Castell Howell Foods

Anti-slavery and Human Trafficking Transparency Statement

2025-2026

Introduction

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a slavery and human trafficking statement for each financial year of the organisation. The information included in the statement refers to the financial year 2025-2026.

Castell Howell Foods Limited is committed to conducting its business operations ethically and with integrity. We recognise the importance of respecting human rights and preventing modern slavery within our supply chains and operations. We are taking all reasonable steps to prevent the exploitation and abuse of men, women and children at all stages within our supply chain in full support of and compliance with the provisions of the Modern Slavery Act 2015. This transparency statement outlines the steps we are taking to address the risks of modern slavery and human trafficking in our business.

Organisational Structure

Castell Howell Foods operates across nine UK sites and includes the following associated companies:

- Celtica Foods
- Farm Fresh Foods
- Celtic Coast Fish
- Llandeilo Bakery
- Authentic Curry
- Upton Farm

Operations span Cross Hands (main offices, warehouse, distribution, Farm Fresh Sandwich Fillings, Celtica Foods), Carmarthen (Cash & Carry, Farm Fresh Cooked Meats), and depots in Merthyr Tydfil, Avonmouth, St. Martin's, and Porthmadog. Celtic Coast Fish operates from Pontyclun, Upton Farm from Pembroke Dock and Authentic Curry from Hirwaun.

The Company's turnover for the financial year 2024–2025 was £252 million.

Our supply chains

The Company's main business is derived from the purchase and resale of food products from a wide range of suppliers. The majority of those suppliers are based in the United Kingdom, which are regulated by UK legislation in terms of acceptable working conditions, adequate Health and Safety procedures, Working Time Regulations and in compliance with Human Rights legislation. In some circumstances, we purchase products through brokers based in the UK or Europe, whose suppliers may be based outside the UK or the EEC, and may include the following countries: -

Our Policy

Modern slavery is a crime resulting in the abuse of the human rights of vulnerable workers taking various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. We have a zero-tolerance approach to modern slavery and are committed to acting ethically, with integrity and transparency in our business dealings and relationships. We are committed to implementing and enforcing effective systems of control to ensure that modern slavery and human trafficking are not taking place anywhere within either our own business or in any of our supply chains, consistent with our obligations under the Modern Slavery Act 2015.

We have developed and implemented policies and procedures to prevent modern slavery in our operations and supply chains, which includes:

1. An Anti-slavery and Human Trafficking policy, outlining our expectations regarding ethical business practices. We are proud of the conditions of employment that we provide our 900 employees. Our employees are paid at a rate equivalent to, or higher than that of the National Living Wage and their contracts and hours of work are in accordance with the provisions of the Working Time Regulations.

2. Supplier agreements that require compliance with anti-slavery and human trafficking laws. We expect the same high standards from all our suppliers, contractors and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of modern slavery, and expect that our suppliers will in turn hold their own suppliers to the same standards.

   We challenge our suppliers to ensure that slavery and human trafficking does not exist in any part of their business or supply chains, by assessing their current measures through the completion of a supplier questionnaire.

3. Whistleblowing mechanisms to encourage reporting of any suspected cases of modern slavery. Our whistleblowing policy supports the Modern Slavery Act by encouraging staff to report suspected breaches of our policies in the knowledge that their concerns will be taken seriously and investigated as appropriate.

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of unknowingly harbouring illegal or unethical conduct, so a culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

Due Diligence and Supplier Engagement

In keeping with the strengthened expectations under the 2025 guidance, which encourages meaningful due diligence rather than minimal compliance, our supplier controls include:

- **Supplier Modern Slavery Declaration**: Annual confirmation of compliance, including whether the supplier is legally required to publish a statement.
- **Supplier Assessment Questionnaire**: Mandatory for new suppliers, requiring disclosure of anti-slavery policies, due-diligence practices, and supply chain controls.
- **Risk-based follow-up** for suppliers operating in higher-risk regions or sectors.

- **Contractual provisions** prohibiting modern slavery and requiring suppliers to cascade the same requirements through their supply chains.

In addition, new suppliers are assessed through completion of the Company 'Assessment Questionnaire for Suppliers', which comprises of questions pertinent to the provisions of the Act and suppliers are required to provide us with their Company policies in relation to Anti-Slavery, Human Trafficking and Ethical Trading.

Risk Assessment and Management

Our due diligence process focuses on suppliers in high-risk areas and countries that have lower social and environmental standards than in the UK and EEC. If any irrevocable failing is identified through the assessment questionnaire for suppliers, where possible the supplier-customer relationship will be terminated.

We also take steps to mitigate the risk of modern slavery occurring in our own operations:

- Training - We provide training to our purchasing staff and those who are responsible for the management of our supply chain to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and within our organisation. Our employees are encouraged to raise awareness of ethical issues and help uphold our commitment to respect human rights.
- Right to Work Checks - Right to Work checks are completed for all employees upon commencement of their employment with us.
- Whistleblowing - We protect whistle-blowers by providing a clear and confidential reporting line for the disclosure of any breaches of our policies, safe working procedures or legislation. Any concerns will be fully investigated by the Whistleblowing Officer and acted upon accordingly.

Castell Howell Foods Ltd. remains committed to improving transparency in our supply chains and to protecting vulnerable workers from exploitation. We will continue to evolve our approach in line with updated statutory guidance and stakeholder expectations.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Castell Howell Foods Limited Slavery and Human Trafficking statement for the current financial year.

This statement has been approved by the Board of Directors and is signed on its behalf by:

Matt Lewis
Managing Director
Castell Howell Foods Ltd.