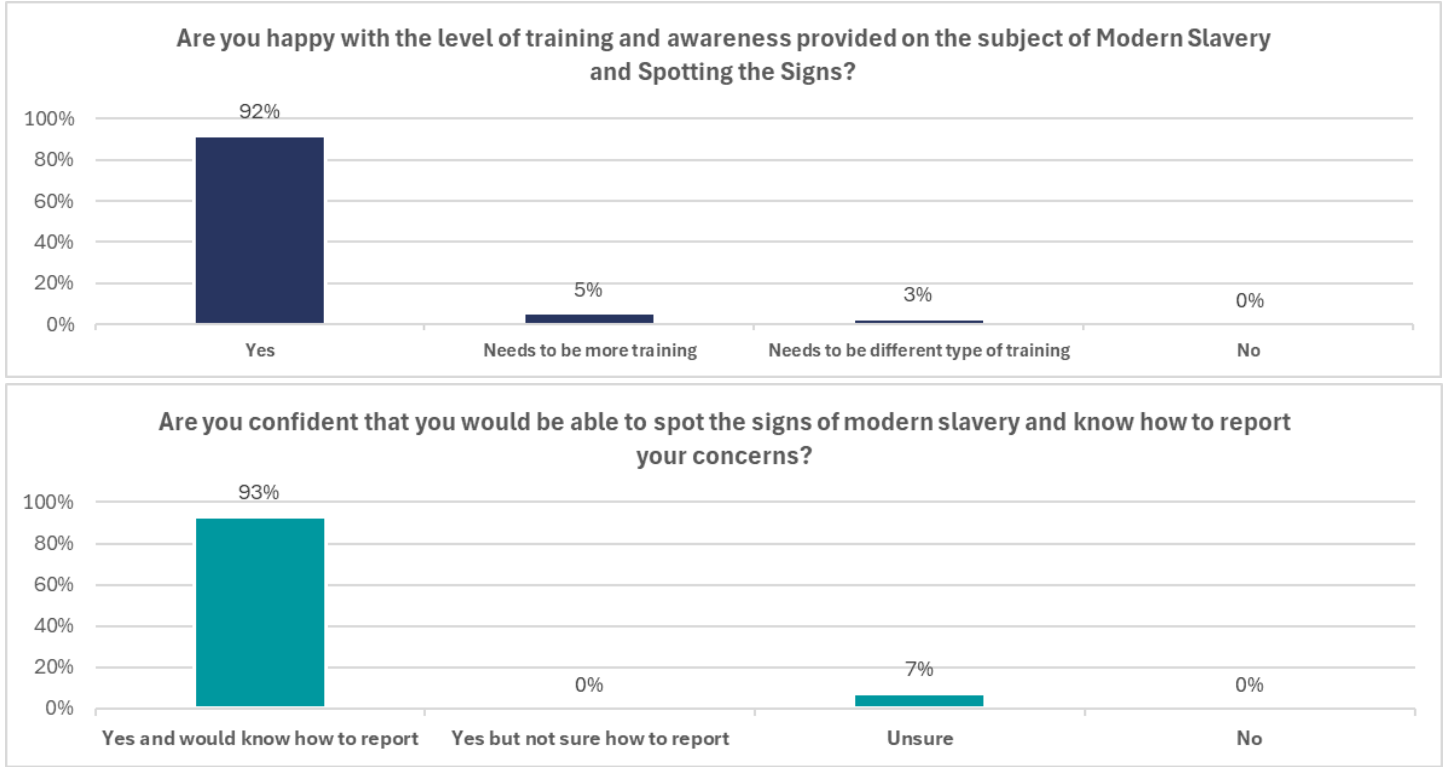
- All new employees, including agency workers, go through Modern Slavery awareness training which includes material and videos produced by Stronger2gether during their initial induction.
- All new “at risk” employees based at our manufacturing site have received enhanced spotting the signs/how to report training.
- All current employees completed the annual online Modern Slavery Awareness refresher training.
- Stronger2gether training on tackling Modern Slavery in UK Business and Global Supply Chains training undertaken by Responsible Sourcing Team.
- Regular participation in Human Rights, Modern Slavery, and industry specific training by the Responsible Sourcing Team.

AWARENESS RAISING











- Poster campaign, refreshed annually, displayed across all sites in the UK on how to spot the signs of potential victims.
- Whistleblowing posters across all sites.
- Regular engagement in human rights collaborations including SEDEX, Stronger2gether, Seafish, FNET
- Quarterly Modern Slavery awareness e-newsletter to all employees.
- Quarterly Modern Slavery Champions in-person awareness events set around key themes throughout the year, including Grocery Aid Day, UK friendship Day and Anti-modern Slavery Day.

TRAINING & AWARENESS EFFECTIVENESS

To ensure that the training and awareness programme is effective and relevant to workers, we conducted a survey of all workers to gauge the level of understanding of this topic and to ensure our programme is effective or to understand how we can evolve to meet the needs of workers.



We understand that the issue of Modern Slavery and Human Trafficking is a global issue and that we will not be able to tackle it alone and that collaborations are fundamental to highlighting, addressing, and managing the risks. During 2024, we continued those partnerships and remained active members.

	<p>The Seafood Ethics Action Alliance (SEA Alliance) is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence conducted in the global seafood supply chain and ensure respect for human rights.</p> <p>https://seaa.org/</p>
	<p>The Food Network for Ethical Trade (FNET) was established in 2016 by several major UK food companies to improve human rights in global food supply chains through a common approach to managing ethical trade. We aim to support members to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and to build a forum for sharing issues and best practice.</p> <p>https://foodnetworkforethicaltrade.com</p>
	<p>The Seafood Task Force is a unique collaboration for the seafood industry tackling critical sustainability and ethical issues in the Thailand seafood industry sector. Building practical tools, resources, and a network of like-minded organisations across the seafood supply chain, to help solve these critical issues together. https://www.seafoodtaskforce.global</p>
	<p>Social responsibility is paramount to Seafish and to the entire seafood industry. For us social responsibility encompasses concerns about labour and human rights issues. This includes human trafficking, labour abuses, child labour, debt bondage, forced labour, migrant workers, and slavery, across the whole supply chain.</p> <p>https://www.seafish.org/article/ethics-in-seafood</p>
	<p>Stronger Together is a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking, and other hidden third-party exploitation of workers. We provide guidance, training, resources and a network for employers, labour providers, workers, and their representatives to work together to reduce exploitation.</p> <p>https://www.stronger2gether.org</p>
	<p>Sedex is a global membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. Our collaborative approach helps buyers and suppliers to share and exchange data, helping to better manage social and environmental risks within their supply chain, and positively impact responsible sourcing.</p> <p>https://www.sedexglobal.com</p>
	<p>The Labour Protection Network* was formed to improve the lives of migrant labourers in Thailand by addressing the injustice brought on by discrimination and inequality. Only LPN has the courage to orchestrate life-saving rescues in the near term and the strategic focus to inoculate communities against human rights abuse in the long term.</p> <p>https://www.lpnfoundation.org</p>
	<p>Established in 2004 at the instigation of the UK government, ALP is a specialist trade association promoting responsible recruitment and good practice for organisations that supply the workforce to the food processing, agricultural and wider consumer goods supply chain. The ALP influences government and regulatory policy and provides a range of very useful information and services to its members. The ALP's mission is for "UK labour provision to be recognised as a model of global good practice" achieved through six policy focus areas:</p> <p>https://labourproviders.org.uk/</p>
	<p>The Responsible Recruitment Toolkit (RRT) is a not-for-profit, global programme whose mission is to drive ethical and professional recruitment and labour supply that's good workers, recruiters, and clients. They offer an unparalleled toolkit to help businesses achieve and be recognised for responsible recruitment.</p> <p>https://responsiblerecruitmenttoolkit.org/</p>
	<p>Whistleblowing hotline solutions for organizations of all sizes</p> <p>NAVEX's whistleblowing hotline services provide employees, customers, and suppliers with a safe place to speak up about workplace concerns. Whether for simple or complex organization structures, our reporting system provides the ethics and compliance data you need to inform your program, helping you to spot trends and take corrective action before minor issues become critical.</p> <p>https://www.navex.com/en-us/products/navex-ethics-compliance/hotline-reporting-and-intake/</p>

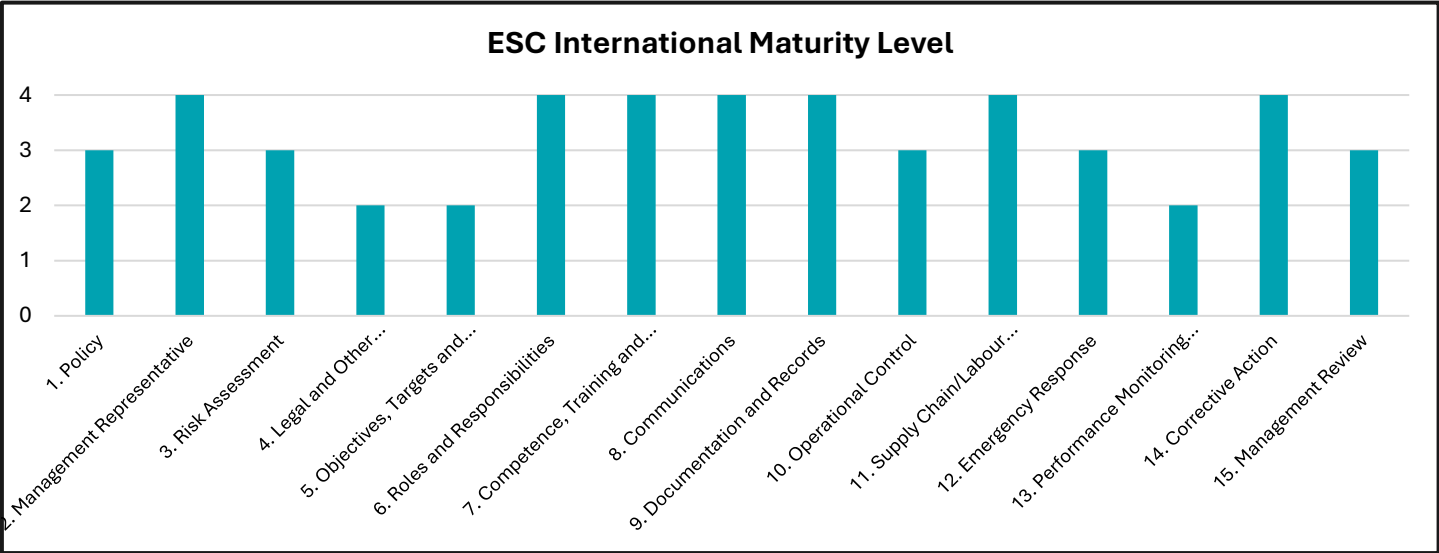
To demonstrate our progress in addressing modern slavery risks, we use key performance indicators (KPIs) to measure our performance and to set progress goals for our next statement. The KPIS are set and reviewed by the company Responsible Sourcing team.

Own Operations Measures	Progress
100% of own UK based employees undertake Modern Slavery awareness	100%
100% UK based Labour Agencies assessed annually	100%
Number of calls to whistleblowing line	0
Number of Potential Modern Slavery Incidents Reported	0
Number of Potential Modern Slavery Incidents Investigated	0
Number of Modern Slavery Incidents Confirmed	0
Quarterly Modern Slavery Awareness in-person events	100%
Modern Slavery Champions available across all shifts at all sites	75%

Supply Chain Measures	Progress
100% high-risk suppliers visible on SEDEX	100%
100% high-risk suppliers receive social compliance audit (annually, where required)	100%
No. of “new” non-conformances raised under ‘Employment is freely chosen’ at high-risk suppliers	5
No. of “new” non-conformances raised under ‘Responsible Recruitment’ at high-risk suppliers	5

In 2024, ESC international conducted an in-depth analysis of our programme and management systems, in relation to human rights, modern slavery and employment practices.

The assessment covered 15 topics including policy, risk assessment, competence, training etc and each topic we were graded against key defined metrics, and the outcome was a positive reflection on our current practices but also gave good guidance on where we need to focus our attention.



In 2025, we will continue to evolve our awareness programme and to continually review our policy and processes to ensure they remain fit for purpose in this ever-changing landscape. The perpetrators of these heinous crimes are always changing and looking for new ways to continue exploitation and whilst we have to react to those changes, we must remain vigilant and try and mitigate the risks before they happen.

As in previous years, we will continue to report on the work that we do through the publication of the annual modern slavery statement.

Our key focus areas for 2025 are:

OWN OPERATIONS

- Conduct a review of the company policies and procedures relating to modern slavery, human trafficking, and hidden labour exploitation, ensuring alignment with the latest from Stronger Together and the Food Network for Ethical Trade.
- Develop and finalise a formal incident response protocol and train relevant staff on the process.
- Review labour agency assessment programme to align with updated guidance to ensure a formal approach is taken to agency due diligence.
- Increase the number of Modern Slavery Champions ensuring all workers have access to in person support during all hours of operation.
- Develop an ongoing training matrix to ensure adequate training is consistently delivered to all levels of the business.
- Continue to progress implementation of the recommendations from the ESC International assessment.

SUPPLY CHAIN

- Improve visibility of our end-to-end food supply chains and looking further upstream to feed inputs and ingredient chains.
- Work with our transport, cold store, and logistics suppliers to understand the recruitment channels and human rights programmes within those industries.
- Start mapping out and engaging with key GNFR suppliers on this topic.
- Continue to review and develop the Banned and Restricted Sourcing Policy to ensure full compliance across our supply chains.
- Continue to work with supply chains to improve recruitment practices to better align with the Employer Pays Principle
- Work with our high-risk supply chains to conduct effective living wage assessments.
- Continue to expand the roll out of social compliance audits beyond tier 1.



Polonia House
Enigma Commercial Centre
Sandys Road
Malvern
Worcestershire
WR14 1JJ

Tel +44 (0) 1684 581800



Fordham Road
Newmarket
Suffolk
CB8 7NR

Tel +44 (0) 1638 722888

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