

## Modern Slavery Act Statement - January 2025

### **Our Business**

As a leading manufacturer and distributor of fertilisers to Agriculture and Amenity sectors throughout Great Britain, we produce a comprehensive range of NPK, prescription blends, straights and micro-nutrient products. In addition to commodity Fertilisers, the company is committed to developing innovative and technologically enhanced crop nutrition products and services with the objective of improving crop yields, crop quality and farmer returns. Origin Soil Nutrition and PB Kent are trading names of Origin UK Operations Limited.

### **Our Ethical Standards**

Origin UK Operations Limited (trading as Origin Soil Nutrition and PB Kent) is committed to conducting itself with the highest ethical and legal standards, ensuring that the operations within the business and its supply chain meet those standards at all times.

Origin is committed to ensuring that it is compliant with the Modern Slavery Act 2015 (“MSA”) and will not accept non-compliance with the MSA within its own operations or those of partners or suppliers. We are aware that human traffickers and illegal/unlicensed gang-masters target a range of industries including those involved in the agricultural sector. It remains important that we maintain our vigilance and continually improve our controls and procedures.

### **Continuous Improvement**

We recognise that risk assessment, management oversight and continuous improvement are important, and we closely monitor UK government guidance, updates and requirements - and seeking advisor input as appropriate. Origin continues to review and improve upon its actions and due diligence measures, including but not limited to the following:

- Improving upon our internal ‘labour supplier/agency risk checks’ to ensure that any permanent or seasonal employees (within our circa 230 workforce, based at various sites in the UK, including our production facilities) are sourced in compliance with UK law and in a way that helps minimise Modern Slavery risk. This is done with the understanding that human traffickers and gang masters operate in the UK, disguising themselves as labour providers / labour agencies. With effect from January 2025 there will be increased vetting of any labour agencies used for temporary labour by both the Finance and HR team.
- Enhancement of our internal systems and processes to track and monitor supplier compliance with our Modern Slavery Act principles, through a newly implemented IT system. This will enable swifter reporting by recording the date of acceptance by the supplier that it will adhere to our MSA principles, which appear in Origin’s supplier welcome pack and onboarding process.

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### Other Existing Procedures

As well as the above measures, we will also continue to take the following steps to ensure that we further combat slavery and human trafficking:

- Continue to monitor and review our MSA processes, ensuring that we are also keeping up to date with proposed government amendments to legislation, including sourcing external legal advice where appropriate to do so.
- Operation of MSA Steering group comprised of Senior HR, Senior Operations Leader and a Senior Finance representative to discuss, implement and develop MSA controls and procedures and review progress.
- Commit to promptly answer questions posed by our customers in respect of the MSA who wish to know more about our operations and / or our supply chain.
- Provide an opportunity for all employees to identify risks anonymously through a whistleblowing process, which is detailed on the company intranet, notice boards and communicated in our modern slavery policy.
- Communicating to all employees our Conduct Charter, which is complementary to our existing Code of Conduct for employees and recurrent training and guidance to help identify and report human rights abuses/slavery. Collectively these policies and guides reiterate our commitments to our own people, the communities in which we work and to the environment as well as making clear our commitment to human rights abuses/slavery prevention.
- Requiring Origin suppliers to acknowledge, accept and adhere to the Supplier Code of Conduct, which covers a number of areas consistent with the general context of the Modern Slavery Act 2015, but with specific focus on: people & labour; business ethics & compliance; and health, safety and the environment.
- Annual communication to all employees reiterating the need for vigilance with respect to modern slavery, alongside sharing links to current guidance and policy. Reminders and links to eLearning training (to be completed by all new starters and every two years for existing employees) are also shared as part of the annual communication.

### Our Supply Chain

We are a manufacturer and distributor and our supply chain is global in its reach. We source from manufacturers directly or through intermediaries many of whom are large multinational organisations. However, we remain vigilant to all risks, particularly in small-scale suppliers, in whose sector there may sometimes be a higher risk of unlicensed, seasonal manual labour.

Origin UK Operations Limited is committed to ensuring our supply chain is free from human rights abuses and modern slavery. We actively welcome comments and suggestions from anyone within our

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supply chain about how we can improve our operations or further reduce risks in our supply chain. If you have any questions regarding this matter, please contact us by emailing us on: [MSA@originukoperations.co.uk](mailto:MSA@originukoperations.co.uk).

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