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Modern Slavery Statement

Modern Slavery Statement 2024

**Associated
British Foods
plc**

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

This statement was approved by the Board of ABF on 30 October 2024.

Relevant entities include but are not limited to: AB Agri Limited; AB World Foods Limited; ABF Grain Products Limited; Allied Mills Limited; British Sugar plc; Cereform Limited; Primark Limited; Primark Stores Limited; R. Twining and Company Limited; and Vivergo Fuels Limited. Several Group businesses, including some not within the scope of the UK Modern Slavery Act 2015, also publish separate or supplemental modern slavery statements. For a full list of ABF subsidiary undertakings, please see note 29 of the notes to our financial statements in our 2024 Annual Report and Accounts.

Introduction

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

As a Group with international businesses operating in 56 countries and with far-reaching complex supply chains, we recognise the important role we can play in addressing the risks of forced labour. We expect our businesses to carry out due diligence on the risks of forced labour in their own operations and supply chains and also to provide remediation to those who have been impacted where this is appropriate. We expect our businesses to apply the principles set out in our Group Supplier Code of Conduct, including our zero tolerance for 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 Conduct² which requires 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. https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm

2. <https://www.oecd.org/investment/due-diligence-guidance-for-responsiblebusiness-conduct.htm>

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Governance and accountability

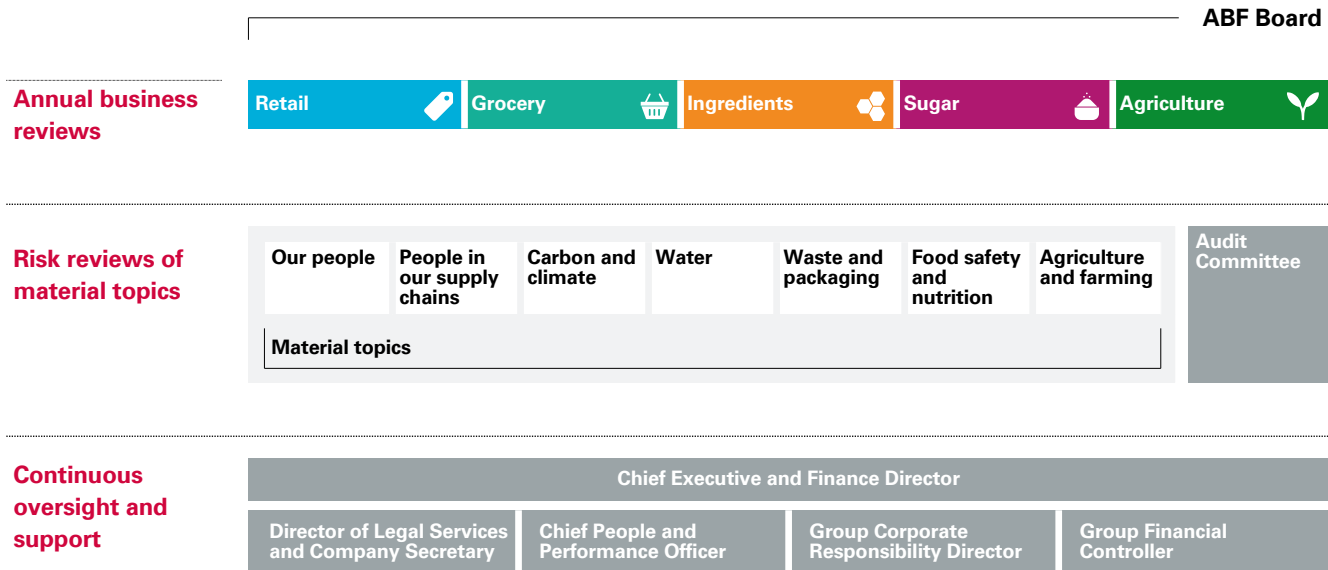
ABF is a diversified international food, ingredients, and retail group with revenues of £20 billion, 138,000 employee operations in 56 countries across Europe, Africa, the Americas, Asia and Australia. We operate a devolved operating model across our five business segments of Retail, Grocery, Ingredients, Sugar and Agriculture.

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

Each business has its own approach to risk management and submits its own annual review of those risks to the Board of ABF. You can read more about our Group ESG governance and Group approach to risk management in our 2024 Annual Report and on our website.

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

Our governance framework chart



Support for legislation

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

Globally, laws to address modern slavery have been significantly strengthened. In addition to the UK Modern Slavery Act (2015), the Australia Commonwealth Modern Slavery Act 2018, the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023), and several important legal developments have emerged that address modern slavery and forced labour. These include the US Uyghur Forced Labour Prevention Act and the forthcoming EU regulation prohibiting products made with forced labour.

Additionally, there are broader legislative initiatives on responsible business conduct, reporting and due diligence, including the EU Directive on Corporate Sustainability Reporting, the EU Corporate Sustainability Due Diligence Directive, the

German Supply Chain Act, and the French Corporate Duty of Vigilance Law.

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

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

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Embedding responsible business conduct in policy and management

Our Group Supplier Code of Conduct covers the following principles:

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour shall not be used;
5. Land acquisition;
6. Living wages are paid;
7. Working hours are not excessive;
8. No discrimination is practised;
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 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. 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 policies³ which discuss their approach to due diligence in their supply chains.
- AB Agri has a Responsible Sourcing Policy⁴ and has developed internal Responsible Sourcing Standards which apply to all its businesses. The Policy outlines areas of focus, including human and labour rights. It also explains the roles and responsibilities of its businesses and their employees. The Responsible Sourcing Standards, based on the Group Supplier Code of Conduct and the Ethical Trading Initiative Base Code, describe the sourcing approach and processes required for different sourcing categories.
- Westmill, Jordans Dorset Ryvita and Allied Milling and Baking have a Preventing Hidden Labour Exploitation Policy to support the recruitment and employment of permanent and temporary agency employees across their own operations and supply chains. This internal document was drafted in accordance with guidance from Stronger Together, an expert independent organisation that provides businesses with training, resources and collaborative programmes on responsible recruitment to prevent labour exploitation within supply chains.

It is important that workers, and those most at risk of modern slavery, can access relevant policies and understand their rights within the workplace. They should also have access to an effective grievance mechanism. Primark's Supplier Code of Conduct has been translated into 44 languages spoken by workers in its supply chain. All of Primark's suppliers' tier 1 factories are required to display its Supplier Code of Conduct in the local language in the workplace.

3. https://primark.a.bigcontent.io/v1/static/supply_chain_human_rights_policy
<https://cdn.shopify.com/s/files/1/0711/2087/9893/files/two-human-rights-policy.pdf?v=1685560032>

4. <https://abagrimedia.azureedge.net/live/abagri/media/policies/ab-agri-responsible-sourcing-policy.pdf>

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Identifying actual and potential harms

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

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

5. <https://www.maplecroft.com/global-risk-data/commodity-risk/>

Business updates

AB Agri identifies human and labour rights risks for certain raw materials using the Verisk Maplecroft global risk analysis tool and the Sedex (Supplier Ethical Data Exchange) online database. It also works collaboratively with its suppliers to understand the country of origin of the feed materials purchased as the first stage of risk evaluation. This is now over 95% complete for all raw material suppliers.

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

Primark does not own any factories. Primark's Ethical Trade and Environmental Sustainability team has over 130 experts in its 10 key sourcing markets. The team works across all aspects of human rights and environmental due diligence, from strategy and risk assessment to supporting Primark's suppliers and their factories in implementing the Supplier Code of Conduct.

Primark's Ethical Trade social audit and monitoring programme is one of the key elements of how human rights due diligence is implemented in its product supply chains. Through this programme, Primark conducted over 2000 social audits over the last year. 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 the audit, supplier factories are issued with a time-bound corrective action plan that outlines any areas for improvement. Using these audits, Primark approves all tier one factories before any orders are placed, assuming the outcome of the audit is satisfactory.

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

External resources used include Verisk Maplecroft's risk assessment tool, which provides country risk data on over 150 commodities⁵, and information from the Sedex (Supplier Ethical Data Exchange) online database. Additionally, businesses refer to industry bodies, in-depth site and supply chain audits, assessment, investigations and stakeholder reports including those from intergovernmental organisations, civil society and human rights watchdogs. Intelligence gathered from teams in our businesses' operations and sourcing locations further supports these efforts.

As a Group, we engage across our businesses to share information and learning on cross-cutting and critical issues, particularly where risks are systemic, severe and may require enhanced due diligence.

ABF Sugar recognises the global sugarcane industry is particularly vulnerable to human rights related risks due to its reliance on labour-intensive and seasonal activities such as weeding, planting, cane cutting, and harvesting. It recognises that its long-term success relies on upholding the respect and dignity of its workforce, supply chain workers and other stakeholders. The division aims to ensure that 'Decent Work' conditions – as defined by the International Labour Organization, which includes paying fair wages, providing safe working conditions, and promoting dignity and equality – are respected across its operations.

Additionally, to better assess the inherent risks in its supply chain, ABF Sugar has refined its country risk assessment approach this year, using a number of external tools. The updated methodology serves a dual purpose: first, to trial an early warning process for its businesses, identifying in which countries potential risks, including those related to human rights, are more likely to occur. Second, and more strategically, it enables the businesses to make more informed purchasing decisions by evaluating and prioritising countries based on their risk profiles.

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The Grocery businesses in the UK require suppliers of raw materials and other key commodities to complete a self-assessment questionnaire, and upload results of any ethical audits conducted onto the Sedex (Supplier Ethical Data Exchange) online database. Any issues identified are escalated to the Grocery Group Corporate Responsibility Leads as well as Technical and Procurement contacts within the individual businesses. The UK business follows an internal escalation and remediation policy, which results in engagement with the supplier where necessary to resolve the issues raised. All identified risks are continuously monitored and evaluated for improvement. The completion rate of the self-assessment questionnaire rose from 60% to 90% this reporting year.

Twining's Ovaltine is developing a due diligence process which includes evolving its 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 Twining's Community Needs Assessment (TCNA), and its Modern Slavery Awareness training programme. The FMIP includes a risk assessment of tier one suppliers, which takes into account labour rights risk and the importance of the supplier to the business. Based on this assessment, high-risk suppliers (defined as those with significant potential for human rights and labour rights issues) are audited by an independent third-party at least every three years, and some more regularly based on the audit findings and remediation requirements. Low and medium-risk sites undergo ad hoc semi-announced spot check audits, where suppliers are given a two week window for an audit to be conducted. More than 100 audits of tier one suppliers are conducted each year, including those commissioned by the suppliers themselves upon request of Twining's Ovaltine, which are carried out by third-party auditors. Where audits identify non-compliances, suppliers are required to take action to resolve the issues within a specified time frame. The programme covers selected tier one suppliers including third party partners and joint ventures producing finished products (such as co-manufacturers, co-packers, licensing partners, packing houses, packaging suppliers and raw material suppliers). It also includes site service providers (such as construction and solar panel providers), branded promotional items, warehousing and own production sites. Twining's Ovaltine is also a member of Sedex (Supplier Ethical Data Exchange) online database and where appropriate uses the platform to inform its supply chain assessment process for tier one sites.

Twining's doesn't own any tea estates, the business is dedicated to understanding and where possible addressing the needs of the communities from which it sources its tea and herbs. To achieve this, the business developed the Twining's Community Needs Assessment (TCNA).

The TCNA focuses on learning directly from the workers, farmers and community members through focus group discussions, interviews, surveys and observations. This approach allows Twining's to gain a first-hand understanding of the challenges and aspirations of these communities and identify any areas for improvement.

The TCNA covers ten areas related to human rights and worker welfare, including labour rights, housing, water sanitation, health, gender equality, livelihoods, farming practices, land rights and natural resources. This holistic approach allows Twining's to identify specific issues and develop targeted interventions that help to address the needs of each community.

Business updates

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

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

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

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

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Training

Ensuring that businesses provide training to raise awareness of the risks of modern slavery continues to be a key focal point for ABF.

Our online training module is designed to raise awareness of modern slavery. The course seeks to educate staff within our businesses on modern slavery and forced labour, providing real-life examples, and highlighting the importance of managing known risks. The course also outlines how those operating in our businesses' supply chains can help to address the risk of modern slavery and human trafficking.

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

Business updates

ABF Sugar businesses are required to train their staff and grower partners on issues such as child labour, forced labour and safety. This includes online training for all head office staff at ABF Sugar and each of the businesses every three years, training for all new starters, and in-person training.

Primark delivers training directly to employees in relevant roles through dedicated training seminars designed to promote awareness and mitigate and prevent risks. Primark has trained 320 suppliers and 455 buying and merchandising colleagues on this costing method. Primark continues to train and upskill its product teams on the importance of implementing responsible purchasing practices.

ABFI launched an online training module in September 2023 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 was to equip its employees with knowledge and tools they can use to identify and address any issues that may arise.

Twinnings Ovaltine has been implementing mandatory virtual modern slavery training for all staff in supplier-facing roles since 2020. The business has also launched modern slavery training for supplier factories operating in high-risk countries, focusing particularly on tier one factories with a high number of migrant workers. In South India where the risk of forced labour was identified as a key issue following an in-depth assessment in 2023, it provided training for all tea gardens and suppliers in that region in May 2024 and will provide further capacity building where needed.

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Addressing risks – cease, prevent, mitigate

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

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

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

Business updates

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

To drive change, these businesses have implemented a robust framework to evaluate supplier performance against key indicators such as child labour and wages. This approach, combined with increased on-site engagement, has led to tangible improvements.

In July 2024, a delegation from the Grocery Group visited Turkey to gain a better understanding of vine fruit production and strengthen industry collaboration. During this visit, they met with key stakeholders, including government officials and industry representatives, resulting in the formation of a technical group led by the Aegean Exporters Association. This group will focus on standardising farmer documentation, developing a roadmap for improvement, sharing best practices and engaging with labour contractors and government entities.

Primark stopped sourcing from Xinjiang in 2019 as it could no longer conduct effective human rights due diligence there. All Primark product suppliers and their factories are strictly prohibited from using our sourcing products, materials, components or labour originating in any way from Xinjiang. This mandate has been in place since 2020. Primark has a large Ethical Trade team in China which has received specific training on how to monitor for the presence of forced labour. It has doubled the number of inspections conducted in Primark-approved factories throughout China as an additional due diligence mechanism in response to these risks. Any new factories onboarded in China are required to provide a supply chain map, and analysis is carried out to check for the risk of exposure to forced labour in the Xinjiang region.

Primark’s ‘My Journey’ is a training and awareness programme focused on identifying and addressing the risks of modern slavery and forced labour in the hubs of South India and North India.

The programme trains all staff and workers in a factory who are involved in the recruitment and hiring of workers. It helps them understand the potential risks of forced labour involved in these processes, and how they can help to address them, for example, by making sure that all new recruits have contracts that they understand and that they have not paid recruitment fees to secure their job. The programme first launched in 2019 in South India which is a hub for spinning and fabric mills and many workers migrate there from different regions across India. Workers in this region, both local and domestic migrants, have been identified as vulnerable and at risk of forced labour. Recruitment and hiring practices are a key source of these risks.

The programme expanded to manufacturing hubs in Delhi, North India in 2024. Migratory patterns to this region differ to those of South India, but similar risks of modern slavery and forced labour arising from recruitment practices have been identified.

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Business updates

The tea sector

This year, Twinings has continued to focus on its Kenyan supply chain following the BBC Panorama’s expose in February 2023, which highlighted forced labour indicators relating to gender-based violence in two Kenyan tea estates, one of which Twinings was sourcing from. During this year the business has continued to monitor the situation and received an independent report on the estate’s progress towards addressing these serious issues following a separate, independent investigation into the issues detailed in the programme. Twinings’ own monitoring process has also identified other issues in tea gardens in its Indian supply chain, which relate to the

recruitment process of migrant workers in some of its suppliers’ tea gardens. Twinings’ team in India is creating a plan to address these issues.

It is understood that these are complex issues endemic to the tea sector and agriculture as a whole. Nevertheless, in light of the findings and to strengthen its approach, Twinings commissioned an independent human rights specialist to conduct a review of its approach to human rights due diligence and make recommendations to strength it. These recommendations are now being addressed within the Twinings approach.

Spotlight on responsible recruitment

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

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

- Primark supports the Employer Pays Principle (EPP), which means that no worker in its supply chain should pay for their job and that any costs associated with their recruitment should be paid for by the employer, as set out in Primark’s Supplier Code of Conduct.
- Primark’s Supplier Code of Conduct permits suppliers to use agency and contract workers, provided they are afforded the full rights set out in the Supplier Code of Conduct. Primark has provided training to suppliers to ensure they are aware of the risks and Primark’s requirements.
- Primark may conduct additional due diligence on suppliers that hire migrant, contract and agency workers. Migrant, contract and agency workers can be more vulnerable to recruitment practices that may result in forced, indentured or bonded labour.
- where Primark has identified that recruitment fees have been paid by workers, it has worked with the supplier(s) with the objective of providing remedy in the form of reimbursement fees to workers.
- Primark does not source from supply chains with severe risks of forced labour, including through recruitment practices, and where it is unable to conduct due diligence in full. It is for this reason that in September 2022 Primark announced it would be conducting a responsible exit from Myanmar. This followed a report by the ETI into the garment sector in Myanmar following the military coup in February 2021. Primark’s exit process involved extensive consultation with a range of stakeholders including IndustriALL, the global union which represent workers in the garment industry.

Primark’s My Life initiative has been designed to address the risks that vulnerable people face, particularly domestic migrant workers and women in factories in Primark’s finished goods supply chain. For example many of these workers have a poor understanding of their rights or what factories should provide, for instance employment documents in a language that they can read and understand. Running since 2017, the My Life initiative equips workers with essential life skills in three key areas:

communication skills, knowledge of worker rights and workplace health practices. The training is delivered in an active, participatory and engaging format known as the ‘play-based approach’ and has been adapted to fit local needs, including language requirements. Last year, an independent assessment of the My Life programme’s impact was conducted by independent social impact organisation 60 Decibels who surveyed 545 workers. The findings revealed that the programme has positively impacted Workers’ perceptions across the key areas of communications and rights and responsibilities. For example, 95% of respondents stated that their communications skills had either ‘very much improved’ or ‘slightly improved’. When disaggregating the results from an even sampling by migrant workers and non-migrant workers, the results show bigger improvements for migrant workers. For example, 70% of migrant workers reported their communications skills had ‘very much improved’ compared to 50% of non-migrant workers. This trend is replicated across various criteria underscoring the initiative’s success in addressing the needs of the most vulnerable workers.

In Thailand, Ovaltine has partnered with the Issara Institute to implement an Inclusive Labour Monitoring (ILM) programme in three supplier factories that employ a significant number of more vulnerable migrant workers. The programme aims to empower workers by giving them a platform to voice their concerns through a multilingual hotline, a smartphone app, and direct worker interviews carried out by Issara. This initiative not only facilitates the reporting of grievances related to recruitment and workplace conditions but also aims to address and remediate these issues. Through this collaboration, Ovaltine is supporting its suppliers in Thailand on a journey to enhance responsible recruitment practices and improve the overall working conditions for all workers involved in the programme.

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

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Grievance mechanisms

ABF encourages an open culture in all dealings between employees and people with whom we and our businesses come into contact. Honest communication is essential if malpractice and wrongdoing are to be identified and dealt with effectively. Our Speak Up Policy sets out guidelines for the employees of ABF and its businesses who wish to raise issues in confidence; these could include forced labour concerns. We provide an external advisory service for all staff, including casual or agency staff, and make every effort to protect the confidentiality of those who raise concerns.

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

For example, Primark is committed to making effective and accessible grievance mechanisms available to all its colleagues and people in their supply chains. This includes:

- having grievance mechanisms which allow for anonymous reporting;
- expecting all Primark-approved factories to have grievance mechanisms available to their workers that are effective as defined by UN Guiding Principles on Business and Human Rights (UNGPR) criteria;
- working with third parties, including NGO, to support the implementation of industry-wide grievance mechanisms in our sourcing countries and support existing ones. An example is the Amader Kotha Helpline in Bangladesh, an external and independent grievance mechanism operated by a third-party LRQA (formerly Elevate) and a local NGO, Phulki, to provide workers with a confidential and accessible means to raise concerns and access remedy; and
- developing a separate, widely available, Primark-funded grievance mechanism that is accessible to all workers and relevant stakeholders in its supply chain, called Tell Us.

Business updates

This year, Primark launched a Primark-funded grievance mechanism, Tell Us, that will ultimately be accessible to all workers and relevant stakeholders in its supply chain. Launched in Bangladesh in December 2023, Tell Us was rolled out to a further 21 countries by the end of July 2024, for suppliers making goods both for resale and not for resale. Primark plans to continue expanding this hotline to more of its sourcing and retail locations by the end of 2025.

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

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Measuring progress

Our businesses develop appropriate measurements for their supply chains and operations and monitor their progress and performance against these as they deem appropriate. Several of our businesses have internal key performance indicators in place in relation to human rights risks, while some report on these through their modern slavery statements.

Examples from our businesses of their key performance indicators and areas monitored include:

- internal staff and supplier training, and awareness of forced and trafficked labour issues;
- policies relating to forced and trafficked labour;
- actions taken as part of collaborative initiatives to address modern slavery;
- Supplier Code of Conduct non-compliances relating to employment being freely chosen and related indicators such as forced overtime;
- registered grievances relating to any form of forced labour; and
- investigative and remedial actions taken in response to any risks of forced labour.

Business updates

Primark tracks and monitors the following key performance indicators to assess the effectiveness of its actions to address modern slavery:

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

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

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Communicating

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

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

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

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 30 October 2024.

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