

Anti-Slavery Policy Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Pabulum has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

At Pabulum we have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, subcontractors, seconded workers, contractors, external consultants, third-party representatives and business partners.

- **Staff awareness.** We continually communicate our approach and policy via routine operations conference calls (held on Mondays) and publish the policy on our internal intranet (Pabunet); these are conducted by the Head of People.
- **Assurance arrangements** for suppliers and partners. We continually secure confirmation from our suppliers and partners that they have Anti-Slavery policies in place.
- **Major supply chain procurement contracts.** We continually seek to include certain obligations relating to modern slavery and any applicable policies or supplier codes of conduct. The code of conduct would set out an organisation's expectations with regard to preventing modern slavery in its supply chain. To assist in managing the risk of modern slavery in the businesses of indirect suppliers (eg Bidfood and Foodari), such a code would include an obligation on direct suppliers to take measures to ensure that their own supply chains are free from modern slavery.

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