

## Modern Slavery Act Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by NWF Group plc and its subsidiaries during the 2023-24 financial year, which ended on the 31<sup>st</sup> May 2024.

We acknowledge the responsibility we have to guard against modern slavery and human trafficking and are committed to the prevention of it in our businesses and supply chains.

### Our Business

NWF Group plc is a specialist distributor across the UK connecting essential suppliers with their customers. With a heritage in the agricultural sector, the Group has over 150 years' experience in adding value to our customers.

The Group is made up of three trading divisions:

- NWF Fuels (Fuels) is a leading distributor of fuel oil and fuel cards, delivering over 659 million litres of fuel across the UK to 107,000 customers through a network of 27 depots. Fuels has over 300 employees.
- Boughey Distribution (Food) is a leading consolidator of ambient grocery products with over 1,400,000ft<sup>2</sup> of warehousing and significant distribution assets. Food has over 800 employees.
- NWF Agriculture (Feeds) is a leading national supplier of ruminant animal feed, feeding one in six dairy cows in Britain. The business supplies over 4,400 farmers from Scotland to Cornwall and has over 250 employees.

### Risk Assessment

Each of the divisions is responsible for undertaking due diligence to identify where they feel modern slavery and human trafficking could most likely occur in their business. By identifying the high risk areas we can then focus our efforts.

We have identified our two principle risks to be the following:

1. The supply chain in Feeds; and
2. Use of agency workers, primarily in Food.

### Policies

Our policies are regularly reviewed and we believe that our present arrangements offer sufficient protection to all workers.

In addition to policies that protect all workers from mistreatment, we have a robust and effective Whistleblowing Policy (available from [www.nwf.co.uk](http://www.nwf.co.uk)). All workers, including agency workers, are encouraged to report suspected wrongdoing, including modern slavery and/or human trafficking concerns, under the Policy.

We operate strictly in accordance with UK employment legislation.

### Due Diligence

Following the creation of a new supplier due diligence process in 2021-22, all existing suppliers were provided with the Group's new Supplier Code of Conduct during 2022-23. The Supplier Code of Conduct formally establishes the minimum standards that must be met by any entity that supplies products or services to the Group. Following the roll-out of the Supplier Code of Conduct, the Group conducted a risk assessment (as detailed above) and those suppliers that were perceived as having the greatest risk of supply chain modern slavery were asked to complete a tailored and comprehensive Supplier Due Diligence Questionnaire.

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### Effectiveness

We continue to operate in accordance with our modern slavery principles and believe that we have a low risk of modern slavery and human trafficking in our businesses and supply chains. However, we understand that combatting modern slavery and human trafficking is an ongoing process and we endeavour to reduce the risk of this being present in our supply chain and businesses year on year. During 2024-25, our businesses will receive training to ensure the risk of modern slavery and human trafficking remains low and to encourage employee vigilance. The process of analysing the completed Supplier Due Diligence Questionnaires will be completed and a framework for ongoing supplier due diligence will be embedded.

No instances of modern slavery or human trafficking were identified or reported in 2023-24.

This statement was approved by the Board of NWF Group plc on 7 November 2024.

A handwritten signature in black ink, appearing to read 'CBelsham', written over a horizontal line.

Signed on behalf of the Board by Chris Belsham, Chief Executive, NWF Group plc.