



MODERN SLAVERY STATEMENT 2026/2027

CONTENTS

ABOUT OUR BUSINESS

SUPPLY CHAIN AND SUPPLIER DUE DILIGENCE

OUR POLICIES AND GOVERNANCE

POLICY STATEMENT

RECRUITMENT AND EMPLOYMENT PRACTICES

IDENTIFYING RISK AND PRIORITISING ACTION

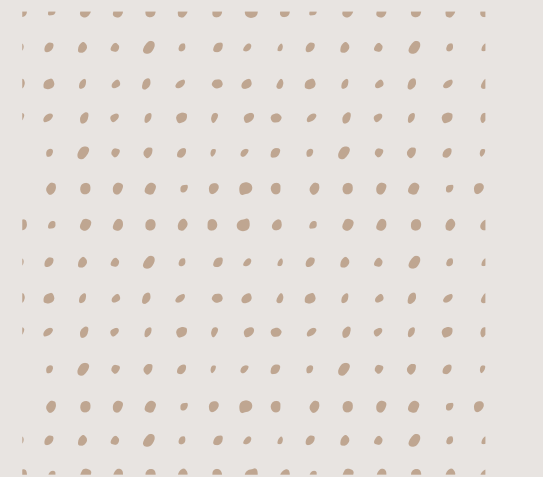
TRAINING AND AWARENESS RAISING

REPORTING AND CONCERNS

COMPLIANCE AND MONITORING

RESPONSIBILITY FOR THE POLICY

REVIEW OF THE POLICY



ABOUT OUR BUSINESS



Founded in 1994, Anchor Sandwich Co. planted its roots in Ashford, Kent as a family-owned business. Over the years, our business has grown alongside our family while maintaining the same values, passion, and commitment to quality that have been at the heart of the company since its establishment. We continue to take pride in producing high-quality chilled ready-to-eat food products, including sandwiches, baguettes, wraps, salads, and other food-to-go solutions for customers throughout the United Kingdom. Our business serves a diverse range of sectors including education, healthcare, hospitality, travel, leisure, and workplace catering.

Our operations encompass food production and packing, ingredient sourcing, cold-chain storage, distribution and logistics, and the management of agency and temporary labour. As a responsible food manufacturer, we recognise that the food production sector can be vulnerable to labour exploitation and modern slavery risks. We are committed to operating ethically and implementing effective systems and controls to prevent any form of modern slavery, human trafficking, forced labour, or exploitation within our business and supply chain.

A handwritten signature in black ink that reads 'M. SARMAD'.

Muhammad Sarmad

Managing Director

SUPPLY CHAIN AND SUPPLIER DUE DILIGENCE



Anchor Sandwich Co. recognises that effective management of modern slavery risks extends beyond our direct operations and into our supply chain. All new suppliers are subject to a supplier approval process before business is undertaken. All suppliers are required to complete our Supplier Approval Process, which includes risk assessments, review of supplier documentation, verification of food safety and quality standards, and evaluation of ethical employment practices. Suppliers may be required to provide evidence of compliance through insurance documentation, BRCGS certification, audit reports, and other relevant records.

Suppliers are expected to comply with all applicable employment laws and demonstrate a commitment to preventing modern slavery and human trafficking. Risk-based due diligence may include supplier questionnaires, ethical trading declarations, third-party certifications, audit reports, and supplier site audits where appropriate. Existing suppliers are regularly reviewed as part of our supplier performance.

POLICIES AND GOVERNANCE

Policies

Anchor Sandwich Co. is committed to conducting business responsibly, ethically, and with respect for human rights throughout its operations and supply chain. Our commitment to preventing modern slavery, forced labour, human trafficking, child labour, and worker exploitation is supported by a framework of policies, procedures, and governance processes designed to promote ethical business practices and protect vulnerable workers.

The following policies support our approach to managing modern slavery risks and are communicated to employees, labour providers, suppliers, contractors, and other relevant stakeholders:

- Modern Slavery and Human Rights Policy
- Supplier Approval and Responsible Sourcing Procedure
- Supplier Code of Conduct
- Ethical Trading Policy
- Recruitment and Employment Policy
- Whistleblowing Policy
- Grievance and Complaints Procedure
- Equal Opportunities and Anti-Discrimination Policy
- Worker Welfare Policy
- Agency Labour Management Procedure

These policies establish clear expectations regarding legal compliance, ethical recruitment, fair treatment of workers, freedom of movement, freedom of association, prevention of debt bondage, and responsible sourcing practices. Modern slavery considerations are embedded within our recruitment, procurement, supplier approval, labour provider management, and compliance processes to ensure risks are identified and managed effectively.

GOVERNANCE

Anchor Sandwich Co. recognises that strong governance is essential for the effective management of human rights and modern slavery risks.

The Managing Director has overall responsibility for the effectiveness of the Company's Modern Slavery Programme and receives updates on modern slavery risks, supplier due diligence activities, workforce compliance monitoring, audit findings, and corrective action plans.

The Senior Management Team provides oversight of the Company's approach to ethical trading, worker welfare, and supply chain risk management. Modern slavery performance, emerging risks, and compliance activities are reviewed periodically to ensure that appropriate controls remain in place.

Responsibility for implementing the Company's modern slavery commitments is shared across several business functions:

- **Human Resources** – responsible for ethical recruitment, right-to-work verification, employee welfare, training, and grievance management.
- **Procurement and Supply Chain** – responsible for supplier approval, supplier due diligence, ethical sourcing assessments, supplier monitoring, and responsible purchasing practices.
- **Technical and Compliance** – responsible for supplier audits, compliance reviews, corrective action monitoring, and maintaining ethical standards throughout operations.
- **Operations Management** – responsible for ensuring compliance within production, packing, storage, and distribution activities, including oversight of agency and temporary labour.

POLICY STATEMENT

Anchor Sandwich Co. is committed to conducting business responsibly, ethically, and with respect for fundamental human rights. We operate a zero-tolerance approach to modern slavery, human trafficking, and any other form of worker exploitation. We are committed to ensuring that these practices do not occur within our operations or supply chains. This commitment reflects our dedication to ethical business practices and compliance with the principles of the UK Modern Slavery Act 2015. applies to all employees, agency workers, contractors, suppliers, and business partners. We expect all parties working with or on behalf of Anchor Sandwich Co. to uphold the same high standards and comply with all applicable employment and human rights legislation.



RECRUITMENT AND EMPLOYMENT PRACTICES

Anchor Sandwich Co. is committed to fair, transparent, and lawful recruitment practices. All employees are recruited through approved recruitment processes and are employed voluntarily. Prior to employment, we verify each individual's identity, Age and legal right to work within the United Kingdom in accordance with Home Office requirements. Original documentation is reviewed, checked for authenticity, and securely recorded. We do not retain workers' passports or personal identification documents, and employees remain free to terminate their employment in accordance with their contractual obligations.

All employees receive a written contract of employment outlining their terms and conditions, rates of pay, working hours, and employment rights. We ensure that all workers receive at least the National Minimum Wage or National Living Wage, as applicable, and are provided with a safe and respectful working environment. Recruitment fees are never charged to workers, either directly or indirectly. Any concerns regarding unfair treatment, coercion, discrimination, or exploitation are investigated immediately.

IDENTIFYING RISK AND PRIORITISING ACTION

We adopt a risk-based approach to identifying and managing potential modern slavery risks within our business and supply chain. Particular attention is given to areas where workers may be more vulnerable, including agency labour, temporary labour, migrant workers, labour-intensive production activities, logistics services, and suppliers operating within sectors known to present higher risks of labour exploitation.

Risk assessments are conducted periodically and whenever significant changes occur within the business or supply chain. Where risks are identified, management will prioritise actions based on the likelihood and severity of the potential impact. Appropriate mitigation measures may include enhanced supplier monitoring, additional worker interviews, targeted audits, corrective action plans, or increased management oversight.

Internal Ethical Audit Programme

Anchor Sandwich Co. is committed to maintaining high ethical standards throughout its operations. We operate an internal ethical audit programme designed to monitor compliance with employment legislation, worker welfare requirements, and ethical labour practices across our production facilities, storage operations, and distribution activities. The programme includes reviews of labour providers, agency worker management processes, recruitment practices, and working conditions. Particular emphasis is placed on worker engagement and confidential employee feedback to help identify potential risks and ensure all workers are treated fairly and with respect.

Agency Labour and Temporary Workers

Agency and temporary workers play an important role in supporting our food manufacturing and distribution operations. We recognise that workers engaged through labour providers may be more vulnerable to exploitation and therefore require additional protections. We conduct compliance checks on labour providers to ensure they operate legally and ethically, including verification of worker contracts, right-to-work documentation, pay arrangements, and employment conditions. Regular reviews are carried out to maintain compliance and promote worker welfare across all sites

Whistleblowing and Reporting Concerns

Anchor Sandwich Co. encourages employees, agency workers, suppliers, and other stakeholders to raise concerns about unethical conduct, labour exploitation, or modern slavery. Workers may report concerns through management channels, Human Resources, or confidential reporting procedures. Individuals raising concerns are protected from retaliation, and all reports are treated seriously, investigated appropriately, and handled confidentially.

Findings and Continuous Improvement

Throughout the reporting period, Anchor Sandwich Co. has continued to strengthen its due diligence processes, supplier monitoring activities, and workforce compliance checks. While no instances of modern slavery, forced labour, or human trafficking have been identified within our operations, we recognise that the risk remains present within the wider food manufacturing sector. We therefore remain committed to continuous improvement, ongoing vigilance, and enhancing our controls to protect workers and uphold human rights across our business and supply chain.





TRAINING AND AWARENESS RAISING

At Anchor Sandwich Co., we recognise that training and awareness are essential in preventing modern slavery, labour exploitation, and unethical employment practices. We provide ongoing training and guidance to employees involved in recruitment, workforce management, and supplier oversight to ensure they understand their responsibilities in identifying and addressing potential risks.

All new employees receive induction training that includes information on our commitment to ethical business practices, worker rights, equality, and the prevention of modern slavery and human trafficking. This training outlines the indicators of labour exploitation, reporting procedures, and the importance of maintaining a safe and respectful working environment for all workers.

Our Human Resources, Recruitment, and Management teams receive additional guidance on right-to-work verification, ethical recruitment practices, worker welfare monitoring, and compliance with employment legislation. These teams play a critical role in ensuring that all workers, including agency and temporary employees, are employed fairly and legally.

Training Delivered During the Reporting Period

During the reporting period, Anchor Sandwich Co. continued to strengthen awareness of modern slavery risks across the business. Targeted training sessions were delivered to managers, supervisors, Human Resources personnel, and colleagues responsible for overseeing agency labour and labour provider relationships.

The training focused on recognising the warning signs of labour exploitation, understanding the vulnerabilities associated with temporary and agency workforces, conducting appropriate welfare checks, and escalating concerns through the correct reporting channels. Additional emphasis was placed on maintaining ethical labour standards within our food production, packing, storage, and distribution operations.

REPORTING AND CONCERNS

We encourage all employees, agency workers, suppliers, and contractors to raise concerns about suspected unethical practices, exploitation, or modern slavery. Reports can be made through management channels, Human Resources, or confidential reporting procedures. Every concern is treated seriously, investigated appropriately, and managed with confidentiality and respect.

COMPLIANCE AND MONITORING

To ensure ongoing compliance, Anchor Sandwich Co. regularly reviews policies, procedures, and operational practices relating to modern slavery prevention. Monitoring activities include supplier assessments, internal audits, labour provider reviews, and management oversight. Findings are used to identify opportunities for improvement and strengthen our controls against exploitation

RESPONSIBILITY FOR THE POLICY

Overall responsibility for the implementation and effectiveness of this policy rests with senior management. Managers across all departments are responsible for ensuring compliance within their areas of responsibility, while all employees have a duty to support and uphold the principles contained within the policy. Leadership is committed to promoting ethical conduct and continuous improvement in this area.

Monitoring Our Progress in Preventing Modern Slavery

KPI Area	Measure	Target
Supplier Due Diligence	Suppliers assessed for modern slavery risks through audits and approval processes	8% annually
High-Risk Suppliers	High-risk suppliers subject to enhanced due diligence reviews	8% annually
Ethical Auditing	Supplier ethical audits completed	8% annually
Employee Awareness	Employees receiving modern slavery awareness training during induction	100% of new starters
Management Training	Management completing modern slavery training	100%
Worker Welfare	Worker welfare interviews and engagement activities completed	Ongoing throughout the year
Reporting & Investigation	Modern slavery concerns reported and investigated	100%
Corrective Actions	Corrective action plans implemented and closed within agreed timescales	100%
Labour Provider Compliance	Approved labour providers reviewed for legal and ethical compliance	100%
Governance & Policy Review	Modern Slavery Policy and governance framework reviewed	Annually

REVIEW OF THE POLICY

Anchor Sandwich Co. is committed to ensuring that its Modern Slavery and Human Rights Policy remains effective, relevant, and fully aligned with legal requirements, industry best practice, and the evolving risks within the food manufacturing sector. To support this commitment, the policy is formally reviewed on an annual basis by senior management alongside key stakeholders from Human Resources, compliance, ethical trading, and operational teams. This structured approach ensures ongoing oversight and accountability at a senior level.

In addition to the annual review cycle, the policy may be updated at any time in response to changes in legislation, regulatory guidance, business operations, supply chain structures, labour provider relationships, audit findings, or newly identified risks. As part of this process, Anchor Sandwich Co. assesses the effectiveness of its existing controls, including due diligence procedures, recruitment practices, supplier management, training programmes, whistleblowing mechanisms, and monitoring activities. Feedback from employees, agency workers, suppliers, auditors, and other stakeholders is also considered to support continuous improvement and strengthen safeguards against modern slavery and labour exploitation.

Any updates or revisions to the policy are approved by senior management and communicated clearly to all relevant employees, suppliers, labour providers, contractors, and business partners. Updated policies are shared through appropriate internal and external communication channels to ensure continued awareness, understanding, and compliance across the organisation. Through this regular review process, Anchor Sandwich Co. maintains a robust and proactive framework for protecting human rights, promoting ethical business practices, and preventing modern slavery throughout its operations and supply chain.



ANCHOR SANDWICH CO.