

Our statement on modern slavery

Introduction

The UK Modern Slavery Act 2015 (the 'Act') requires business to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. We are fully committed to playing our part in eradicating modern slavery and we firmly advocate for transparency and collaboration to eliminate the risks of modern slavery.

This statement refers to the financial year ending 30th September 2020. It sets out the steps taken by us to prevent modern slavery and human trafficking in our own operations and supply chains.

Entities that are within Noble Foods Group that are required to comply with the provision to produce a modern slavery statement are: Noble Foods Ltd, Noble Desserts Holdings Ltd, Noble Foods, Noble Logistics, Noble Green Energy, Noble Egg Innovations and Plant Heads.

Our Business - Noble Foods Group

Noble Foods are the leading supplier of fresh eggs to UK retailers.

Many of Noble's eggs come from independent egg farms (we work with approximately 300 across the UK) in many cases with hens and feed also supplied by us. Company owned farms complement this egg production. Additionally, we have 13 rearing farms with the capacity to rear around 4 million pullets per year. Our rearing farms provide birds for both Company owned laying farms and for sales to independent producers.

Our Milling Division is fully approved under the feed industry's Universal Feed Assurance Scheme (UFAS) and registered with the British Egg Industry Council Lion scheme. All mills are registered to manufacture medicated feeding stuffs, registered with the Local Authority under Feed Hygiene Regulations and are fully approved under a number of retailer schemes with Finmere and Thornton also approved for Organic Feed production. We currently manufacture in excess of 750,000 tonnes of feed annually.

Our Poultry Processing Business Unit is the largest spent hen and broiler breeder processing operation within the UK. Processing to the very highest welfare standards required by our customers and the RSPCA, the site is RSPCA Assured, Red Tractor Assured, Tesco Welfare Approved, and currently accredited to the BRC A standard. It also operates an Environmental Management System which complies with the requirements of ISO 14001 and an Occupational Health and Safety Management System which complies with the requirements of ISO 18001.

We acquired Gü which manufactures premium desserts for distribution in the UK and Europe and in 2015 we acquired a renewable energy company, now named Noble Green Energy, this Company focuses on supporting farms reducing their energy costs by employing sustainable practices.

Our Commitment

We are committed to preventing slavery, forced labour, harmful child labour and human trafficking in all our activities and require that our suppliers have the same commitment.

As a responsible company we always strive to do the right thing, we have had robust practices and policies in place for many years to help us meet this objective. We are committed to communicating openly and transparently with all stakeholders to ensure that our zero-tolerance stance is shared by everyone we work with.

Policies in relation to slavery and human trafficking

Our policies clearly state that we will not tolerate forced labour (including human trafficking) or child labour in our operations or operations related to supply to Noble Foods. We conduct internal and external audits to ensure compliance, we work collaboratively and proactively with the GLAA and operate the following policies that describe our approach to the identification of modern slavery risks, together with the steps to be taken to prevent slavery and human trafficking in our operations:

We will not knowingly use any individual or organisation to source and supply goods or workers using practices of forced labour or human trafficking for labour exploitation. We will report any evidence or suspicion of cases of hidden third-party labour exploitation to the GLAA immediately. Failure by managers and leaders of the Company, third party labour providers or organisations in the supply chain to act upon concerns of worker maltreatment, coercion or harassment will be regarded as a gross misconduct offence or breach of contract and will be managed accordingly through the relevant disciplinary or contractual termination processes.

Whistleblowing Policy. We actively encourage all our colleagues to report any concerns that raise suspicions related to human trafficking, both inside our organisation and through the supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. In 2017 Noble Foods introduced the Safe Call confidential and anonymous whistleblowing hotline. In the financial year 2019/2020 5 calls were received through the line, all of which were thoroughly investigated and concluded, none of the calls related to modern slavery.

Case Study: One of the calls received through Safe Call in 2020 related to a provider within our supply chain. On receipt, a full site audit was carried out and an action plan put in place. We supported them with expertise from HR, Health and Safety and Technical and as a result all actions were closed out quickly. In addition to the support, which is ongoing, we have also provided some management training which has been well received.

Recruitment Policy. We will not use any individual or organisation to source and supply workers using practices of forced labour, human trafficking for labour exploitation, payment for work-finding services or any work-related exploitation such as forced use of accommodation. We confirm (through our recruiting processes or through the recruiting processes of third party agencies) that workers are not subject to any of the above practices and will report any evidence or suspicion of cases of hidden third party labour exploitation to the GLAA immediately.

Agency workers. We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from them. Regular audits of a random selection of agency workers, regular audits of each agency as well as audits of new agencies beginning to supply us are part of the processes by which risks of slavery and human trafficking are addressed in relation to agency workers. All agencies used for temporary labour in the manufacturing

of our products are licensed by the GLAA. We actively check these and audit them on a regular basis. Temporary workers are also interviewed to look for signs of any potential breaches.

Business Integrity Policy. Our Business Integrity Policy clearly communicates to colleagues the actions and behaviour expected of them when representing us. We strive to maintain the highest standards of conduct and ethical behaviour including when operating and managing our supply chain.

Risk Assessments and Audits

We expect our suppliers to operate to the same ethical standards that we employ ourselves. Noble Foods is an AB Member of Supplier Ethical Data Exchange (SEDEX) and we have been building SEDEX membership progressively across our group and supply base.

As an active supporter of 'Stronger Together', we have completed the Stronger Together Progress Monitoring Tool. This is a pioneering online self-assessment which supports companies to measure progress being made and to highlight their next steps in addressing modern slavery risks within their business and supply chains. Our starting score is 47% and we are committed to complete this quarterly to measure our improvement.

We have completed the Stronger Together implementation checklist for all our sites. Since starting these assessments in 2019 our site scores have improved from 40-45% to 52-67%. Local action plans are in place and we are committed to reassessing quarterly to measure improvement, share best practise, and ensure action plans are up to date.

Modern Slavery Risks in our Supply Chain

We undertake due diligence when considering taking on new suppliers, and we regularly review our existing suppliers. Our due diligence includes:

- broadly mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking;
- conducting supplier audits or assessments through Noble Foods own staff and third-party auditors which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through own staff/ third party auditors and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular ("Stronger together", "Ethical trading" initiatives).
- Issuing all our suppliers with our Supplier Code of Conduct

Additionally, we play an active role in FNET (Food Network for Ethical Trade) which is a collaboration between suppliers and retailers. We play an active role in the worker representation group and throughout 2020 have been a key contributor to COVID-19 measures, risk assessments and audit management.

Case Study: As a result of the self-assessment questionnaire we issued all our contract producers in 2019, we have recruited an audit team to work with our Regional Farm Managers supporting our producer base completing ethical and social audits twice a year.

Relevant training

We provide information on “Hidden Labour Exploitation” to our workforce through a variety of formats such as workplace posters, worker leaflets, presentations during our induction and training period and through internal auditing processes. We also actively encourage colleagues to report cases of hidden third-party labour exploitation, investigating and acting on any reports as appropriate.

In 2020, 32 senior managers completed ethical and human rights training with Ngage and Responsible Recruitment training was delivered to the HR teams and Operational managers.

The ‘Stronger Together - Understanding & Tackling Modern Slavery’ course content has been delivered to operational employees and continues to be provided to all new employees in order to educate the workforce and enable them to recognise and report the symptoms of slavery and human trafficking.

We had an objective to deliver Stronger Together training to more of our producer base in 2020, sadly COVID-19 restrictions have delayed this initiative. Further to the excellent feedback from the Ngage training, we are now working with Ngage to deliver webinars for our producer base in 2021.

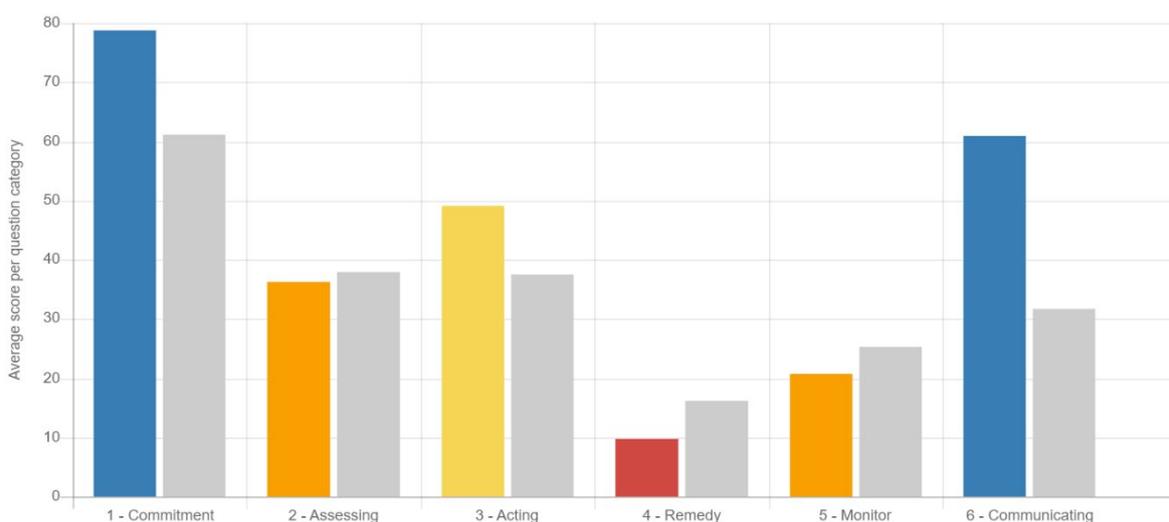
KPI's

We are committed to monitoring our progress in relation to modern slavery and ethical trade and will do this through the completion of the Stronger Together Progress Monitoring Tool as a group and by local site assessments using the Stronger Together implementation checklist.

Our current score as a group for the Stronger Together Progress Monitoring Tool is 47%.

The below graph depicts our results (the coloured bars) against other organisations that have completed the tool (grey bars).

Results - Overview



Our key focus areas for 2021 are:

- Development of robust Internal response and remediation plans
- Development and implementation of a consistent and effective supplier appointment process
- Improvement of all individual site action plans with a target to achieve 75% at each site

In 2020 we established a cross business and cross functional ethical working party that meets quarterly to drive our ethical action plan and to monitor our progress against our commitments.

This statement will be reviewed and published annually.

This statement was approved by the board of Noble Foods.

A handwritten signature in black ink, appearing to read 'Duncan Everett', written in a cursive style.

Duncan Everett
Chief Executive Officer
23rd February 2021