EST. 1836
CARR'S
MAKING GREAT BAKING MOMENTS

MODERN SLAVERY STATEMENT

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Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that we have taken, and continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chains. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.

"Modern Slavery" is a term which covers slavery, servitude, forced labour and compulsory labour and human trafficking. It can take many forms including, but not limited to, exercising ownership over a person; coercing or threatening someone to perform work they would not do voluntarily; and arranging or facilitating another person's travel with a view to them being exploited (even where the person consents to the travel).

Overview

Carrs Flour Mills Ltd is one of the UK's largest flour millers operating from 3 main locations, namely Kirkcaldy, Silloth and Maldon. Carrs Flour Mills employs around 200 employees across the UK.

We produce bulk and bagged flours as well as bran products for our customers ranging from large industrial food manufacturers and retailers to small local bakers. We also supply co-products to manufacturers of animal feed. Grain is sourced from approved suppliers including larger co-operative, farmer-owned grain stores and general merchants with some off-farm supplies.

The Board of Directors for Carrs Flour Mills includes the Managing Director and Sales Director. This Board reports to a Board of Directors for Whitworth Holdings Ltd, which is the umbrella company, also based in the UK.
We work closely with our main suppliers and customers; with our employees and their representatives (including Unite and USDAW, our recognised unions); and with other trade bodies such as UK Flour Millers, and we comply

with the SMETA Best Practice Guidance to ensure the highest level of compliance with food manufacturing standards and ethical trading initiatives.

Responsibilities

The **Directors** of CFM are responsible for overseeing our efforts to eliminate modern slavery. Progress is measured regularly and is on our rolling agenda for Board meetings.

The **HR Department** and our **Line Managers** are responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, and that any agencies used are appropriately checked and commit to ethical standards.

Line Managers are responsible for upholding our "core values" and for ensuring that employees who work for them also behave in accordance with these.

Our **Supply Team** is responsible for ensuring that appropriate checks are made prior to any orders being placed with new suppliers, and our **Sales Director** and **QA Department** work with our major customers to provide them with appropriate information on our modern slavery policy and to gain suggestions and feedback.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This statement reflects our commitment (and details the action we have taken) to act ethically and with integrity in all our business relationships and in implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Actions

Carrs Flour Mills complies with SEDEX Best Practice Guidance.

Employees: all new employees are appointed directly and checks are made regarding their right to work in the UK. We conform to the ethical trading standards. There is no forced, bonded or involuntary labour. Staff turnover is very low and all overtime is voluntary. Our Employment and HR policies are based on current legislation. Our policies include a Whistleblowing Policy and are accessible to all employees in electronic and hard copy formats.

Agency workers: we only use agency workers sparingly, for temporary placements, and require the providers of agency labour to sign up to the ETI Base Code. In order to ensure that there is no forced, bonded or child labour, Line Managers check during the induction of any agency worker that he/she is aged over 16, has not paid any recruitment fees in order to procure the work, has not been required to forfeit his/her passport and is free to leave the agency if he/she wishes.

Suppliers: all suppliers are requested to confirm in writing that they observe the ETI Base Code. Suppliers of ingredients and suppliers identified as being higher risk will be assessed on an individual basis and additional assurances sought as appropriate.

In October 2026 we updated our Ethical Statement for Suppliers with a Supply ChainCode of Conduct. Our Supply Chain Code of Conduct sets out full details of the minimum standards for employment and working conditions that we require from oursuppliers.

Customers: we also work closely with our major customers to ensure that we comply with any employment practices and procedures specified in their audits.

Risk Assessment and Due Diligence

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

We consider that the most significant risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

We undertake due diligence when considering new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular products or geographical risk of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risk of each new supplier.
- Conducting supplier audits using accredited third-party auditors where this is considered necessary.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan. Serious violations of our policies lead to termination of our business relationships.

The CFM Board and site management will review progress at quarterly meetings. We will undertake a supply chain mapping and ethical risk assessment process. This will inform future policy. Where there is an identified risk or malpractice, appropriate remedial action will be taken, including the possible delisting of a supplier.

Penalties for Breach

If a supplier is found to be involved in any form of modern slavery, its contract may be terminated either immediately or on its due renewal date, depending on the severity of the breach.

Contractual penalties may be awarded against any supplier for a breach of contract, or for incorrect self-auditing responses, questionnaires or the giving of incorrect information.

If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, they will be subject to the Company's disciplinary procedure.

Training & Awareness

We ensure that we have competence within our organisation, through training relating to human rights and the awareness of the social accountability standard SA8000. Where we feel it is necessary, we will use accredited third-party supplier auditors to work with and advise our management team and employees.

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 relevant policies.

We have updated our whistleblowing policy and have instructed a third party to handle the whistleblowing telephone line, thus ensuring people have a means by which to report issues without having to deal directly with the Company.

Related Policies

We have the following HR policies in place for employees:

- Absence Reporting and Sick Pay Policy
- Adoption Policy
- Bereavement Policy
- Bullying and Harassment Policy
- Commitment to the ETI Base Code
- Core Values Statement
- Child Labour Policy
- Data Protection Policy
- Disciplinary Procedure
- Drugs, Alcohol and Substance Misuse Policy
- Employee Handbook
- Equal Opportunity Policy
- Ethical Standards Policy
- Flexible Working Policy
- Grievance Procedure
- Holiday Pay Policy
- Homeworking Policy
- Learning & Development Policy
- Maternity Policy
- Parental Leave and Time off for Dependants Policy
- Paternity Policy
- Recruitment and Selection Policy
- Redundancy Policy
- Retirement Policy
- Shared Parental Leave Policy
- Stress Policy
- Wellbeing Policy
- Whistleblowing Policy

These are referenced in our Employee Handbook and copies are readily available on our shared network drive in the Company Policies and Procedures folder. Hard copies are kept in folders in those departments without access to a computer.

All HR policies are reviewed regularly to ensure they are legally compliant, in line with our ethical standards and fit for purpose.

Key Performance Indicators for Monitoring and Review

We use the following means to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chains:

- Regularly review and revise our core values and Company policies.
- Record, monitor and follow up complaints raised through our grievance or whistleblowing procedures which relate to modern slavery, ensuring that all necessary remedial action is taken.
- Record suppliers who are terminated due to allegations of modern slavery.
- Ensure our existing suppliers have signed up to the ETI Base Code.

Board of Directors Approval

Carrs Flour Mills will never knowingly enter into a business relationship with any organisation involved with slavery, servitude or human trafficking. The senior management of the company accepts responsibility for the implementation of any policy in relation to this matter and for the provision of adequate resources to ensure that slavery, servitude, or human trafficking is not taking place in the company or its supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Board on 16th October 2026.

Neil Fyfe
Managing Director **Date: 19/10/26**