

UK Modern Slavery Statement 2024



Introduction from Marta Pilczuk

Managing Director – Kraft Heinz, UK & Ireland

Dear Reader,

Welcome to the Kraft Heinz 2024 UK Modern Slavery Statement.

At Kraft Heinz, our vision is clear: to be the trusted leader in creating food that makes people feel good. And we know this starts with doing business the right way - leading with honesty, integrity, and a deep commitment to respecting human rights. This report outlines the steps we are taking to prevent Modern Slavery in our operations and global value chain.

An ethical, transparent value chain is not just important, it's essential. As you will see, we're working to achieve our strategic goals around Modern Slavery through robust supplier assessments, due diligence, and remediation processes. These are integrated into how we select, contract, and engage with our global network of ingredients, packaging, logistics, and manufacturing partners.

While we have made significant strides, we acknowledge that there is still much work to be done. As we continually evolve and enhance our approach, we invite our stakeholders to join us in our efforts to create meaningful change. By working together, we can create lasting, positive impact for individuals, communities, and the future of our industry.

Marta Pilczuk



Scope

Scope

This Modern Slavery Statement has been prepared by The Kraft Heinz Company in accordance with the UK Modern Slavery Act 2015 for H.J. Heinz Company Limited, H.J. Heinz Foods UK Limited and H.J. Heinz Manufacturing UK Limited (together “Kraft Heinz” or “the company”).

This statement describes the modern slavery risk assessments of the operations and supply chain of Kraft Heinz for the period from 31 December 2023 to 28 December 2024 (the “Reporting Period”), and actions taken by Kraft Heinz to assess, address and mitigate potential risks.

Own Operations

As a large food and beverage company, Kraft Heinz’s operations are predominantly directed towards supplying food and beverage products to consumers, retailers and commercial customers. Kraft Heinz is committed to respecting environmental and social rights across its global operations.

Globally, The Kraft Heinz Company employs approximately 36,000 people across its offices and factories with annual net sales of approximately \$26bn during the Reporting Period.

The following map shows the locations where The Kraft Heinz Company’s employees are based:



Supply Chain

Kraft Heinz defines its supply chain as any business which supplies Kraft Heinz, or its related affiliates, with goods or services for the manufacture of goods by Kraft Heinz.

The Kraft Heinz global supply chain focuses on the sourcing and warehousing of ingredients and packaging required for the manufacturing of its food and beverage products, and procuring other indirect goods and services that are necessary for the day-to-day operation of the business. Kraft Heinz also works with external companies to manufacture products on its behalf, which are sold by Kraft Heinz under its own brands. At the end of the Reporting Period, Kraft Heinz had over 3,000 suppliers globally involved in the manufacturing of its products, including ingredients suppliers, packaging suppliers and external manufacturers, as well as over 16,000 suppliers of ‘indirect’ goods and services.

With a diverse portfolio of iconic and emerging brands, Kraft Heinz aims to engage with its suppliers in a long-term and stable relationship, and therefore seeks to do business with suppliers that share ethics and sustainability practices similar to its own. Kraft Heinz continues to place the utmost value on an ethical and transparent supply chain. All suppliers are required to demonstrate a clear commitment to protecting environmental and social rights.

Kraft Heinz also reserves the right to complete due diligence and audits of its suppliers, through its supplier selection and contracting procedures, in order to ensure compliance with local laws and the requirements and business practices that Kraft Heinz expects its suppliers to follow. Moreover, Kraft Heinz continuously evaluates the suppliers it uses throughout its own operations to ensure its global value chain is operating in an ethical manner; one of the company’s core principles.

Policies

Kraft Heinz has several group-wide policies in place that are relevant to social and environmental rights, business ethics, sustainability and health and safety. Many of Kraft Heinz's efforts to ensure no modern slavery exists within its organisation or supply chain are codified within the below Kraft Heinz policies:

<u>Global Human Rights Policy</u>	<p>Kraft Heinz's commitment to responsible business practices, continuous improvement and respect for human rights is engrained within its Global Human Rights Policy.</p> <p>The policy is guided by internationally-recognised standards, including the <u>United Nations (UN) Guiding Principles on Business and Human Rights</u>, the <u>International Bill of Human Rights</u> and the principles set forth in the <u>International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work</u>.</p> <p>Kraft Heinz's Global Human Rights Policy was renewed and re-launched in 2019 and requires all Kraft Heinz employees and related entities, suppliers and business partners to strictly adhere to these human rights standards.</p>
<u>Supplier Guiding Principles ("SGPs")</u>	<p>In 2021, Kraft Heinz launched updated SGPs which outline the company's requirements, standards and expectations for all its suppliers. This policy covers areas including business ethics, human rights, ethical labour practices, occupational health and safety, supplier diversity, animal welfare and environmental stewardship. Suppliers are required to manage their sub-contractors and supply chains in a manner consistent with the SGPs.</p>
<u>Sustainable Agricultural Practices Manual</u>	<p>In 2021, Kraft Heinz updated its Sustainable Agricultural Practices Manual to provide suppliers with guidance based on the principle of creating a long-term farm management philosophy that is focused on productivity, prosperity and reducing environmental harm, whilst reinforcing responsible labour practices, ethical conduct and occupational health and safety principles.</p>
<u>Global Code of Conduct</u>	<p>All employees, officers and directors are required to abide by the company's Global Code of Conduct which addresses every aspect of the business, including topics such as anti-corruption, anti-competitive behaviour, data protection and human rights. To ensure compliance with the global code's tenets, Kraft Heinz regularly provides training, communications and guidance to its employees around the world.</p>
<u>Speak Up and Investigation Policy</u>	<p>All Kraft Heinz employees have an obligation to speak up via the company's <u>Ethics Helpline</u> if they become aware of conduct by a company employee or business partner that they believe, in good faith, may violate any law, regulation or policy, including the Global Code of Conduct. Kraft Heinz will not tolerate any retaliation against an employee who makes a good faith report of misconduct.</p>

Kraft Heinz continually reviews and develops its policies with input from in-house experts, suppliers and external stakeholders.

Governance of Modern Slavery

Kraft Heinz has developed a framework of governance, at global and local levels, on numerous ESG topics – including human rights and modern slavery.

Kraft Heinz Board of Directors

The Kraft Heinz Company's Board of Directors oversees the global ESG strategy and objectives, including the company's activities, opportunities and related risks concerning human rights. It engages with management at least annually to review all significant policies, processes and commitments. Kraft Heinz believes the Board's responsibility for the consideration and oversight of critical ESG issues enhances the company's sustainability efforts, which are a critical component of its overall enterprise strategy.

Executive Leadership Team

The Executive Leadership Team of the global Kraft Heinz Company ("ELT") consists of functional leads representing each business function of Kraft Heinz and its operational zones: General Counsel, Chief Financial Officer, Chief Communications Officer, Chief People Officer, Chief Procurement Officer and Chief Supply Chain Officer, to name a few. The Executive Leadership Team is led by the CEO, Carlos Abrams-Rivera, and reports to The Kraft Heinz Company's Board of Directors.

The ELT provides oversight and executional leadership of the company's ESG strategy and collaborates with the ESG Steering Group (a group comprised of leaders in various functions around the globe, which has sub-committees on various ESG topics, including responsible sourcing). The ELT is ultimately responsible for managing human rights risks within The Kraft Heinz Company.

ESG Team

Accountable to the Board of Directors, and in partnership with the ELT, the ESG Team directs the design, development, execution and continuous improvement of the company's ESG strategy, goals and initiatives. The ESG Team regularly engages with key stakeholders including consumers, customers, shareholders, employees, NGOs and community leaders, and leads the ESG Steering Group.

UK Statutory Directors

The statutory directors of H.J. Heinz Foods UK Limited and H.J. Heinz Manufacturing UK Limited meet bi-annually to discuss and assess the management of both subsidiaries' enterprise risks (with a specific focus on ESG-related risks) against their business models and long-term strategies. The UK statutory directors are responsible for reviewing and approving this Modern Slavery Statement on behalf of the UK entities.

Global Sustainability Team

A Global Sustainability team oversees the ESG strategy implementation within the company's supply chain, implements the supply chain policies that address forced labour, and oversees the roadmap to identify and address the human rights risks in the company's supply chain. Key buyers and executives are tasked to improve working conditions in the supply chain. The Global Sustainability team verifies alignment and implementation of Kraft Heinz Supplier Guiding Principles, which are a mandatory requirement for all suppliers, through the use of supplier self-declarations, online assessments and desktop reviews. For certain designated high-risk countries, commodities and supplier types, Kraft Heinz also utilizes independent on-site verification, including third-party audits.

Kraft Heinz Employees' Accountability

Each Kraft Heinz employee is expected to conduct business legally and ethically and comply with certain established company policies and standards, including but not limited to the prohibition of forced labour and the employment of anyone under the local legal working age. All such standards are outlined in the [Employee Code of Conduct](#). Failure to meet the company's standards on forced labour or minimum age requirements is a violation of corporate policy and may be against the law. Violators may be subject to disciplinary action, up to and including termination of employment, as well as other potential legal consequences.

Risk Assessment - Method

Kraft Heinz adopts a risk-based approach to ESG due diligence. The company's due diligence efforts include conducting risk assessments internally, and with third-party assistance, to identify potential and/or actual ESG risks – including human rights and health and safety risks – by evaluating geographical, economic and social criteria. This risk assessment influences Kraft Heinz's management programmes and enables their integration into risk management procedures and mitigation practices. It also allows for continuous engagement with relevant stakeholders and fosters tracking of the overall effectiveness of Kraft Heinz's risk management programmes.

Sources

The company's risk assessment is based on both quantitative and qualitative data and was informed by:

- **Internal expertise:** with inputs from functional and geographical experts;
- **External stakeholder engagement:** investors are engaged in human rights and other ESG subject areas through regular meetings, including an annual shareholder meeting. Kraft Heinz also proactively and reactively engages with NGOs, conducts in-person meetings on selected issues and is a member of AIM-Progress (a forum of leading Fast Moving Consumer Goods companies which exists to enable and promote responsible sourcing practices); and
- **Quantitative data:** including information from industry-wide audits conducted by the 'Sedex' platform, country-specific risk data from the World Bank, factory profile data, the Kraft Heinz Ethics & Compliance internal helpline, the Modern Slavery prevalence index, and third-party proprietary data.

Materiality Assessment / Stakeholder Engagement

Kraft Heinz leverages its materiality assessment to shape its sustainability strategy to ensure prioritisation on key topics material to the company. This dynamic assessment facilitates identification and prioritisation of the environmental, social and governance issues that are of greatest concern to stakeholders and which impact the success of the business. Kraft Heinz re-evaluates these results with key stakeholders on an ongoing basis to reflect any changes and to allow for the inclusion of new or emerging issues which impact business operations across dynamic global markets.



Risk Assessment - Outcome

Risk Assessment – Operations

As of this Reporting Period, Kraft Heinz has identified the actual risk of modern slavery in its own operations as **low**.

This finding is based on the following:

- Most Kraft Heinz workers are employed directly by Kraft Heinz and their employment contracts are governed by relevant local laws. Kraft Heinz employs human resources and legal specialists to ensure that contractual employment arrangements for Kraft Heinz are lawful and compliant with the relevant regulatory requirements.
- The company utilises several well-established and legally compliant resources, systems and processes to administer team member payments.
- Kraft Heinz manufacturing team members generally have high union engagement and membership.
- Kraft Heinz workers are free to negotiate collectively and, if required, involve third parties such as unions, in such negotiations.

Kraft Heinz continues to monitor the risk of employee issues in its operations through regular employment engagement surveys and investigation of concerns raised, including through the Human Resources team, line management and/or the 24-hour Ethics & Compliance helpline. Additionally, Kraft Heinz provides regular ethics and compliance training.

Risk Assessment – Supply Chain

Kraft Heinz acknowledges that there is a potential risk of modern slavery instances in the upstream supply chain. In carrying out the supply chain risk assessment, Kraft Heinz uses Sedex's Radar tool (which brings together public domain datasets) to inform the business of such risks. Ingredients and commodities identified in the global food system, which may involve potential risk exposure, include:



Cocoa & Sweeteners



Tomatoes



Beans



Nuts & Seeds



Corn



Edible Oils



Wheat



Fresh Vegetables

Risk Mitigation and Prevention – Own Operations

Kraft Heinz respects human rights across its internal global operations and seeks to prevent and mitigate any risks of human rights breaches (including instances of modern slavery) through various policies and mechanisms.

Global Human Rights Policy

Kraft Heinz's commitment to responsible business practices, continuous improvement and respect for human rights is engrained within its business. This commitment is embedded within the Global Human Rights Policy, which applies to both the company's own operations and its global supply chain. Specific focus is placed on the rights of vulnerable groups, including foreign and migrant workers, women, children, indigenous populations, minorities and people with disabilities.

Kraft Heinz's Global Human Rights Policy requires all Kraft Heinz employees and related entities, suppliers and business partners to strictly adhere to its human rights standards which, in summary:

- Prohibit child and underage employment;
- Prohibit trafficking, forced or involuntary prison labour;
- Prohibit all and any forms of abuse, bribery, harassment and discrimination;
- Recognise and respect the rights of freedom of association and collective bargaining;
- Recognise and respect fair, legal and equitable work timeframes, working conditions (including health and safety) and wages;
- Recognise land rights, natural resources and ensure all workers' rights to clean water and adequate sanitation facilities; and
- Require all labour recruitment and employment procedures to be carried out in a legal and ethical manner.

Employment Practices and Collective Bargaining

Additionally, Kraft Heinz implements robust recruitment and employment practices, including both internal controls and external checks, such as via audits on recruitment agencies.

Kraft Heinz empowers workers through the right to join or form trade unions and to bargain collectively. Kraft Heinz management is committed to having constructive relationships with trade unions and works councils and ensuring that worker representatives are not discriminated against.

Trainings

Employee Code of Conduct Training: The most recent version of the Kraft Heinz Employee Code of Conduct is accessible to all employees globally. Kraft Heinz requires its employees to complete mandatory annual trainings on various topics. The company utilises a modular training programme for the various components of the Employee Code of Conduct, meaning the focus of the trainings is established in accordance with the employee's function within the company.

Kraft Heinz has further enhanced the rigour and extent of training being provided to its employees, specifically for those in roles that are more readily exposed to scenarios where forced labour may arise. This targeted and pro-active practice furthers Kraft Heinz's commitment to protecting the rights of workers worldwide, meaning the company is better poised than ever to identify actual or potential human rights violations in its supply chain. The increased levels of training provided by Kraft Heinz help manage human rights protection in its business.

Supplier Guiding Principles Training: Specific SGPs trainings have been made available to all Kraft Heinz Procurement buyers worldwide as well as other cross-functional teams. These trainings are mandatory for all procurement colleagues to complete.

A link has also been shared with the suppliers, providing them with free access to an online training on the SGPs in order to make sure they understand the mandatory requirements and expected practices.

Risk Mitigation and Prevention – Supply Chain

Kraft Heinz is committed to working with its suppliers to ensure they demonstrate a clear commitment to protecting the rights of their workers, subcontractors and onward supply chains. In addition to the Global Human Rights Policy, which also applies to the Kraft Heinz supplier base, this is achieved through the following policies and mechanisms.



Supplier Guiding Principles

Kraft Heinz's standard purchasing contracts require suppliers to comply with all laws and regulations applicable to the fulfilment of their duties under the contract and to adhere to the principles contained in the SGPs, which can be accessed in more than 20 languages on the [Kraft Heinz website](#).

Kraft Heinz has 9 mandatory requirements regarding human rights and ethical labour practices:

1. **Child labour:** suppliers will not directly, or indirectly through their contractors or subcontractors, use child labour, and must have policies in place that prohibit the use of child labour. Suppliers will comply with the minimum employment age limit defined by applicable law or by ILO Convention 138, whichever is more restrictive;
2. **Responsible recruitment:** suppliers shall uphold professional, ethical, safe, secure and responsible recruitment practices with the intention of preventing unnecessary risk exposure, exploitation or unreasonable financial bonds being imposed on recruits. Kraft Heinz abides by the "The Employer Pays Principle". As such, suppliers must ensure that individual workers and job seekers are not charged for their jobs and that the cost of recruitment should be borne, not by the worker, but by the employer;
3. **Migrant workers:** additional consideration should be given to protect migrant workers against further vulnerabilities towards human rights abuses and exploitation;
4. **Forced or involuntary labour:** Kraft Heinz prohibits the use of all forms of forced, bonded, indentured or compulsory labour, including prison labour, military labour, slave labour or any form of human trafficking;
5. **Work hours, work week and payment of wages:** suppliers must comply with all applicable laws and regulations regarding wages, overtime pay, benefits, leave and maximum working hours;
6. **Non-discrimination:** suppliers shall not discriminate in hiring, contracting or employment practices including, without limitation, compensation, promotion, discipline, termination and retirement;
7. **Freedom of association and collective bargaining:** suppliers shall recognise and respect each worker's freedom of association and rights to engage in collective bargaining;
8. **Land rights:** suppliers must respect the land rights of women, indigenous people and local communities impacted by their operations;
9. **Linguistic considerations:** core documentation for employee rights, employment terms and safety considerations should be available in the host country/region's language.

Risk Mitigation and Prevention – Supply Chain

Third-party Self-assessment Questionnaires

All suppliers are expected to join a third-party platform, in order to fill in a self-assessment questionnaire. This enables Kraft Heinz to identify potential gaps and implement remediation plans. Depending on the risk levels, Kraft Heinz may then decide to conduct further on-site verifications.

Kraft Heinz and Third-party Onsite Audits

Upon request, a supplier must certify its compliance with the SGPs and supporting policies and permit Kraft Heinz and/or its designated agents (including any third parties) to engage in monitoring activities, including on-site audits.

Remediation

In the event Kraft Heinz becomes aware of supplier conduct that is not in accordance with the requirements outlined in the SGPs and supporting policies, Kraft Heinz will take appropriate action to investigate any reported non-compliance and discuss the findings with the supplier.

Where Kraft Heinz determines remediation is required, the supplier will implement a corrective action plan to promptly remedy the non-compliance. Kraft Heinz will monitor this activity, finding ways to engage and support suppliers within its capabilities, including but not limited to, access to the Kraft Heinz network of experts.

In the event of serious or persistent conduct in violation of supplier policies, the conduct of the supplier will be evaluated on a case-by-case basis. Kraft Heinz reserves the right to terminate any agreement or business relationship with a supplier that fails to meet any minimum mandatory requirements.



Complaint Mechanisms

Kraft Heinz is committed to addressing any human rights impacts which the company has potentially caused or to which it has contributed, and expects its suppliers, business partners and other relevant stakeholders to likewise ameliorate. Kraft Heinz provides several ways for employees, suppliers, business partners and other stakeholders to raise concerns or complaints. This includes the reporting of potential misconduct to managers, Human Resource professionals, the Legal Department, the Ethics & Compliance team and the confidential Ethics & Compliance helpline (the “Helpline”).

Complaints Procedure

The Helpline is open to all internal and external stakeholders and members of the public, is maintained by a third-party provider and has multilingual staff available 24 hours a day. Reports can be made via country-specific, toll-free phone numbers, or online. When a complaint is made, it is reviewed by a member of the Ethics & Compliance team, classified and then assigned for investigation to the appropriate investigation team and region. Kraft Heinz has timeline standards and expects investigations to be concluded in 45, 80 or 120 days depending on the severity. When an investigation is concluded, the Ethics & Compliance team then creates a report and informs any relevant stakeholders of the outcome of the investigation and appropriate recommendations. Kraft Heinz then works with those stakeholders to implement any recommendations. The company is committed to safeguarding anonymous reports and it does not tolerate retaliation of any kind.

Internal Communications

Kraft Heinz makes sure that all employees are aware of the Helpline and know how to use it. Visuals are provided in the form of posters and video boards in all offices and factories. These are available in the 14 key Kraft Heinz languages. All computer lock screens are set up to highlight how to access the Helpline and refer to the Kraft Heinz value “We do the right thing”.

The Helpline is part of the Code of Conduct and all Ethics and Compliance policies. White-collar workers are required every year to take a training and show their understanding of the complaint mechanism process. Similar trainings are provided face-to-face to the blue-collar workers in the factories and delivered by Human Resources Business Partners and People and Performance teams in 14 languages.

Cascade to Suppliers

Suppliers are required to provide a confidential mechanism for their workers to communicate any workplace grievances, misconduct, or violations of the SGPs, or legal or ethical concerns. Suppliers are also required to protect workers reporting violations in good faith or cooperating in any investigations against retaliation. In the event Kraft Heinz becomes aware of supplier conduct that is not in accordance with the requirements of the SGPs, Kraft Heinz will take appropriate action to investigate any reported non-compliance and discuss the findings with the supplier.

Suppliers and/or any of the suppliers’ employees, contractors, or agents are also encouraged to report any potential non-compliance with the SGPs or any violation or misconduct to the Helpline.

Grievance Mechanism Dashboard

Kraft Heinz measures the effectiveness of complaints or grievance mechanisms by using a dashboard to monitor and analyse investigation metrics, including the number of complaints, issue types, complaint locations, substantiations and investigation timelines, measured against the company’s own year-over-year performance and industry benchmarks.

Looking Ahead

Kraft Heinz has implemented programmes and processes to continue to identify and reduce the risk of modern slavery, both for our own operations and through the value chain.

We will continue to utilize the risk assessment framework designed to prioritise our interventions and focus on higher risk areas within our value chain. This includes following OECD guidelines of ensuring our impact reaches the most affected stakeholders, whether that be obtaining certifications on specific ingredients, engaging with workers directly or partnering with industry stakeholders to drive collective action.

We are in a process of continuous improvement, and the company will continue to update its policies and procedures applicable to its operations and supply chain as Kraft Heinz, its brands, and supply chain, evolves.

We ensure our approach to modern slavery is in line with existing and proposed regulations, including the EU's Corporate Sustainability Due Diligence Directive, and we will continue to take steps to prepare in anticipation of this regulation.

In 2025, Kraft Heinz will continue to increase efforts to supply chain transparency and traceability. Our priority in 2025 will be to conduct human rights risk assessments on our value chain, ensuring compliance to our Supplier Guiding Principles through the Sedex assessment methodology. We will continue to expand our audit programme of our own manufacturing sites, and within our value chain ensure high-risk sites are linked with Kraft Heinz on the platform, and mapped to close any audit or remediation gaps throughout 2025 for 2026 reporting. This programme will soon extend to indirect business partners in line with developments of new technology to support these assessments.

Kraft Heinz will continue to leverage internal teams' support to monitor working conditions at farm level and flag any non-compliances of our Supplier Guiding Principles. We will also partner with the Sustainable Agriculture Initiative (SAI) and leverage Farm Sustainability Assessments (FSA) for tomatoes, to monitor compliance. Kraft Heinz will continue to collaborate with peer brands to improve auditing tools and methodologies, focusing on critical modern slavery risks faced across the consumer goods industry. Where identified, Kraft Heinz will leverage AIM Progress collaboration with peer brands to address issues at shared factories, seek for industry-wide solutions and possible engagements with NGOs and/ or government bodies. These activities on due-diligence and remediation will be supported by

a strategic capability building programme, working both with colleagues internally and externally with supplier partners on modern slavery risks.

Kraft Heinz is dedicated to doing the right thing, leading with ethics and integrity. Kraft Heinz will always strive to do right by its customers, partners, suppliers and the communities it serves. Kraft Heinz actively cares about social responsibility and its environment, and seeks to create high-quality, responsibly manufactured products.

The company's Modern Slavery statements from previous years can be found below:

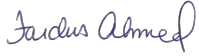
- [Modern Slavery Statement 2023](#)
- [Modern Slavery Statement 2022](#)
- [Modern Slavery Statement 2021](#)
- [Modern Slavery Statement 2020](#)

Approved and signed by:




.....
Title: Director – Financial Controller, European Pacific Developed Markets
H.J. Heinz Foods UK Limited

Date: 23/06/2025



.....
Title: Director – Financial Controller, European Pacific Developed Markets
H.J. Heinz Manufacturing UK Limited

Date: 23/06/2025



Humbert Cheung (Jun 24, 2025 16:53 GMT+1)

.....
Title: Director – Financial Controller, International Headquarters
H.J. Heinz Company Limited

Date: 24/06/2025