



Modern Slavery Statement

Approved April 2026

Policy Statement

This Modern Slavery Statement applies to On A Roll Sandwich Company Ltd (the Company) and sets out the steps we have taken, and continue to take, to understand and mitigate the risk of modern slavery and human trafficking within our business and our supply chains. The information in this statement relates to the financial year 2025–2026.

Whilst the Company is not legally required to publish a Modern Slavery Statement under the Modern Slavery Act 2015, we do so voluntarily as part of our commitment to ethical, responsible and transparent business practices. We recognise our responsibility within the manufacturing sector to take a robust and proactive approach to preventing slavery, servitude, forced or compulsory labour and human trafficking.

This statement is informed by the principles of the Modern Slavery Act 2015, relevant UK employment legislation, the UN Guiding Principles on Business and Human Rights, and the Ethical Trading Initiative (ETI) Base Code.

Organisational Structure

The Company manufactures fresh and frozen food to go products for a diverse range of customers across the retail, education and healthcare sectors. All manufacturing operations are carried out in the United Kingdom from our production facilities in Middlesbrough, supported by one additional UK distribution site that remains under the control of our manufacturing operation.

Sales of our products are conducted via telephone, email and online channels. Demand for our products remains consistent throughout the year and is not considered seasonal in nature.

The Company operates solely within the UK and is overseen by two shareholders (Director and Company Secretary), supported by an established Senior Management Team.

Risk Assessment

The Company considers the risk of modern slavery within its direct operations to be lower due to the following factors:

- UK-based manufacturing and distribution
- A predominantly directly employed workforce
- Use of GLAA-licensed employment agencies only
- Established HR, compliance and management systems

However, we recognise that modern slavery risks can still exist within UK-based operations, particularly in relation to:

- Temporary and agency labour
- Migrant workers
- Upstream supply chains such as raw ingredients, packaging and outsourced services



We therefore take a cautious and proportionate, risk-based approach to managing potential modern slavery risks.

Commitment

The Company is committed to maintaining ethical and socially responsible business practices and to upholding the rights and dignity of all workers.

We are committed to:

- Prohibiting forced labour, bonded labour, and human trafficking
- Not employing child labour
- Providing safe, hygienic and respectful working conditions
- Ensuring fair pay, at or above statutory requirements
- Preventing discrimination and promoting equality
- Respecting freedom of association

We do not knowingly enter into trading relationships with organisations, in the UK or elsewhere, that support or are found to be involved in slavery, servitude or forced or compulsory labour.

Governance and Accountability

Overall responsibility for preventing modern slavery and human trafficking rests with the Senior Management Team, with day-to-day oversight delegated to responsible managers within HR and site management.

Performance and risk are reviewed annually, and whenever there are significant changes to our operations, labour model or supply chain.

People

The Company actively encourages all workers to raise concerns related to ethical issues, including modern slavery. We promote an open management culture where individuals feel confident to speak up. A formal Whistleblowing Policy is in place across all sites and applies to permanent and agency workers alike.

Modern slavery awareness forms part of our induction process for both permanent and agency workers. Employees are provided with information on how to identify potential indicators of exploitation and how to report concerns confidentially.

We use publicly available guidance and awareness materials from initiatives such as Stronger Together to support worker awareness of modern slavery risks and reporting routes.

Over 85% of our workforce is now employed on permanent contracts. Where temporary labour is required to meet production demands, employment agencies play an important role; however, these agencies are carefully selected, approved and regularly reviewed. We only work with agencies that hold a valid GLAA licence.

The Company strictly adheres to the minimum standards required under relevant employment legislation in the UK and we have further embedded our employment principles by completing a self-assessment questionnaire for our facilities as part of our Sedex membership, which is available to our customers to review, where required.



Supply chains

The Company's supply chains include the purchase of food ingredients, packaging materials, and a range of goods and services from suppliers based in the UK and abroad.

We seek to work with suppliers who share our commitment to ethical trading and responsible labour practices. Our approach to supply chain due diligence includes:

- Supplier self-assessment questionnaires
- Risk based supplier reviews and audits
- Ongoing engagement with suppliers where elevated risks are identified
- Requesting suppliers to adopt their own Modern Slavery or Ethical Trading policies
- Encouraging suppliers to use GLAA licensed labour providers

We recognise that certain countries and commodity sectors may present a higher inherent risk and continue to develop our due diligence processes to address these risks proportionately.

To date, The Company is not aware of having conducted business with any organisation that has been found to be involved in modern slavery or human trafficking.

Actions Taken to Prevent Modern Slavery

During the 2025–2026 financial year, The Company has continued to strengthen its approach by:

- Reviewing supplier contracts to include termination rights where modern slavery risks are identified
- Assessing and monitoring labour providers and recruitment practices
- Maintaining a zero-tolerance approach to modern slavery and providing modern slavery awareness training where appropriate
- Enhancing our management systems through SEDEX membership and self-assessment
- Implementing a Human Rights & Ethical Trading Policy to reinforce expectations internally and across our supply chain

Measuring Effectiveness

The effectiveness of our approach is monitored through a combination of qualitative and quantitative indicators, including:

- Regular review of labour providers
- Supplier risk assessments and engagement activity
- Use of whistleblowing and grievance mechanisms
- Outcomes of internal and external audits

Any concerns raised are investigated promptly and appropriate action taken.

Review and Approval

This statement is reviewed annually and updated to reflect changes in our business, supply chains and risk landscape. It has been reviewed by the Senior Management Team and approved by the Managing Director, demonstrating The Company's ongoing commitment to responsible business conduct and continuous improvement.