



Iberveg UK Ltd
Modern Slavery Statement
Financial Year 2025

INTRODUCTION

Iberveg UK Ltd (Iberveg) is committed to preventing modern slavery and human trafficking in all aspects of our business and supply chains. This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and outlines the steps we have taken during the financial year ending 30 September 2025 to ensure that slavery, forced labour, and human trafficking are not present in our operations or those of our suppliers.

We recognise our responsibility to uphold ethical business practices and are dedicated to continually improving our policies and procedures to combat modern slavery.

This statement applies to Iberveg UK Ltd and its subsidiaries.

Signed



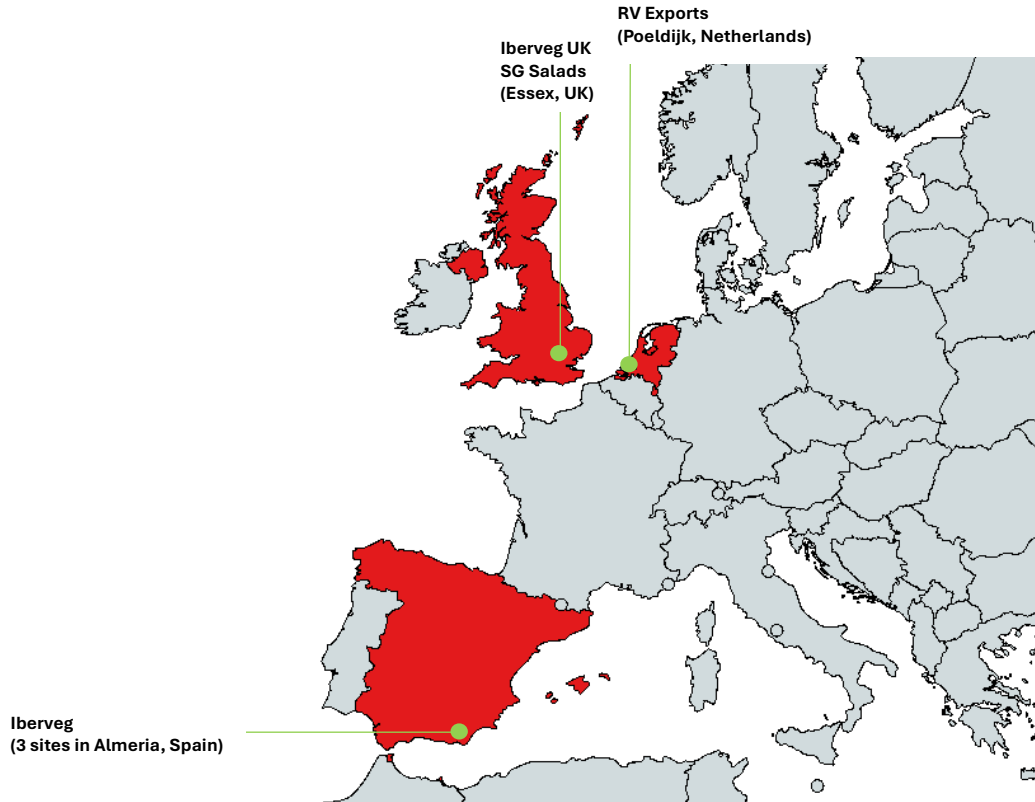
Richard Vater
Managing Director, Iberveg UK Ltd.
16/03/2026

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OUR STRUCTURE, BUSINESS AND SUPPLY CHAIN

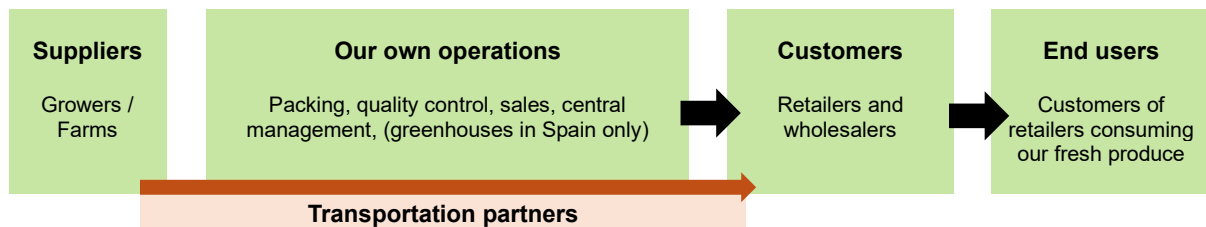
Iberveg is a company specialised in the production and marketing of fresh horticultural products, with operations in Spain, the Netherlands and the United Kingdom. The company supplies both wholesale and retail markets in the UK. The group employs approximately 130 people across Europe, of whom 4 are based at Iberveg UK and 65 at SG Salads, the company's operational site in the United Kingdom.



Iberveg's product range includes cucumbers, tomatoes — sourced exclusively from Spain — peppers, and aubergines.

In 2025, the company collaborated with 16 growers located in Spain, the Netherlands and the United Kingdom. These collaborations are flexible and vary each season according to market demand and requirements.

Our value chain is as follows:



GOVERNANCE AND POLICIES

Governance

The Chief Executive Officer of Iberveg holds ultimate responsibility for human rights and the prevention of modern slavery across the organisation.

In the United Kingdom, the Technical Manager is responsible for leading due diligence processes and works closely with business partners, collaborating with growers to ensure clear and effective communication of the company's human rights expectations.

In Spain, the management of human rights matters, including modern slavery, is overseen by a cross-functional team. This team ensures the engagement and support of key company functions, facilitates the integration of human rights considerations across the business, provides diverse perspectives for developing mitigation measures, and offers practical guidance on the feasibility and implementation of Iberveg's Human Rights Procedure.

The Human Resources Director, in coordination with the executive team, identifies and assesses potential human rights risks within the organisation and implements preventative measures to mitigate or eliminate adverse impacts. Meanwhile, the Administration Director evaluates risks affecting workers' rights and approves the corresponding corrective actions, which are documented and made available to employees through the Human Rights Procedure.

Policies

Iberveg has a comprehensive set of policies and procedures designed to prevent modern slavery and safeguard human rights across its own operations and supply chain. The company is committed to continuously reviewing and strengthening these policies as risks are better identified and assessed, and in response to input from external experts, customers and other stakeholders.

Key policies supporting this commitment include:

- **Social Responsibility Policy**, aligned with the eight fundamental conventions of the International Labour Organization (ILO), covering, among other areas, freedom of association and collective bargaining, the elimination of child labour, the eradication of forced labour, and the prevention of discrimination.
- **Policy on the Prevention and Management of Forced Labour and Hidden Exploitation Risks**, which explicitly addresses human trafficking and sets out measures for its identification and prevention.
- **Human Rights Policy**, covering internationally recognised fundamental human rights and applicable across all group operations.
- **Supplier Code of Conduct**, which sets out minimum expectations regarding human rights, working conditions, and ethical practices, and is communicated to all supply chain partners.
- **Responsible Recruitment Policy**, aimed at ensuring fair and transparent employment practices.
- **Workplace Sexual Harassment Prevention and Response Protocol**.
- **Health and Safety Policy**, designed to ensure safe and healthy working environments.
- **Employee Handbook**, which includes internal policies and procedures such as grievance mechanisms, equal pay, maternity, paternity and parental leave, anti-bribery measures, and whistleblowing channels.

These policies form the foundation of Iberveg approach to identifying, preventing and mitigating risks related to modern slavery and human rights, and support compliance with the obligations set out in the **UK Modern Slavery Act**.

RISK ASSESSMENT AND DUE DILIGENCE PROCESSES

Iberveg due diligence approach for managing the risk of modern slavery is integrated into its broader commitment to respect and promote human rights. The company is progressively strengthening its due diligence processes across the supply chain to ensure alignment with the **United Nations Guiding Principles on Business and Human Rights** and the **OECD Guidelines for Multinational Enterprises**, including their specific guidance on human rights due diligence.

Iberveg considers the risk of modern slavery among its direct employees to be low. The company sources primarily directly from growers, operates a relatively simple supply chain, and maintains stable business relationships, all of which help mitigate this risk. Nevertheless, Iberveg recognises the need to continue strengthening controls and, during 2026, will implement specific measures to improve due diligence on farms during the production period, with particular attention to the accommodation of seasonal workers.

To identify and assess risks relating to human rights and modern slavery, Iberveg has implemented the following measures:

- Conducting an internal human rights risk assessment at its UK operations, which included workplace evaluations focused on materials used, handling processes, and working conditions. Health and safety assessments also involved reviewing accident and incident records, with slip and trip hazards being the most common risks.
- Carrying out a **SEDEX SMETA audit** at the UK facilities in June 2024, followed by the development and implementation of a corrective action plan.
- Requiring all growers in Spain to complete a social and human rights self-assessment questionnaire.
- Requiring **GlobalG.A.P. certification** for all suppliers in Spain and, in most cases, **GRASP certification**, which evaluates farms based on social risk factors, fair labour conditions, and compliance with labour rights.

Looking ahead to 2026, Iberveg plans to develop and implement a new due diligence approach for assessing growers, tailored to their size, operational context, and level of risk.

TRAINING AND AWARENESS

Building our capacity to understand human rights and modern slavery challenges is key to managing, preventing, mitigating and remediating risks and impacts.

Policies and documents are available at sites, many of our workers do not have access to laptops to complete their work so we print out policies and have them available to read in the break rooms at sites.

Members of our management team with responsibility for modern slavery, human rights and worker welfare have completed training on social audits, social management systems procedures and identifying and responding to modern slavery. Some employees have also attended training delivered by Stronger Together.

During 2026 we will reassess further training needs and our Spanish colleagues will be completing training delivered by [Foros Comercio Etico](#), Ethical Trade Forums on modern slavery.

MEASURING EFFECTIVENESS

Working across our technical teams in Spain and the UK we continuously work to understand the effectiveness of our processes. During our next financial year we are instructing an independent consultant to undertake a human rights gap assessment, against the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises to assess the effectiveness of our existing programme. This will result in the development of our human rights action plan for 2026 and beyond.

PARTNERSHIPS

In 2024 we became a member of the [Foros Comercio Etico](#), Ethical Trade Forums in Spain. They are a collaborative initiative established in 2015 to promote better working conditions within Spain's agri-food sector. They bring together various stakeholders, including retailers, importers, exporters, suppliers, producers, and external organizations, aiming to improve labour conditions and ensure the social, economic, and environmental sustainability of the sector.

NEXT STEPS FOR FY26

During 2026 we plan to:

- Undertake a human rights gap assessment
- Improve grower due diligence
- Review policies and training