



MODERN SLAVERY STATEMENT

INTRODUCTION

IRCA Group¹ is committed to acting with integrity and transparency, and it continues to be a priority for us to ensure that we trade ethically, source responsibly and minimise risks of human trafficking and modern slavery.

This statement relates to our obligations under the United Kingdom Modern Slavery Act 2015 (“**Act**”) and is an extension of our Code of Ethics, which defines rules and principles to conduct our businesses within a framework of legality, fairness, transparency, confidentiality, and respect for human dignity, in compliance with the law and regulations of the countries in which we operate. . We are actively implementing and enforcing effective systems and controls to safeguard against any form of human trafficking and modern slavery taking place within our business and our supply chain. We expect the same high standards from all of our suppliers, contractors and other business partners.

This statement applies to IRCA Manufacturing UK Limited and to all entities within the IRCA Group which are subject to the Act.

OUR BUSINESS

IRCA Manufacturing UK Limited is part of the IRCA Group: with its 155 employees and a productive plant located in Peterborough, the company act as a manufacturing company for the principal IRCA S.p.A. with a focus on food products, particularly in the gelato and chocolate industry.

IRCA Group is a global leader in high-quality food ingredients, specializing in chocolate, creams, fillings, fruits, pistachios, and decorations. With over 100 years of Italian heritage, we operate 19 production facilities across Europe, the U.S., and Vietnam, serving customers in more than 100 countries. Through our renowned brands, we provide innovative, trend-driven products and a "one-stop shop" for professionals worldwide. With over 2,000 employees, we help our clients create extraordinary food by offering complete ingredient solutions for pastry, bakery, gelato, and more. We believe in corporate social responsibility and sustainability and are driving a number of initiatives to help the environment and local communities.

DUE DILIGENCE - RISK MANAGEMENT

1. We are committed to implement a regular evaluation of the nature and extent of our exposure to the risk of human trafficking and modern slavery in our supply chain by conducting self-assessment questionnaires, requiring certifications to our commercial partners and adherence to our policies, *e.g.*, the Code of Ethics and the Human Rights Policy.
2. We are committed to implement a proper risk management process. So far, the risk management is led by each company of the Group. In addition, it has been established a Group Ethics Committee, an impartial internal body responsible for monitoring the application of the Code of Ethics and policies adopted by the IRCA Group, and for intervening in cases where due diligence conducted on third parties reveals reports or red flags. To date, the risk is assessed as indicated in the above paragraph. Below Group level, we commit to identify named individuals and specific departments within the organisation to be responsible for our modern slavery risk management.
3. Within the compliance and risk assessment activities we are developing and implementing procedures designed to:

¹ IRCA Group means IRCA Group Luxembourg Midco 4 and all its affiliated companies

- a. risk assess our business and supply chains to identify areas of higher risk.
- b. evaluate the measures currently in place to address areas of risk.
- c. consider and implement measures and control mechanisms (including updating our policies and procedures) to specifically address areas of risk.
- d. embed clear staff training and transparent reporting lines into the business.
- e. continue to monitor the risk level on an ongoing basis; and
- f. ensure ongoing monitoring to continue to assess areas of risk and effectiveness of preventative measures.

ASSESSING AND MANAGING RISK: SUPPLIERS AND SUPPLY CHAIN

4. For our manufacturing activities we acquire raw material and other goods for which we recognise the increased risk of sourcing, particularly in regard to goods imported from outside the UK and EU which are potentially more exposed to these risks.
5. We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks. We aim to continue to improve our knowledge of our operations and supply chain, including by mapping further supply chains.
6. We do and will not support or deal with any business partner which is known to be involved in human trafficking or modern slavery.
7. We operate a supplier procedure within the provisions of the Code of Ethics and maintain a qualified supplier list.
8. We have adopted due diligence procedures in relation to the approval of new suppliers, which includes the analysis of our suppliers' own risk assessment and controls for eliminating human trafficking and modern slavery.
9. We have a supplier approval processes in place to identify risks, *e.g.*, through yearly quality audits where, among the others, we have the chance to personally check the working conditions of employees; we submit self-assessment questionnaire and surveys where, among the others, we request the supplier to demonstrate if they have adopted CSR/Sustainability Reports or Certifications that can evidence they adherence to applicable law and international standards; a reputational screening through an external provider which evaluates the economic reliance of the supplier, the existence of any judgments relating to anticorruption and related issues, the existence of mass media information and articles that may affect the reliability of the supplier is made. To date, IRCA Group is not aware of any instances of concern identified in the last financial year.
10. We enforce a zero-tolerance policy of human trafficking and modern slavery with organisations which are contracted to supply goods to us, including for example:
 - a. We share the IRCA Code of Ethics with suppliers and mention its mandatory compliance in several documents, *e.g.*, supplier questionnaires, purchase agreements, general terms and conditions.

- b. We request and expect that our suppliers accept and respect the international standards related to human rights, such as the ILO convention.
 - c. We have contractual mechanisms in place to unilaterally terminate supplier contracts where there is evidence of breach of any of the principles and obligations undertaken with the Code of Ethics and the other policies.
11. Training on sustainable procurement is mandatory for all employees, from directors to factory workers, to be able to maintain sustainability certifications such as RSPO, Rainforest Alliance and Fairtrade. In 2024, the course was run by 171 people². Those who work directly in procurement, and with the certifications, undergo additional specific training across all business units. We are committed to commence a further programme of training for our procurement teams to embed best practice.
 12. We have processes in place to visit suppliers and factories on an annual basis. The person visiting gives instructions and provide a final report. Our Supplier Quality Managers regularly meet our suppliers in person. We arrange for Quality department to visit our suppliers and factories to improve our working relationship and to ensure that we have visibility of our supply base. We continue to prioritise visits to factories based on higher risk areas and are committed to increasing the transparency within our supply chain.
 13. As a business, we are members of the Supplier Ethical Data Exchange (SEDEX), an organisation which helps to improve supply chain sustainability and manage risks. We undertake an analysis of our ethical performance through the SEDEX Self-Assessment Questionnaire (SAQ) and, for the majority of our production sites, SMETA audits.
 14. To date, IRCA Group is not aware of any instances of human trafficking or modern slavery in our business or our supply chain.

MANAGING RISK: OUR POLICIES

15. We operate a number of internal policies both at company level and at Group level to ensure that we are conducting business in an ethical and transparent manner, particularly with regards to labour standards. These are considered and adopted by the Board of Directors of IRCA Group Luxembourg Midco 4 S.à.r.l., the parent company of IRCA Group. This includes the following, which apply either at IRCA Manufacturing UK Limited level or Group level:
 - a. Code of Ethics
 - b. Human Rights Policy
 - c. Anti-corruption Policy
 - d. Economic Sanctions Policy
 - e. Third Party Due Diligence Policy

² The course is provided to all employees every two years, and new employees take the course in the first year of joining

f. Whistleblowing Procedure

16. All our policies are reviewed regularly by the Group Ethics Committee or the relevant adopting department.
17. Our policies and statements are translated in English, which is the official language of the Group, so that all the stakeholders can access and understand them. Furthermore, some policies and statements are also translated in local languages. The Group is committed to fully translate in all the languages to ensure broad understanding.
18. We direct all employees to our staff handbook and to our intranet which contains the IRCA's Code of Ethics and any policies relevant to their role, including those which seek to address the risk identified in this Statement. All of our policies are made available to our employees and can be accessed via our systems at any time.

MANAGING RISK: REPORTING MECHANISMS AND WHISTLEBLOWING

19. As a business, we believe in empowering our people to voice concerns. We are implementing systems to seek to ensure that this Modern Slavery Statement applies to all persons who act on our behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers, volunteers, interns, business partners and our supply chain.
20. We have implemented a Whistleblowing Platform in order to provide our staff with the opportunity to raise any concerns or issues around the employment relationship and any concerns relating to the working environment even anonymously.
21. We promote the visibility of our whistleblowing policy by publishing it in the Intranet, within the website and regularly circulate via e-mail to all Group employees. Furthermore, a clause referring to the Whistleblowing procedure is contained in the General Terms and Conditions of Sale and Purchase adopted through Group companies and is often included in the contracts with clients and suppliers.
22. Our grievance, disciplinary and whistleblowing policies are designed to ensure that grievance and reporting mechanisms are accessible, effective, and safeguard workers from retaliation.

MANAGING RISK: TRAINING AND AWARENESS

23. We aim to embed training and policies through our workforce to encourage staff to raise concerns about any issue or suspicion of human trafficking or modern slavery in any part of our business or supply chain as soon as they can, as well as implementing anonymous reporting mechanisms for our staff to use.
24. This modern slavery statement will be published on our website in order that all of our stakeholders and any interested party can access this information.

PERFORMANCE MONITORING AND COMMITMENTS

25. We are committed to measuring our progress in addressing modern slavery risk. We believe that a good indicator that the steps that we are taking to mitigate the risk of human trafficking and modern slavery in our business and supply chain are effective would be if: there are no reports from our staff or stakeholders to suggest that human trafficking or modern slavery practices have been identified. So far we are working to define a package of key performance indicators to track and monitor, including the number of supplier audits conducted (including food safety audits) or the number of reports received through our whistleblowing platform and their outcomes.

This is the IRCA's Group' Modern Slavery Statement in respect of the financial year 2025/26. It was approved by the Board of directors on 30 April 2026 and has been signed by a Board Director.

Jennifer Bowen (Director)