2025

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made by Dunbia (UK), a division of Dawn Meats Group, in accordance with section 54 of the Modern Slavery Act 2015 and sets out the actions Dunbia (UK) has undertaken to manage the risk of slavery and human trafficking from occurring in the Dunbia (UK) business or any part of its supply chain. Dunbia (UK) recognises that the risks of such abusive practices are real and are perpetrated in a way that makes them difficult to detect. Persistent and ongoing vigilance is required so that people working within Dunbia (UK) and its supply chains are safeguarded and protected from the potential of such abuse. This report sets out the progress Dunbia (UK) has made in the reporting period 1st January 2025 through to 31st December 2025 and the actions proposed for the coming period.

Dunbia (UK) is one of the leading red meat processors in the UK and has been operating as a family business since 1976. In 2017 Dunbia merged with Dawn Meats Group ("Dawn"), another large and highly reputable family business that has been in operation since 1980. Dawn, like Dunbia (UK), prides itself on its strong, board-driven focus on effective ESG and sustainable business practices, the governance of which is overseen by the Group Sustainability Executive, led by its CEO.

Dunbia (UK) continues to meet the expectations of its customers, suppliers and employees, to deliver high standards of ethical trading in its operations and supply chains. The 13 factory sites and the legal entity are listed here:

Legal Entity: Dunbia (UK)

Sites: Dunbia Sawley, Dunbia Preston, Dunbia Llanybydder, Dunbia Dungannon, Dunbia Carnaby, Highland Meats, Dunbia Cumbria, Dunbia Cross Hands, Dunbia Cardington, Dunbia West Devon, Dunbia Treburley, Dunbia Halesowen, Dunbia Jaspers

Dunbia (UK)'s values highlighted and illustrated below will support the goal of eliminating the risk of modern slavery from its supply chains.

- We are customer focused
- We are committed to a sustainable supply base

- We respect, empower and engage with our people
- We are dedicated to excellence and continuous improvement.
- We act responsibly

Dunbia (UK) customers want a supply chain which supports brand protection and protects their reputation as a socially responsible business. Having a sustainable supply base means a commitment to nurturing relationships, finding solutions to common challenges and improving standards. Respecting, empowering and engaging people means developing a culture where poor behaviour and bad practices have nowhere to hide. Seeking continuous improvement means always wanting to get better, challenging one another and recognising good work. Acting responsibly can only be achieved by treating all stakeholders with respect and demanding this respect in return from the supply chain.

Supply Chain Structure

The Dunbia (UK) supply chain is rooted in UK agriculture through its sourcing of livestock from over 15,000 Red Tractor assured farms across Great Britain and Northern Ireland. Unlike other agricultural sectors, this element of the UK farming sector has a low bought-in labour demand and consists largely of family owned and managed farms.

Dunbia (UK) buys the majority of its retail packaging and production consumables from key suppliers based in the UK and Europe. Dunbia (UK) has identified production consumables as having a diverse supply chain. In 2025 Dunbia (UK) continued its review of the supply chain mapping process to allow enhanced monitoring and management of risk.

A growing part of the Dunbia (UK) business is the production of added value, ready to cook and meal solutions, which introduces a much more complex global supply chain through the sourcing of other food ingredients. The Ingredients Category is managed by a number of Cross Functional Departments including New Product Development, Food Safety and Quality, Site Ingredients Purchasers, whilst being overseen by the Group Strategic Procurement Team. We have a small select ingredient supply base comprised of chosen partners and contingency suppliers.

Sourcing labour for Dunbia (UK) operations is a key part of the supply chain. In 2021, Dunbia (UK) became a Licensed Sponsor under the New Points Based Skilled Immigration System, this is a privilege which brings with it a number of key responsibilities and obligations. The principle of ensuring that no worker suffers a financial detriment during recruitment is a key driver for ourselves, to mitigate the potential risk of exploitation via debt bondage, but also of doing the right thing via responsible recruitment. The Executive Board have unanimously endorsed this project and its driving principle, with the covering of all recruitment and sponsorship costs,

none of which are rechargeable to the individual. Employing colleagues either directly, or through agency-based labour providers, Dunbia (UK) is extremely proud of its workforce and the role they play in making Dunbia (UK) the success it is today.

Policies and Practices

Dunbia (UK) operates its supply chain in compliance with its ethical trade policy, supplier code of conduct, business code of conduct, sustainable procurement policy, supply chain risk management model and a suite of supplier screening and tendering process documents. These controls are applied through supplier onboarding, risk-based screening, contractual requirements and ongoing review to support the identification, assessment and management of modern slavery risks. All policies are reviewed and updated as appropriate.

Dunbia (UK) is an AB registered member of SEDEX and uses this platform to support the management of its supply chain relationships with customers and suppliers.

The Dunbia (UK) standard group purchasing agreement places a contractual obligation on all qualifying new group suppliers to register and link via SEDEX and conduct Self-Assessment Questionnaires. Completion of this process forms part of the supplier approval route and supports screening prior to onboarding, with follow-up actions taken where additional assurance or clarification is required.

Dunbia (UK) has established a Group Ethical Trading Committee, which is responsible for developing the Dunbia (UK) ethical trading strategy, setting annual ethical trading objectives and reviewing the Ethical Trade Strategy and related Policies. The Committee also reviews emerging risks, monitors progress against actions and escalates material issues through the appropriate governance channels. The Group Ethical Trade Committee reports to the Sustainability Executive.

The company has an established independent confidential and multilingual whistleblowing hotline which can be accessed by all colleagues either by telephone or by website. Access is available 24 hours per day, 7 days per week, 365 days per year. Posters are located at key points across all UK sites promoting the need to report wrongdoing at work. It is our ambition and commitment to tackle hidden labour exploitation and abuse. We have multilingual posters located at key points across all sites with a shared telephone number linked to our multilingual hotline. Contacts relating to human trafficking, labour exploitation or abuse are escalated without delay to designated managers and subject matter leads so that concerns can be assessed, investigated and responded to appropriately. Our ethos is prevention, protection and remedy.

Dunbia (UK) has an established Human Resources team with a bespoke background and knowledge of the agrifood processing sector, which creates a robust internal governance

structure comprising of; a HR Director, a Group HR Manager, a Group HR Projects Manager, a Group Ethical Compliance Manager, a UK Group Recruitment Manager, a UK Recruitment Team, which provides a central support function for site-based HR Managers and teams.

Risk Assessment and Due Diligence

The Company considers its supply chain in four key constituent elements of agriculture, material suppliers, ingredients, and labour provision. Dunbia (UK) has risk assessed each element of its supply chain and has initiated strategies that it considers proportionate. Dunbia procures through short, direct and transparent supply chains. In 2025 the Group Ethical Trading Committee reassessed the key supply chain risks. This review informed targeted due diligence activity across the supply chain, including screening, approval controls and monitoring measures in higher risk areas.

Livestock and Agriculture

Within the company supply chain, the Director of Livestock Procurement is responsible for modern slavery ethics.

Dunbia (UK) has deemed this supply chain to be low risk regarding modern slavery, as it primarily consists of family-owned farms mainly employing family members.

Dunbia (UK) are working with industry organisations, such as the Red Tractor Assurance Scheme, to monitor and manage the risk of modern slavery and to take action if and where appropriate.

The Dunbia (UK) Livestock Procurement team regularly visit farms, building strong relationships with local farming communities.

Material Supplies

A cross-functional team, comprised of Group Strategic Procurement and Auditory Compliance, is responsible for assessing and mitigating the risks of modern slavery in the procurement of non-livestock products.

Material supplies represent a significant proportion of annual spend at Dunbia (UK) and several key suppliers play a critical role in supplying packaging products that carry product to customers, to retail shelves, and ultimately to the end consumer. The company has assessed these key suppliers as being of critical importance to the Dunbia (UK) supply chain and brand.

To accelerate change, Dunbia (UK) has taken an approach to risk assess its entire supply chain. All high-risk suppliers identified are prequalified and complete a technical based Self-Assessment Questionnaire (SAQ). This screening process is used to assess supplier risk before approval and to identify where enhanced due diligence, further evidence or additional follow-up

is required. New high risk and reassessed existing suppliers to the Group undergo a prequalification process and the request will be made for suppliers to become registered members of Sedex, thus linking with Dunbia (UK). Supplier approval is therefore supported by documented prequalification, SEDEX linkage and review of submitted information before onboarding is completed.

Dunbia (UK) has identified that having longer term supply contracts increases supplier trust and transparency.

Ingredients

The Dunbia (UK) use of food ingredients is very small as a percentage of products manufactured and the supply base consists of UK, Ireland and European based ingredient manufacturers, primarily for greater visibility. However, the company recognises that given the nature of the supply chain in the upstream sourcing of commodity ingredient components that this supply chain is both complex and truly global, involving countries where modern slavery is a higher risk than it is in the UK. Dunbia (UK) is a member of the Food Network for Ethical Trade and key members of the Strategic Procurement team have been engaged in understanding the extensive nature of the supply chain to increase their knowledge and engagement in this area

Labour Provision

Responsibility for managing the risk of modern slavery in the labour supply chain is led by the HR Director, supported by the Group HR Manager, cascaded to site HR and supported by the Group Ethical Compliance Manager.

Dunbia (UK) is a member of the Home Office ECHO Group. The objective is to develop a positive working relationship between the Home Office and employers and to assist with a better understanding of how to prevent illegal working, enforcement issues, the support services available to employers and to exchange information about current trends and future activities.

Dunbia (UK) like many food businesses in the UK is required to respond to significant seasonal changes in production demand which calls for a flexible and responsive labour supply chain. Dunbia (UK) recognises this is a critical area to manage and during 2025 continued utilising electronic identity checking of employees in addition to expanding the training of HR staff in response to new right to work regulations, processes and required evidence. Identity fraud is common in human trafficking and introducing these control mechanisms are designed to both detect and safeguard against the risk of human trafficking. A reliable automated solution for authenticating the integrity of passports, ID cards, visas and residence permits is in place as an extra safeguard. This facility which is aligned to meeting each new colleague entering the business, allows us to inspect and scan all national and international passports and ID documents currently in circulation. These checks support right to work compliance, help

identify document irregularities at the point of onboarding and provide an additional level of assurance in higher risk recruitment scenarios. Support is available from our partner expert helpdesk.

Dunbia (UK) has progressively rationalised the number of agency labour providers it uses and has established a group register of approved labour providers as part of its improved governance process. Only providers that meet the required approval criteria are added to this register, enabling closer oversight and more consistent monitoring of labour supply arrangements.

Labour providers are assessed across a range of criteria including the financial standing of the company as a key indicator of the health and stability of the business. The company further developed its engagement of agency labour providers through the rollout of standardised Service Level Agreements. These arrangements support a more controlled approval process and set clearer expectations for compliance, responsible recruitment and ongoing performance review.

On the weekly HR call the Group Ethical Compliance Manager updates the regional and site HR managers on appropriate issues arising.

Training and Capability

The company developed a suite of training materials on Modern Slavery and Human Trafficking as part of its internal awareness raising to combat potential abuse and exploitation of workers. Dunbia (UK) HR managers have received training with the materials in addition to undertaking Stronger Together training. The Dunbia (UK) Compliance and Learning Management Team in conjunction with Stronger Together added a Training Module on to the Learning Management System aimed primarily at our Management and Supply Chain teams. The key objective being to expand existing training on the risks of potential labour exploitation and abuse to key stakeholders.

In 2025, further to the review of statistics and publications including but not limited to UK Government, UK Police and Non-Government Organisations, bespoke reports were shared within the UK HR team on the current and evolving picture of abuse and exploitation within the UK aligned to political governance structures in place.

Bespoke right to work training has been provided to all UK HR teams ensuring full understanding of current right to work legislation. Additional ongoing specialist support provided advice and guidance. In 2025 a wide ranging assessment was undertaken encompassing both the United Kingdom and Republic of Ireland, identifying emerging risks and threats including, but not limited to evolving criminality, such as impostering, fraudulent documentation and exploitation.

Training workshops were rolled out to United Kingdom and Republic of Ireland Human Resources teams post this assessment.

All colleagues entering the business receive training on the risks and threats posed by labour abuse and exploitation as part of the onboarding process. In 2026 a working Group will be set up in order to update this training due to the evolving nature of abuse and exploitation, reflecting current risks and threats.

2026 will see the launch of Human Trafficking First Responder training to the Human Resources teams which will enable key personnel to identify indicators of exploitation and safely refer potential victims through the National Referral Mechanism.

Ongoing refresher training for Senior Human Resources / Compliance Team members as well as training for Labour Exploitation risks.

Additionally our future business leaders as part of their development programme undertook Modern Slavery training which included a workshop facilitated by a lived experience survivor which bridges theoretical knowledge and the abhorrent nature of these abusive practices.

Dunbia (UK) supports the principle of Responsible Recruitment. Service Level Agreements clearly set out that suppliers shall not charge a worker any 'finder's fee' or charge any obligatory fee for providing work. Additionally, suppliers must be members of an appropriate trade body and are committed to raising the standard of UK labour provision.

The Strategic Procurement Team numbers were expanded in 2024 and they undertook bespoke training in Ethical Trade and Sustainable Procurement best practices. There is ongoing monitoring and review of best practice with team updates as appropriate. Site buyers also received Ethical Trade training and this is scheduled once yearly to upskill. The Strategic Procurement team host weekly calls with the site buyers to identify new risks and promote best practices. The Strategic Procurement team actively engages in additional training including but not limited to Stronger Together training in order to be aware of evolving risk.

Measuring Effectiveness

Dunbia (UK) measures the effectiveness of its ethical trading initiative through KPIs relating to incident reporting through its whistleblowing hotlines, and the incident management escalation process via the ethical trading committee. The company will continue to develop and refine its success measures in line with the Group Sustainability Strategy and remains committed to ensuring modern day slavery issues do not occur within the business and its supply chain. This will continue to be a key focus for the business in 2025. In order to monitor the effectiveness of

the steps taken to prevent slavery and trafficking taking place in our business and supply chain, it is intended to use the following performance indicators:

Detailed monitoring /recording of all complaints received via our whistleblowing lines.

Tracking of ongoing training of existing and new people on Modern Slavery to ensure a full understanding of the commitments of the Modern Slavery Act and ethical trading initiatives and delivery of in-house and external ethical training awareness.

- An annual audit of all Labour providers.
- Commitment to continuous improvement and annual review of our recruitment and induction practices.
- Translation of current protocols into the most commonly spoken languages where appropriate.
- Tracking the number of longer term supply contracts.
- Identification and introduction of best practice initiatives.
- Identification of current potential risks and threats via education and collaboration.

Statement Approval

This statement has been formally approved by the Dunbia (UK) Executive and its shareholders on 30th June 2026

Signed:

Niall Browne, CEO