



STONEGATE FARMERS LIMITED

ETHICAL TRADE, MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2026

This statement has been published in accordance with section 54 (1) of the Modern Slavery Act 2015. It sets out the steps taken by Stonegate Farmers Limited during the year ending 31st December 2025 to prevent modern slavery and human trafficking in its business and supply chains.

INTRODUCTION

The International Labour Organisation ("the ILO") estimates that almost 21 million people worldwide are victims of forced labour; almost 19 million of those victims are exploited by private individuals or enterprises, generating US\$ 150 billion of illegal profit per year. In response to this atrocity, the United Kingdom Modern Slavery Act 2015 requires larger companies to publish an annual report setting out what, if any, steps they take to ensure that slavery and human trafficking is not taking place in any of its supply chains or in its own business.

There have been many well-reported instances of slavery globally in the farming and agricultural industry including in the UK. We have a zero-tolerance approach to modern slavery and human trafficking within our own operations and our wider supply chains.

OUR BUSINESS

We are a wholesale supplier of shell egg and egg products serving our customers in the food service and retail market throughout England, Wales, Scotland, Northern and the Republic of Ireland.

Our main depot is in Wiltshire where all our customer orders are picked and then the goods are distributed in delivery vehicles to customers. We have customers in England, Wales and Scotland including: High street Supermarkets, Michelin starred restaurants, contract caterers, hotels and pub chains.

We also undertake farming operations in Lincolnshire and Lancashire.

ORGANISATIONAL STRUCTURE

We have 2 companies, Stonegate Farmers Ltd and Stonegate Agriculture Ltd, our accounts for 23/24 were filed at Companies house on 27th June 2025. Accounts for 24/25

Stonegate Farmers Ltd

Lacock Green, Corsham Road, Lacock, Chippenham, Wiltshire SN15 2LZ
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will be filed with Companies House in 2026. As of 31st December 2025 we have 630 employees across both companies.

OUR SUPPLY CHAINS

As of 31st December 2025, we have a variety of suppliers to the business consisting of services, consumables, producers and feed suppliers as well as food ingredient, service, and packaging suppliers. We buy products from many independent producers nationally for our customer base within the UK and European Union.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to workers' rights in our own business and throughout our supply chains, with a primary focus on the abhorrent abuses of slavery and human trafficking. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking are not taking place anywhere in our own business or supply chains.

We have the following policies and documents relating to tackling Modern Slavery in our business and our supply chain:

- Ethical Trade and Human Rights Policy
- Public Interest Disclosure Policy
- Working Hours Policy
- Anti Bribery and Corruption Policy (contained in handbook)
- Eti base code

STEPS TAKEN

- We send our suppliers a Supplier Questionnaire to complete before we commence trading which asks if the supplier has an ethical sourcing policy along with other relevant searching questions.
- All of HR and H&S team have attended training on modern slavery and update their knowledge on a regular basis. Senior team members update knowledge on an annual basis.
- Some of our agricultural field based colleagues have undertaken modern slavery and human trafficking training.
- All of our employees receive information on modern slavery awareness during induction, including a leaflet to keep. We also re-induct our colleagues every 3 years and send refresher information on modern slavery and Eti base code to them on a bi-annual basis.
- Displaying posters and information on modern slavery and the Eti base code in community areas of our buildings.
- Our supply chain employees and internal colleagues have access to a confidential telephone number to call, anonymously if they wish, 24 hours a day, 7 days a week, to report any ethical concerns including modern slavery or human trafficking.
- We are members of Sedex, the Ethical Data Exchange, which is a member organisation for businesses committed to continuous improvement of the ethical

performance of both our internal workers as well as our external supply chains. We are committed to being externally audited (SMETA) every two years to ensure an independent and transparent monitoring process in order to receive regular feedback and continuous improvement.

- We annually audit our temporary agency workers supplier ensuring compliance to the Ethical Base code (Modern Slavery Act & Gangmaster Licensing Standards)
- We are associate members of the Associated Labour Providers and regularly undertake webinars and seminars focussed on the prevention of modern slavery and human trafficking.
- Anti-bribery training undertaken by those who work within supply and procurement.
- Carry out modern slavery checks when recruiting and inducting employees.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, we intend to put systems in place to:

- Monitor potential risk areas in our supply chains and own business.
- Identify and assess potential risk areas in our supply chains and grade all our suppliers with a risk rating of high risk, medium risk, or low risk.
- Use the risk assessment results to manage the risk of slavery and human trafficking occurring in our supply chains and our own business.
- Identify and assess potential risk areas in our own business and supply chain such as the use of agency workers.
- Protect whistle blowers.

ACTION AND RESPONSES TO SLAVERY AND HUMAN TRAFFICKING RISKS

Our aim is that through requiring transparency from our suppliers and by providing them with the knowledge and training they require (where appropriate) we can ensure that the abhorrent practices of modern slavery and human trafficking are not tolerated at any level of our supply chains. We are committed to helping and supporting our suppliers in certain situations where their treatment of workers has fallen below the minimum standards that we expect.

For example, where excessive hours are being worked or where workers are not being provided with a rest break we would seek to educate and train the supplier and then undertake further monitoring. We will only delist a supplier as a last resort if no improvement has been shown where we have detected a problem and taken steps to try and get the supplier to meet our minimum standards.

For the most serious cases of slavery (such as passports confiscated, forced to work for no pay, unacceptable working conditions) we would immediately stop purchasing products from such a supplier. Such abuses are not tolerated but we appreciate that careful consideration is given to each situation to determine the most appropriate response, including supporting any individuals found to be working within these conditions.

We commit to reporting to and working with the relevant government agencies to ensure that our full support is provided to anyone found to be a victim of modern slavery or human trafficking within our supply chain.

TRAINING

We are committed to continuous training on the required understanding of the ETI base code and potential modern slavery situations. This year we will commit to the following:

- The Stonegate Colleague Forum (Workers Council) receiving dedicated training on modern slavery.
- All field based supply chain, procurement, technical services and commercial colleagues to receive dedicated modern slavery training.
- Managers and supervisors in the production and agricultural areas to carryout dedicated online training on modern slavery from Q4 2026.

Chief Executive Officer
Adrian Gott
December 2025