

Introduction

Slavery and Human Trafficking are growing and often hidden issues in our global society with growing inequality and widespread labour shortages. James Hall and Company Ltd takes its responsibility in minimising these global issues very seriously and we have a commitment to prevent modern slavery, protect human rights and ensure people are treated fairly.

Our approach to modern slavery issues is to employ a zero-tolerance approach within the course of our businesses, including internal processes, the processes of those who we contract with and ultimately those within the wider supply chain. We are committed to continuously reviewing, updating and improving our practices as we understand the importance of modern slavery being a global problem that impacts our business.

Our ethos at James Hall and Company Ltd is very clear and we make a commitment to treat all customers, suppliers and employees with respect.

Group Overview

James Hall and Company Ltd is a Lancashire-based family business which was founded in Southport in 1863.

We are primarily a wholesaler and distributor for SPAR, serving approximately 600 stores in the North of England. Currently, we are one of the county's largest employers, with more than 1,000 staff at our head office, as well as those employed across our four food manufacturing sites and 160 retail stores.

We also use agency labour for short term staff shortages, which are sourced through reputable recruitment agencies.

James Hall and Company Ltd sets high standards for responsible retailing and service.

Our Divisions

Our principal function is the wholesale and distribution of food and drink. However, our other divisions involve the manufacture of food products, wholesale of non-food items and retail division.

Our group of companies include the following trading entities:

- James Hall and Company Limited (our Wholesale and Retail Divisions);
- James Hall and Company (Properties) Limited;
- James Hall and Company (Holdings) Limited;
- Clayton Park Bakery Limited;
- The Great Northern Sandwich Company Limited;
- Fazila Foods Limited;
- Graham Eyes High Class Butchers Limited;
- G&E Murgatroyd Limited;
- North East Convenience Stores Limited;

- G&E Murgatroyd North East Convenience Stores Limited;
- G.A.P. Convenience Distribution Limited; and
- Alston Dairy Limited.

Our Supply Chains

Our trusted supply chains include the sourcing of materials, predominantly, but not exclusively relating to food and drink. We monitor our direct supply chain to find the right partnerships to do business with and have concluded that the risks of modern slavery and human trafficking are low.

We acknowledge that we must remain vigilant to the risks and ensure that our suppliers understand and play their part in ensuring that modern slavery and human trafficking does not take place in our supply chains. We continue to make progress in supply chain compliance management and intend to carry out reviews of the supply chain to ensure that suppliers are following the guidance and that they continue to have policies in place that mirror our ethos.

Our Policies

Our family ethos underpins the company's outlook in respect of modern slavery and our commitment to complying with ethical practices and safeguarding individuals within our business and supply chain. We expect our values and zero tolerance approach to be maintained throughout our supply chains to ensure that slavery and human trafficking is not taking place at any level.

Our modern slavery statement is available to staff and provided to contractors and suppliers as part of our due diligence, annual updates and training.

We intend to continue to review the steps we take when engaging with new suppliers, contractors and business partners. This is to ensure that they are aware of and will adhere to our supplier conditions and warranties, as well as to protect and enhance the wellbeing of the colleagues we employ, both directly and indirectly.

Due Diligence/Risk Assessment

To mitigate the risks, we adopt a risk-based approach to implement a system of checks and controls to identify any risk areas and how these are mitigated.

A priority of ours is for all new suppliers to sign our supplier warranty which sets out our expectations in respect of modern slavery issues. Our internal processes require new suppliers to be approved by our Quality Department before being signed off by a Director.

We also continually review our supplier warranty and existing policies and if required, we will make amendments to recognise our obligations under the Act to ensure compliance.

We review the responses from our suppliers to judge future actions and assess what further due diligence or other steps are required and continue to explore modern slavery due diligence.

In relation to food products, where possible we deal with food safety accredited suppliers. However additional due diligence is exercised if a supplier does not hold a recognised food safety accreditation and particularly in the manufacture of food products. This will include site visits where appropriate.

We aim to establish long-term business relationships with local suppliers so that they are aware of our values and expectations, and we have a working knowledge of their processes and compliance.

When dealing with large national/multi-national companies, we expect the same commitment to anti-slavery practices including a satisfactory modern slavery statement and supply chain due diligence.

We are in the process of reviewing and investigating a new process for onboarding and checking compliance from suppliers. James Hall and Company Ltd have become members of SEDEX, which is used for supply chain assessment, to store, analyse, share, and report on sustainability practices. We are currently checking our existing supplier database to establish whether any of our suppliers are registered. The sharing of data on the SEDEX platform should increase the efficiencies and monitoring of suppliers going forward.

Training

To minimise the risks of slavery and human trafficking at James Hall and Company Ltd and our supply chains, we aim to give training, where necessary to all relevant members of staff.

James Hall and Company Ltd's training is reviewed on an annual basis and updated where necessary, as we see training as playing a major role in Modern Slavery awareness.

Measuring Effectiveness

Over the coming years and beyond, we will continue to work with our employees and suppliers to develop our training on the topic of modern slavery and continue to strengthen James Hall and Company's Ltd due diligence, process both internally and with our suppliers. Our strategy will be to focus on changing risks and be as responsive as possible to any new risks, to make sure we address any concerns.

In order to monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, we will use the following performance indicators for the financial year ahead:

- We will continue to review, invest and communicate our policies to our workforce setting out our stance in relation to modern slavery, especially in the key areas of our business to ensure knowledge of the current policies and standards;
- As members of SEDEX, we will continue to utilise the SEDEX platform to establish a better oversight of our direct supply chain, to aid risk assessment to provide better due diligence. Any concerns will be raised with the suppliers in relation to modern slavery issues;
- Due to the diversity of our business, where the suppliers are not members of SEDEX, we will continue to establish policies and procedures to give a better oversight of our direct supply chain, to aid risk assessment to provide better due diligence. Any concerns will be raised with the suppliers in relation to modern slavery issues;
- We will continue to review and revise our anti-slavery and human trafficking clauses in our contracts with our suppliers.

As we develop our risk assessment and due diligence processes, we will assess and consider the appropriateness of developing further measures, where we assess that there may be a heightened

risk of slavery and trafficking within those organisations. Modern slavery is an expanding topic and as we cannot do this as a standalone company, we will continue to work with our industry counterparts to tackle our shared challenges going forward.

This statement is made pursuant to s.54 (1) of the Modern Slavery Act 2015 and constitutes the James Hall Group of Companies' Modern Slavery and Human Trafficking statement for 2024-2025.

This statement has been approved on behalf of the James Hall Group of Companies on 28th August 2025.

Statement Approved by Nicola Blow, Company Secretary.