



ARGENT FOODS

## MODERN SLAVERY STATEMENT 2025

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the Argent Foods Limited group's ("Argent Foods" or "Group") activities which continue to support and demonstrate our commitment to mitigate the risks of modern slavery and human trafficking in our businesses and supply chains during the year ending 31<sup>st</sup> December 2025.

### OVERVIEW & STRUCTURE

Argent Foods is a diversified food group focused on the processing, procurement, supply and marketing of fresh fruit and poultry. The main trading entities are OrchardWorld and Norton Folgate Marketing (TOFCo) and Belwood Foods.

As a Group we pride ourselves on being a fair employer to our workforce, operating in a manner that is respectful of our employees and compliant with relevant legislation. The respect and protection of human rights continues to be a core belief of Argent Foods and as such we do not accept any forms of modern slavery.

### KEY AREAS IN 2025

- Norton Folgate sponsored two Seasonal Workers Scheme events.
- Refresh of TOFCo induction process, to increase emphasis on modern slavery awareness.
- Subsidiary Senior Management briefings.

### OUR POLICIES FOR MODERN SLAVERY & HUMAN TRAFFICKING

We have core policies in place relevant to the prevention of modern slavery, which are signed off at Board level. This includes our *Preventing Modern Slavery* policy and our *Whistleblowing* policy.

Our *Preventing Modern Slavery* policy sets out the Group's key principles and what is expected from our companies, employees and suppliers to ensure the Group adheres to these principles.

We believe that an open culture is vital to reduce the risk of any exploitation of our people. We encourage all our employees, customers and other partners to report any concerns related to our direct activities or those of our supply chains. This includes any circumstances that may give rise to an enhanced risk of modern slavery.

This is supported by our *Whistleblowing* policy which is designed for stakeholders to make disclosures without fear of retribution. For UK employees, we also have an Employee Assistance Programme which includes confidential helplines staffed with knowledgeable call handlers, who can either offer support on the phone, or direct employees to the appropriate support.

We continually review all of our business and people policies to further cement our commitment in this area, making our stance, processes and support clear and visible to all stakeholders. This is demonstrated in our development of our *Human Rights* policy. The policy outlines the Group's commitment to respecting all international recognised human rights as relevant to our operations and the actions it takes to do so.

## **RISKS & MITIGATION**

The following policies and procedures have been implemented where appropriate across the Group:

- Training for employees through external consultants or e-learning
- Regular discussions around ethics and updates to legislations at Board meetings
- Raising awareness through posters (in multiple languages) and staff meetings
- Inclusion of modern slavery information or internal training within induction
- Development of relationships with external industry, national and global bodies such as Stronger Together (ST), GLAA and FPC
- Requirement for any UK employment agencies that we source from to be registered and certified with the GLAA and have a demonstrable commitment to mitigating the risks of modern slavery
- Reviewing labour providers regularly and only using those that have the correct accreditation
- All TOFCo temporary labour is sourced through ProForce, the first business to undertake the Seasonal Worker Scheme audit programme

## **Supply chains**

Due to the global spread of our suppliers there is an inherent risk of modern slavery within our supply chain. In order to mitigate this the following procedures have been implemented where appropriate across the Group:

- *Due diligence of the supply chain:* prior to engaging a new supplier we evaluate their ethical principles and seek assurances regarding their commitments to protecting human rights through the use of supplier Self-Assessment Questionnaires (SAQs) and information databases, such as SEDEX. All suppliers to TOFCo are required to sign an undertaking annually to demonstrate their commitment to protecting human rights
- *Training:* training is provided to employees who work directly with the suppliers
- *Supplier training:* grower and packing suppliers are encouraged to attend Stronger Together training or other training available
- *ST training sessions:* where relevant we encourage our growers to attend these sessions and the subsequent Taking Next Steps sessions
- *Suppliers:* TOFCo requires all their tier 1 suppliers to undertake a SMETA third-party audit or equivalent
- *Modern Slavery Champions:* all TOFCo UK sites have a Modern Slavery Champion
- *GRASP audit:* growers for TOFCo have been encouraged to undertake GRASP auditing, a GLOBALG.A.P add-on, at grower level as a minimum ethical requirement
- *Refresher:* informal refreshers take place ahead of each TOFCo packing season at British Cherry Growers

## 2025 Collaborations

During the year the Group collaborated with various bodies in our efforts to combat modern slavery:

- Continue to work with Stronger Together in UK, Spain and South Africa
- Membership with SIZA (The Sustainability Initiative of South Africa)

## EFFECTIVENESS

Argent Foods developed key performance indicators (KPI) that were used to monitor the effectiveness of subsidiaries and highlight any areas that need greater focus in 2025. These KPIs include:

- Score achieved on SEDEX RADAR risk assessment tool, which covers:
  - Management systems
  - Training
  - Labour sourcing
  - Recruitment
  - Work records
  - Workplace monitoring
  - Worker engagement
  - Access to remedy

## NEXT STEPS FOR 2026

- The UK Government has announced the establishment of a Fair Work Agency to consolidate labour market enforcement, including action against labour exploitation. We continue to monitor developments in this area and will adapt our policies, controls and escalation processes as further guidance and enforcement arrangements come into force.
- Continue to make TOFCo's UK and international supply chains aware of Stronger Together and Seasonal Workers Scheme events.
- Looking into requesting all British facilities from core TOFCo suppliers to be SMETA audited and growers in core suppliers to be GRASP accredited.

## Supporting the Principles and Standards of:

- Ethical Trade Initiative
- Internal Labour Law
- UK Gangmaster & Labour Abuse Authority
- Supplier Ethical Data Exchange (SEDEX) [www.sedexglobal.com](http://www.sedexglobal.com)
- Stronger Together [www.stronger2gether.org](http://www.stronger2gether.org)

This statement was approved by the Board of directors, who will review and update it annually.

**CEO's signature:**  **Name:** David Gray **Date:** 29 April 2026

This statement also applies to all of our current subsidiary companies, the main trading entities are listed below.

OrchardWorld Limited  
Norton Folgate Limited  
Belwood Foods Limited