



GAIL's

Modern Slavery Statement

This statement is made pursuant to s4 of the Modern Slavery Act 2015 (the "Act") and sets out the steps that Bread Holdings Limited (BHL) and its relevant UK subsidiaries and group companies have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

The relevant UK subsidiaries are The Bread Factory (TBF) and GAIL's Bakery.

Modern slavery encompasses slavery, servitude, human trafficking, and forced labour. Bread Holdings Ltd is committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or supply chain.

This statement relates to actions and activities during the financial year 1st March 2023 – 29th February 2024.

OUR BUSINESS

Bread Holdings Limited is a manufacturer and retailer in the food industry. Our registered office is Unit 12 Garrick Road Industrial Estate, Irving Way, London NW9 6AQ. At this address, TBF produces and bakes bread, cakes, and pastries for wholesale customers. We have 979 employees based at our sites in Hendon, Manchester, Milton Keynes, St Albans and Bath.

GAIL's Bakery has 129 sites across London, Oxford, Brighton, and Manchester. We are currently expanding our presence across the UK.

As such, BHL has an extensive supply chain, and we procure goods and services in excess of £45 million per year. We work with a wide range of different suppliers, subcontractors, and partners each of which will have their own subcontractors, affiliates, and associate entities. Bread Holdings Limited therefore is connected to multiple entities across Europe (though mainly the UK) through numerous contractual relationships.

OUR POLICIES

At GAIL's bakery, we operate several internal policies to ensure that we conduct business in an ethical and transparent manner. These policies are available to our teams via our online E-learning platform and include:

- Whistleblowing policy
- Recruitment and selection policy
- Equality policy
- Anti-Slavery and human trafficking policy
- Anti-Bribery and Corruption

At TBF, we rolled out the following policies to our teams:

- Anti-Bribery and Corruption
- Recruitment & Selection policy
- Whistleblowing
- Equal Opportunities & Dignity at Work
- Ethical Trading Code of Practice

We continuously review our policies and procedures and are undertaking a project currently to align them company-wide.

Across BHL we have controls in place to ensure that all employees are assessed for their right to work and that our wages and benefits comply with the relevant government legislation.

OUR SUPPLIERS

TBF operates a supplier policy and maintains a preferred supplier list. We are working towards understanding our supply chain and developing the appropriate policies.

This will include ensuring that a supplier has not been convicted of an offense relating to modern slavery, is taking steps to comply with the Modern Slavery Act 2015, and holds their own suppliers to account over modern slavery.

TRAINING AND AWARENESS

Re-trained our management team to recognize the signs of modern slavery.

Ensured that during every employee induction session, we cover how to identify the indicators of modern slavery and what to do if any of these indicators are suspected.



GAIL's

Our supplier self-assessment questionnaire includes a section on Modern Day Slavery

Our focus for the next year will be to ensure:

All key members of the People and Talent Team attend a Stronger Together Workshop (either as a refresher or initial training).

We are currently reviewing our supplier standards including a focus on preventing modern slavery.

Our internal noticeboards across the Hendon site are being updated with support information to raise awareness among our employees.

Supporting Anti-Slavery Day on 18th October by communicating this with our management team and employees.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified. However, where they are reported we will engage with the appropriate agencies to ensure the matter is investigated.

Our suppliers and partners themselves clearly state their own adherence to the standards that we at BHL have outlined here

This statement is a combined statement for BHL and its UK subsidiary companies and was approved by the Board of BHL.

Marta Pogroszewska

Chief Operations Officer

Bread Holdings

V2 January 2024