



## Modern Slavery Act Statement

### Introduction

This statement sets out the steps taken by Dr. Oetker (UK) Ltd (“Company”) to understand and address all potential Modern Slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no Slavery or Human Trafficking in its own business and its supply chains. Detailed information on Dr. Oetker’s approach to human rights may be found in Dr. Oetker’s Human Rights Policy statement.

As part of the FMCG industry, the organisation recognises that it has a responsibility to take a robust approach to Slavery and Human Trafficking.

The Company is absolutely committed to preventing Slavery and Human Trafficking in its corporate activities, and to ensuring that its supply chains are free from Slavery and Human Trafficking.

### Organisational Structure

This statement covers all activities of the Company, which is part of the Oetker Group, one of the largest European family-owned companies.

The Company is a frozen and ambient food manufacturer employing 660 people across its two sites in Leeds and Leyland.

### Supply Chains

Dr. Oetker carries out a thorough human rights due diligence process across all its suppliers through a dedicated human rights risk analysis. Suppliers identified as high-risk are required to undergo an on-site social audit. Where audit findings occur, corrective action plans are developed and implemented. To ensure proper implementation of major corrective actions, follow-up audits are scheduled. If a supplier continues to be non-compliant, they are phased out.

Whenever we receive information regarding potential human rights abuses within our supply chain, Dr. Oetker investigates these cases and ensures that appropriate corrective actions are taken.

All suppliers, as part of their contract, are required to comply with the Dr. Oetker Supplier Code of Conduct ([www.oetker.com](http://www.oetker.com)).



## Responsibility and Due Diligence

Overall responsibility for the organisations anti-slavery initiatives lies with the Managing Director. The Executive Head of Human Resources is responsible for the creation of this Statement and for ensuring that training of internal staff is carried out.

## Training

Online training provided by Stronger2gether has continued to be completed during 2025.

All members of the UK Purchasing team have been trained and successfully passed the annual Chartered Institute of Purchasing and Supply (CIPS) Ethical Procurement and Supply Test which looks at Modern Slavery, Corruption, fraud, and sustainable procurement.

In addition, the purchasing team have been trained on the topic of Human Rights and how to identify potential violations of these rights in the supply chain.

## Policies

**Whistleblowing** Dr. Oetker (UK) Ltd is committed to developing and adopting a proactive approach to enable staff, contractors, and visitors, who become aware of wrongdoing, illegality, or unethical conduct within Dr. Oetker and its supply chains, to report their concerns at the earliest opportunity so that they can be properly investigated and addressed. The confidentiality and anonymity of individuals who report suspected wrongdoing under this Dr. Oetker United Kingdom Policy will be maintained as far as reasonably practicable, and staff will not face reprisals for disclosing concerns even if they turn out to be mistaken.

**Recruiter Compliance** The Human Resources Team of Dr. Oetker (UK) Ltd have all read, understood and signed the Recruiter Compliance document which requires all recruiters to act with integrity

**Supplier Code of Conduct;** which applies to all suppliers of the Company requiring strict compliance with the law and compliance with the core ILO labour standards.

**Prevention of Modern Slavery, Human Trafficking and Hidden Labour Exploitation Policy** Dr. Oetker (UK) Limited maintains relationships with many different organisations in its supply chain, as well as directly employing or engaging its own workforce. In light of the provisions of the Modern Slavery Act 2015, this Policy is implemented to ensure a proactive approach to identifying and addressing any instances of Slavery, Human Trafficking and labour exploitation in our business or supply chain.

Dr Oetker Purpose Statement details its commitment to Social and Environmental responsibilities. A main factor within this is to ensure that we promote and maintain a sustainable supply chain while ensuring that we act responsibly. In addition, we have Recruiter



Compliance document which has been reviewed to ensure that we are satisfied that we are sufficient to address the issues surrounding Modern Slavery & Human Trafficking.


### Communication

The Company is committed to raising awareness of the issues surrounding Modern Slavery and Human Trafficking and has taken steps to ensure that posters are displayed prominently on all notice boards. Modern Slavery & Human Trafficking is included within the Company induction, to ensure that all new starters to the business are made aware of this important subject and their individual responsibilities.

### Audits

Dr. Oetker (UK) Ltd understands that exposure to Modern Slavery could be present within the use of its temporary labour. As part of our supplier audit process, the Company audits its temporary labour suppliers on an annual basis to ensure compliance with Modern Slavery laws and has committed to auditing its temporary labour on a quarterly basis to monitor further the risks of Modern Slavery.

This statement covers financial year 1st January 2025 to 31st December 2025 and has been approved by our Managing Director.

Signed by:  
  
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John Brassington  
Managing Director