

# **Modern Slavery Statement 2025**

Richardson UK Holdings Limited

## OUR GROUP STRUCTURE

This modern slavery statement relates to the year ending 31 December 2025. This statement covers Richardson UK Holdings Limited (“**Richardson**”) and its relevant group subsidiaries listed in the table below (“**the Group**”).

|                                 |                                  |
|---------------------------------|----------------------------------|
| Richardson Milling Limited      | Crisp Malt sp z.o.o              |
| Richardson Milling (UK) Limited | Edme Limited                     |
| Crisp Malt GmbH                 | Micronized Food Products Limited |

Richardson operates in the agriculture and food processing industry. We are the parent company of the Group and our ultimate parent company is James Richardson & Sons, Limited, based in Canada.

The Group has over 350 employees worldwide and operates in the United Kingdom, Poland and Germany.

## OUR BUSINESS

All of the Group’s businesses are located within the UK and EU, where the prevalence of modern slavery and human trafficking is low. We have a mixed workforce of low-skilled and skilled labourers, and office staff in our business.

In the UK, passports of all employees are checked to ensure that they can be legally employed; all employees are employed under a contract of employment and are paid at least the UK minimum wage. As part of our onboarding process for new employees we ensure all employees complete Right to Work checks and we check that employees are being paid into a bank account held in their name.

In Poland and Germany all colleagues are legally employed on appropriate rates of pay.

## CERTIFICATIONS

Members of the Group undertake various audits to confirm compliance with the highest ethical values.

We are independently audited against the British Retail Construction Global Standard. The BRC undertake unannounced audits each year with all our sites and confirm compliance with food safety and workplace standards. The BRC sets recognized standards to help food manufacturers produce safe, legal, and high-quality products.

We are also independently audited against the Sedex Members ethical audit framework, (SMETA) which helps organizations assess and demonstrate compliance with labour standards, health and safety requirements, environmental practices, business ethics, and overall governance.

Through independent SMETA audits, we identify risks, drive continuous improvement, and provide transparency across our operations and supply chains.

Participation in SEDEX validates ethical sourcing, strengthens oversight of labour and human rights standards, enhances supply chain due diligence, and helps demonstrate our commitment to continual improvement and responsible corporate citizenship.

## OUR VALUES

We live our values, and they describe what we stand for and how we behave with our customers, suppliers and investors, in the communities in which we operate and with each other. Our values are:

### Trust

We deliver on our promises. Our customers and partners know we are reliable. We empower our people and trust them to act in the best interest of our business.

### Excellence

From best-in-class talent, facilities, assets, and practices, we are dedicated to excellence in customer service. We are committed to quality and continual improvement.

### Teamwork

We value strong partnerships – internally and externally. When we work together toward a common goal, we are more successful. Respect and fair treatment are integral to how we operate. We are community-oriented.

### Strategic Thinking

We are problem solvers, backed by data and accurate information. We are practical and diligent as we make informed investments that support our continued success.

### Innovation

We are resourceful and we value creativity. We approach our work with vision and initiative.

### Ethical

We are a responsible employer and corporate citizen, driven by integrity and leading by example. We care about the continuity of our operations.

Our commitment to help end modern slavery reflects our values. In particular, we are insistent that our trade with our supply chain, both upstream and downstream, should have a positive impact, creating appropriate opportunities for people all over the world.

## OUR SUPPLY CHAINS

We recognise that the agriculture and food processing industries have a higher prevalence of modern slavery in them since they tend to rely on low-skilled seasonal labour. In addition, raw ingredients used for food processing are often sourced from countries of higher risk. In particular, the Group has identified that there is a possible risk in bought-in supplies of certain labour-intensive food ingredients. As part of our initiative to identify and manage this risk we:

- require suppliers to complete the SEDEX Self-Assessment Questionnaire;

- undertake SMETA Pillar 4 audits;
- complete third party ethical audits in line with our customer requirements. We have a zero tolerance for non-compliance, and work quickly to evaluate concerns if they arise.

## **OUR MODERN SLAVERY POLICY**

Richardson is committed to the highest standards of business ethics and requires that its employees conduct themselves with honesty and integrity at all times.

Our Ethical Trade and Human Rights Policy reflects our commitment to ethical conduct and integrity in all our business relationships. We are committed to establishing and maintaining robust systems and controls to reduce the risk of slavery and human trafficking taking place in our supply chains. As part of this commitment, we undertake internal audits across our business and completed an audit using the Modern Slavery checklist and put an action plan in place. The group adopts the UN Guiding Principles Framework to develop its Ethical Trade & Human Rights Programme.

Each subsidiary within the Group implements our Ethical Trade and Human Rights Policy.

## **CODE OF CONDUCT**

Our Code of Conduct outlines the behaviours we expect of each other at Richardson. We regularly review and monitor our policies and procedures to ensure they are up to date. In addition to our Ethical Trade and Human Rights Policy, we have the following policies which further underpin our commitment to minimising the risk of modern slavery and human trafficking in our business and our supply chain:

- |                                                |                                   |
|------------------------------------------------|-----------------------------------|
| • Anti-bribery and Business Ethics             | • Grievance                       |
| • Anti-Bullying, Discrimination and Harassment | • Group Remediation               |
| • Equal Opportunities                          | • Inclusion and Diversity         |
| • Flexible Working                             | • Whistleblowing                  |
| • Freedom of Association                       | • Working hours                   |
| • Responsible Procurement                      | • Health Protection and Wellbeing |

All employees and suppliers are expected to act with integrity in accordance with the standards of behaviour set out in the Code of Conduct and we provide training and guidance to support employees understanding of our expectations.

## **RISK MANAGEMENT MEASURES**

### **Due Diligence**

The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of our strict policies and procedures as well; the oversight built into our business operations; and the knowledge and skills of our staff.

We also undertake appropriate due diligence when considering new suppliers and regularly review our existing suppliers as well as our own business operations. As part of our due diligence processes in relation to the risk of slavery and human trafficking, we:

- review our supply chain internally to evaluate human trafficking and slavery risks;

- conduct supplier self-assessments and audits using accredited third-party supplier auditors. We use the self-assessments and audits to review and evaluate various aspects of the supplier's business and supply chain including health and safety and the risk of human trafficking and child labour;
- Invoke sanctions against suppliers that fail to improve their performance in-line with an agreed action plan. Serious violations of our supplier code of conduct, lead to the termination of our business relationship.

## Risk Assessments

We regularly carry out modern slavery risk assessments to identify, assess and manage the risk of slavery and trafficking within our business and supply chains. We aim to complete an assessment at least annually. We assess risk based on a number of factors such as geographical risk indices pertaining to human rights, the level of supply chain control, external governance factors and levels of political stability.

We consider that the greatest risk of slavery and human trafficking in our supply chain is where we undertake procurement activities and where operations and managerial oversight are out of our direct control. To overcome this risk, in addition to the training and awareness discussed herein, and reinforced by our Code of Conduct, we have implemented a number of supplier standards and specific supplier programmes which we expect our suppliers to comply with at all times.

## Monitoring and Evaluation

Our on-site leadership, including our human resource manager and head of business operations, all have responsibility for ensuring compliance with this policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the directors of the company who have overall responsibility for ensuring this policy complies with the company's legal and ethical obligations.

## Training and Awareness

We address risks of modern slavery and human trafficking in our supply chains and our business through human rights training and awareness of the social accountability standard SA8000.

Human rights awareness training has been further directed to personnel who work in human resources and corporate affairs. Specific supplier standards training is directed at procurement personnel. More general awareness is available throughout the wider organisation through our Code of Conduct.

We provide further guidance and training to support employees understanding of expected behaviour, particularly in respect of their business decisions and the Code of Conduct.

In addition to the due diligence processes set out above, we:

- encourage our employees to report any concerns about suspected modern slavery within the business or in relation to any of our suppliers to their manager or any company director;

- provide modern slavery training to employees in sensitive positions to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

## **CONCLUSION**

It continues to be a priority for Richardson Maltings Limited to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking in our organisation and supply chains.

We expect anyone who has or seeks to have a business relationship with any member of our Group to familiarise themselves with our Ethical Trade and Human Rights Policy and to act at all times in a way which is consistent with our values, which reflect our respectful and non-exploitative relationships with our principal stakeholder groups: customers, shareholders, suppliers, and team members.

We oppose modern slavery in all its forms, and we ask the same of all with whom we have business dealings.

This statement was approved and signed by the Board of Richardson Maltings Limited in June 2026.