



MODERN SLAVERY STATEMENT

Organisation

This statement applies to all companies within and associated with Top Farms Group Ltd that are covered by, or operate under the governance of, the Group (referred to in this statement as “the Group”). It relates to the financial year ending December 2025 and sets out the steps taken during that year to prevent modern slavery and human trafficking in the Group’s own operations and supply chains.

Organisational structure

Top Farms Group Ltd is a leading integrated food and agricultural group with businesses based in the UK and Central Europe (Poland and Romania). The Group utilises an extensive network of partner growers for its main activity of primary production of crops.

The Head Office for The Group is based in the UK. The Group is owned by Accession Capital Partners GmbH (“ACP”) with an employed Chief Executive Officer (“CEO”) who oversees the business; each country has its own Managing Director and Senior Management team.

The labour supplied to The Group in pursuance of its operation is carried out in each own country. Each country may use foreign labour in accordance with the law and policies within each country.

Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required under relevant employment, immigration, health and safety, and labour legislation in each jurisdiction in which it operates, including the UK, Poland and Romania, and in many cases exceeds those minimum standards in relation to its employees.

Supply chains

To fulfil its activities, the Group's main supply chains include seed, fertiliser, crop protection products, packaging, transport, machinery, equipment, labour providers, professional services and food-related goods and services across the United Kingdom and Europe. The Group recognises that some first-tier suppliers may be intermediary traders or service providers and may have further contractual relationships with lower-tier suppliers. The Group therefore takes a risk-based approach to mapping and reviewing its supply chains, with particular focus on labour provision, seasonal work, agency labour, migrant labour, transport and outsourced services.

Potential exposure

The Group considers its main exposure to the risk of slavery and human trafficking to exist within the use of seasonal workers and agency workers.

The Group considers its potential exposure to slavery and human trafficking to be relatively high because of the seasonal nature of agricultural work, reliance on agency labour at peak periods, the use of migrant workers and the complexity of some supply chains. The Group has taken and continues to take steps to reduce this risk in its own business and in organisations that supply goods and/or services to it.

Steps

The Group carries out due diligence processes to help ensure that slavery and/or human trafficking does not take place in its organisation or supply chains. These processes include reviewing labour providers, requiring appropriate registrations and licences where applicable, carrying out supplier checks, assessing higher-risk areas, reviewing contractual terms and engaging with workers, managers, labour providers and customers through audits, meetings and worker interviews.

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, The Group has taken the following steps to ensure that modern slavery is not taking place:

- Reviewed supplier contracts to include termination powers where a supplier is, or is reasonably suspected to be, involved in modern slavery or human trafficking
- Required labour providers supplying UK companies to hold and maintain GLAA registration where legally required
- Undertaken risk-based audits of labour providers, including checks on right-to-work processes, worker documentation, accommodation arrangements where relevant, wage arrangements and worker welfare
- Engaged with customer audits and third-party ethical compliance reviews to test the effectiveness of Group controls
- Maintained accessible reporting routes, including management reporting lines and the Group's Whistleblowing Policy
- Embedded and communicated a zero-tolerance approach to modern slavery, forced labour, servitude and human trafficking

During the financial year ending December 2025, the Group is not aware of any confirmed cases of modern slavery or human trafficking within its own operations or supply chains. Any concerns identified through audits, worker engagement, supplier reviews or whistleblowing routes will be investigated and addressed in line with Group policies and relevant legal obligations.

Key performance indicators

The Group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Group or its supply chains.

- Completion of annual or risk-based audits of labour providers supplying the Group
- Regular meetings and interviews with agency workers, seasonal workers and managers to identify welfare or labour exploitation risks
- Monitoring of training completion for managers, supervisors and key personnel in higher-risk areas
- Recording and review of any modern slavery, worker welfare or labour provider concerns raised during the year and the actions taken in response
- Ongoing review of supplier due diligence records, contractual controls and corrective actions arising from audits or supplier engagement

For the next financial year, the Group intends to continue improving its approach by further strengthening supply chain mapping, enhancing the recording of labour provider checks and audit outcomes, reviewing the effectiveness of modern slavery training, and continuing to promote worker awareness of reporting routes in relevant languages.

Policies

The Group has the following policies which further define its stance on modern slavery:

- Ethical Policy – This demonstrates the group commitment to high standards of professionalism and integrity, sets behavioural expectations of honesty, fairness and respectfulness and forbids taking advantage of others through dishonest, unethical or illegal practices
- Whistleblowing Policy – The Group is committed to a culture of openness in which anyone can report legitimate concerns of malpractices or misconduct. The policy applies to employees, contractors, suppliers and customers of the Group
- Modern Slavery Act Policy – This highlights the specific policy guidance and assessment steps for determining supplier compliance with the principles of the Modern Slavery Act.
- All Group staff are made aware of this statement, which is held on the intranet and published on the Group's website. The Group will ensure that the website version is accessible through a prominent link and will consider submission to the UK Government's modern slavery statement registry where appropriate.

Training

The Group provides the following training to staff to effectively implement its stance on modern slavery:

- Induction Training
- Stronger2Gether Training for managers and key personnel
- Regular awareness days
- Posters and literature in foreign languages displayed for all workers

Slavery Compliance Officer

The Group has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action regarding The Group's obligations.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015. It has been approved by the Board of Top Farms Group Ltd and will be reviewed for each financial year.

Approved by the Board on: 01 January 2026

Tomasz Zdziebkowski
Group Chief Executive
Top Farms Group Ltd