

Modern Slavery Statement 2026 – 2027 (v2.0)
Golden Acre Foods Group
Golden Acre Foods Limited, GADF Holdings Limited (“GA”)

Introduction

GA is committed to ensuring that modern slavery and human trafficking do not take place in our business operations or supply chains. As a food business operating in the UK, we recognise our responsibilities under the **Modern Slavery Act 2015** and the importance of taking proactive steps to identify, prevent, and address risks of exploitation.

This statement outlines the actions we have taken and will continue to take to ensure ethical, transparent, and legally compliant operations across our business and supply base.

Our Business

GA is a privately owned importer and distributor of food and drink products to the retail, wholesale and foodservice sectors.

Our Suppliers

We operate within the UK food sector, sourcing food and drink products from both the UK and international suppliers. Our supply chain includes:

- Food manufacturers and processors
- Agents & Brokers
- Logistics and transport partners
- Other 3rd party suppliers

Given the global nature of food supply chains, we acknowledge the inherent risks of modern slavery, particularly in regions with weaker labour protections.

Our Protocols

The directors and staff of GA are committed to ensuring that their business activities are ethical and sustainable.

We maintain a framework of policies supporting ethical conduct, including:

- **Modern Slavery and Human Trafficking Policy**
- **Supplier Code of Conduct**, aligned to the ETI Base Code
- **Whistleblowing Policy**, encouraging employees to report concerns confidentially
- **Recruitment and right-to-Work Controls**, ensuring all staff are legally entitled to work in the UK
- **Anti-Bribery and Corruption Policy**
- **EUDR** risk assessment procedures also evaluate how activities may impact indigenous peoples.

Our team share responsibility for implementing and monitoring compliance with these policies.

Certification & Membership

In 2023, GA were proud to be awarded B-Corp status and join the number of companies who align with the B-Corp strategy of aiming to redefine the role of business with the economic system so that every business is a force for good. We are working towards the renewal of our B-Corp certification in 2027.

We also complete the Eco Vardis ESG assessment and are members of the Supplier Ethical Data Exchange (SEDEX) and support the Ethical Trading Initiative.

Due Diligence Processes

Our due diligence approach includes:

Supplier Approval & Monitoring

- Conducting ethical supplier assessments
- Ensuring new suppliers demonstrate compliance with ETI human rights standards before onboarding
- Conducting supplier risk assessments at country and product category levels

2026 – 2027 Actions

To further reduce the risk of modern slavery in our supply chain, we commit to:

- Strengthening the due diligence process on our supply chain through ethical reviews, supplier audits and engagements.
- Conducting modern slavery training for relevant staff.
- Reviewing our supply chain risk assessment process, to ensure we are clearly identifying and acting on risks.
- Further review of EUDR compliance actions ready for the new proposed enforcement date for large & medium enterprises of the 30th of December 2026.

Declaration

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking Statement. It has been approved by the board of Directors on the date below and will be reviewed annually and covers the period 2026 – 2027.



Signed on behalf of the members of the Golden Acre Foods Group

Neale Powell-Cook

Managing Director

