

## KITWAVE GROUP PLC MODERN SLAVERY STATEMENT

### Introduction

Kitwave Group plc, together with its trading subsidiaries (together “the Kitwave Group”), takes a zero-tolerance approach to modern slavery and human trafficking in its supply chain and across the business. The Kitwave Group is committed to elimination of slavery and human trafficking and this statement is published in accordance with the section 54(6) of the Modern Slavery Act 2015 (the “Act”) for the financial year ending 31 October 2024.

### Group Structure

The Kitwave Group forms a large independent food wholesale group in the UK with 37 depots across England, Scotland and Wales with over 2,100 colleagues and a customer base of over 46,000 businesses in the independent retail sector and the foodservice industry. In addition to this, the Kitwave Group also has its own product range with over 300 products available nationally.

### Group Suppliers

The Kitwave Group has well-established commercial relationships with its suppliers, many of whom are the manufacturers of the products, as well as producing its own label products. The supply chain is often complex and includes overseas elements, however suppliers’ modern slavery statements are reviewed to ensure that their policies and practices aim to prevent modern slavery or human trafficking in accordance with the Act. The Kitwave Group is committed to acting ethically and expects all its suppliers to make the same commitment. The Kitwave Group will address any failures by suppliers to meet its standards on a case-by-case basis and ultimately may lead to the Kitwave Group ceasing to trade with any such supplier.

The Kitwave Group has appropriate policies in place that underpin its commitment to ensure that there is no modern slavery or human trafficking in its supply chains or in any part of its business. Policies are continuously reviewed and updated.

### Within the business

The Kitwave Group has a number of HR policies and procedures that demonstrate compliance with UK Employment Law including: Employee Code of Conduct, Recruitment Policy, Equality & Diversity Policy and Anti-Bribery Policy. All the policies and procedures are readily available to colleagues in the Employee Handbook.

The Kitwave Group provides every colleague with written terms of employment and pays every colleague in accordance with the law. Compliance with legal obligations to ensure the health and safety of colleagues is prioritised.

When employing colleagues for a temporary period of work via an employment agency, the Human Resources team perform checks on the employment status of the agency workers to ensure compliance with UK employment regulations.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chains and business, the Kitwave Group ensure that key colleagues are aware, and implement, the policies and procedures that are in place in respect of modern slavery or human trafficking.

## Reporting

The Kitwave Group positively encourages colleagues to report any unlawful activity and/ or any activity which may be in breach of policies and procedures through the Whistleblowing Policy. This includes any circumstances which may give rise to an enhanced risk of slavery or human trafficking.

## Next steps

The Board of Directors of Kitwave Group plc ("the Board") has ultimate responsibility for the implementation of policies and procedures, including those related to ethical trading and modern slavery.

The Board will continue to review and update policies, practices, and procedures on an annual basis. It is recognized by the Board that colleague engagement is key, so it will therefore continue to ensure they are aware and implement those policies, practices, and procedures.

The Kitwave Group will continue to develop awareness in respect of modern slavery and human trafficking with key colleagues.

## Approval

This statement has been approved by Kitwave Group plc's Board on 3 March 2025.

Signed:



**Ben Maxted, Chief Executive Officer**

**For and on behalf of Kitwave Group plc**