



Modern Day Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps taken by Karro Food Group and Youngs Seafood Ltd operating under Sofina Foods to prevent modern slavery and human trafficking occurring in our business and supply chains.

Sofina Foods forms part of a global food business that has operations in the UK, Europe and Canada.

1. Organisational Overview

The European part of the privately owned food manufacturing group, trading as Sofina Foods, is a leading supplier of pork and seafood products which operates a vertically integrated supply chain encompassing livestock breeding, raw material sourcing, butchery, processing, packaging, and distribution.

Our customer base includes major retailers, food service providers, wholesalers, and third-party suppliers, reflecting the breadth and resilience of our operations.

2. Our Commitment

We are committed to upholding human rights and ensuring that modern slavery and human trafficking have no place in our operations or supply chains. We take a zero-tolerance approach and strive to work only with partners who share our ethical standards.

3. Our Supply Chain

Our supply chain is complex and brings with it many challenges. It includes:

- **Livestock Farms:** As well as our own breeding units, we source pigs from contracted farms across the UK. These farms are subject to regular audits and must comply with our animal welfare and labour standards.
- **Fish Supply:** Auditing is a fundamental component of our supply chain management. Sourcing from countries including UK, Iceland, Vietnam, China and the USA, we conduct regular site visits to assess operational standards and ensure the fair and ethical treatment of workers throughout our network.
- **Feed Suppliers:** Feed is sourced both internally in our mills, and also from agricultural producers, some of which operate in regions with higher risks of labour exploitation.
- **Transport and Logistics:** We work with third-party hauliers and cold chain logistics providers. We assess their labour practices, particularly when sub-contracting is involved.

- **Processing Facilities:** We employ a mix of permanent and temporary staff, closely monitoring internal and external recruitment practices to prevent exploitation, especially of migrant workers.
- **Packaging Suppliers:** Packaging materials are sourced from UK and international suppliers. We assess their ethical sourcing policies and labour conditions.
- **Labour Providers:** We use licensed labour agencies for seasonal and temporary roles. All agencies must be GLAA-registered and comply with our Responsible Recruitment Policy and comprehensive audits are undertaken annually along with supplementary self-assessment and reporting.

We recognise that certain areas of our supply chain across our pork and fishing base, such as fishing vessels, temporary labour arrangements, overseas suppliers, and sub-contracted logistics, present elevated risks of labour exploitation. These high-risk areas are prioritised within our due diligence, compliance, and audit frameworks. To address these risks, we have implemented targeted measures including enhanced supplier vetting, focused audits, worker welfare assessments, and closer scrutiny of recruitment practices. Our approach is designed to identify and mitigate potential issues early, ensuring that ethical standards are upheld throughout our operations.

4. Policies and Governance

We have implemented a number of robust policies to support our ethical commitments to provide clarity and ensure appropriate standards are followed, including:

- **Supplier Code of Conduct**
- **Internal Code of Conduct**
- **Responsible Recruitment Policy**
- **Whistleblowing Policy**
- **Anti-Slavery and Human Trafficking Policy**
- **Remediation Policy**
- **Human Rights Policy**
- **Child Labour Policy**
- **Ethical Trading Policy**

A number of these policies are embedded into our standard terms and conditions, supplier contracts and internal governance frameworks, and we actively work with all stakeholders to ensure compliance and provide support if necessary; we are also creating a suite of policy training activities to further support this.

5. Due Diligence and Risk Assessment

We conduct regular risk assessments and supplier audits, focusing on:

- **Labour conditions and recruitment practices**
- **Country and sector risk profiles**

- **Sub-contracting and agency labour use**
- **Worker welfare**

We use third-party ethical audit frameworks such as BRC and SEDEX where appropriate and hold A/B membership. Our sites undertake cyclical, semi-announced two and four pillar Smeta audits with the results available via the SEDEX portal.

6. Training and Awareness

Our training function creates and delivers bespoke targeted training to employees including agency workers, across all levels covering:

- **What is Modern Slavery**
- **How to recognise the signs and indicators**
- **What to do if they have a suspicion that modern slavery is present in the business**
- **Key internal contacts to support appropriate action on receipt of a suspicion or report**

Training of Directors, Managers, Employees and Workers commences from the first day of employment and is refreshed regularly via on-line sessions and/or face to face training.

7. Monitoring and Reporting

We monitor compliance through:

- **Annual supplier self-assessments**
- **On-site internal and external audits and worker interviews**
- **Incident reporting and whistleblowing channels**
- **External media stories and industry updates**

As part of our ongoing monitoring within our fish operations, we acknowledge the concerns raised by workers' rights groups regarding certain practices within the broader fish industry supply chain. In response, we have conducted a comprehensive review of our supplier base and introduced additional controls to strengthen oversight and accountability. We continue to monitor these relationships closely to ensure compliance with our ethical requirements.

Any breaches of our policies are subject to formal investigation and may result in contract termination and/or referral to the appropriate authorities.

8. Exploitation Prevention Plan

We are committed to continuous improvement and constantly review our internal procedures across our whole business including:

- **Expand ethical audits to high-risk suppliers**
- **Strengthen worker voice mechanisms by upscaling our whistleblowing advertising and awareness campaigns**
- **Collaborate with industry bodies, customers and suppliers**
- **Continue to upgrade our training and awareness programme**

9. Business Commitment

Sofina Foods are committed to the declarations set out in this statement. We have a reputation of being a reliable supplier that operates to high standards across animal welfare, social development and ethical practice.

We have earned our reputation by consistently living by our Core Values and Guiding Principles, both of which underpin our Sofina Foods Blueprint. In all our actions and business activities our commitment to preventing exploitation is a natural extension of these values.

We are proud to be part of an organisation that takes this issue seriously and dedicates meaningful time and resources to addressing it.

10. Subsidiary Approval

On behalf of Sofina Foods, I approved this statement on 30th March 2025.



Helen Watts

Chief People Officer, Sofina Foods Europe

11. Group Approval

On behalf of Sofina Foods Ltd trading as Sofina Foods, I approved this statement on 30th March 2025.



Ash Amirahmadi

Chief Executive Officer, Sofina Foods Europe

This statement is a declaration of Sofina Foods Ltd and all and any entities under its direct or indirect control trading as Sofina Foods including but not limited to: Karro Food Group Ltd; Karro Food Ltd; Karro ICT Services Ltd; Karro Food Frozen Ltd; Karro McGees (ROI) Ltd; FJG Logistics Ltd; T S Bloor & Sons Ltd; Carroll Cuisine Unlimited Company; Callan Bacon Company Ltd; M&M Walshe Ltd; Stirchley Bacon Co. Ltd; and Young's Seafood Ltd.