

Modern Slavery Statement 2026

Modern Slavery defined as the condition of being forced by threats or violence to work for little or no pay, and of having no power to control what work you do or where you do it.

Portumna Pastry recognises the risk of, and need to combat, modern slavery in all its forms. Our operations impact workers and our supply chains. We will work with colleagues, suppliers, customers and other stakeholders to achieve a high standard of care and ethical behaviour.

1 Policy statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2 About this policy

- 2.1 The purpose of this policy is to:
- 2.1.1 set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and

2.1.2 provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

2.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3 Responsibility for the policy

3.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 The Site HR team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

3.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR team.

4 Your responsibilities and how to raise a concern

4.1 You must ensure that you read, understand and comply with this policy.

4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 4.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.4 If you believe or suspect that a breach of this policy has occurred or that it may occur you must notify your manager, or HR team or report it in accordance with our Whistleblowing Policy as soon as possible.
- 4.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or HR team or through the confidential helpline:
- 4.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your HR team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

5 Training and communication

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 5.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

6 Breaches of this policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

7 SEDEX

7.1 We are a member of SEDEX (Supplier Ethical Data Exchange) a not-for-profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains and as such comply with the ETI base code. SMETA audits and corrective actions are uploaded to the Sedex platform, which allows us to undertake supplier risk assessments and decide on any actions we and the supplier need to take. As a condition of trade, all our suppliers must be registered with SEDEX and give us visibility of their ethical data. We will continue to improve communication on this topic with our supply chain and welcome opportunities to collaborate to identify risks or solve problems that we cannot tackle alone. We will face common issues and by working together, not only with suppliers but also with other companies, we will be far more effective in meeting our common goal of eradicating Modern Slavery.

8 Navex EthicsPoint Confidential Helpline and Website

We have a free, anonymous and confidential whistleblowing hotline that enables all employees, to raise any potential concerns in relation to employment standards or ethics. Information on how to contact the whistleblowing hotline is prominently displayed onsite, along with the contact number on all employees' payslips.

<p>Navex EthicsPoint Confidential Helpline and Website</p>	<p>Telephone: 0800 069 8730</p> <p>Online: http://www.boparan.ethicspoint.com/</p>
<p>Stronger Together Helpline</p>	<p>Telephone: +44 01276 919090</p> <p>Online: http://www.info@stronger2gether.org/</p>
<p>Blue Blindfold</p>	<p>Telephone: 1800 666 111 or 999/112</p> <p>Online: blueblindfold@garda.ie</p>

9. Further Steps

We are committed to building on the progress we have made.

1. Our risk mapping of suppliers will continue as will internal communication and awareness building.
2. We have registered on the Stronger Together website to support our learning and gain access to updated information and resources.
3. We will continue to improve communication on this topic with our supply chain and welcome opportunities to collaborate to identify risks or solve problems that we cannot tackle alone. We will face common issues and by working together, not only with suppliers but also with other UK companies, we will be far more effective in meeting our common goal of eradicating Modern Slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31st December 2025.

10. Our Approach to Remediation

Should an incident of modern slavery be identified in our organization or our supply chain, we will cooperate with the relevant authorities to support any further investigations. We will seek to understand if we have caused or contributed to the exploitation occurring and if it is found that we have, then we will seek to engage with the victim(s), via independent facilitation as appropriate, to explore what remediation is sought and how this is best achieved.

Signature



Name

Patrick O' Donovan

Title

General Manager

