

Modern Slavery and Human Trafficking Statement

Nualtra Limited

Financial Year: 1st April 2025 to 31st March 2026

1. Introduction

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and sets out the steps that Nualtra Limited has taken during the financial year to prevent modern slavery and human trafficking in our business operations and supply chains.

Nualtra Limited is committed to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to ensure modern slavery does not occur within our operations or supply chains.

Nualtra Limited is part of the Ajinomoto Group. The Ajinomoto Group has established principles that illustrate the beliefs and behaviours which companies in the Group and each of us who work there should uphold, naming them the Ajinomoto Group Policies (AGP). The AGP apply to all of our activities and provide a written commitment to all of our stakeholders that we uphold them. Included in the AGP is our approach to Human Rights.

2. Our Business and Supply Chains

Nualtra Limited is engaged in the development, supply and distribution of essential nutrition. Our operations are primarily based in the UK and the Republic of Ireland, with supply chains including manufacturers, distributors, logistics providers and professional service suppliers located both in the UK and internationally.

Our supply chains may involve third-party suppliers operating in jurisdictions where the risk of modern slavery can be higher. We recognise our responsibility to identify and mitigate these risks.

3. Policies and Governance

Nualtra Limited has adopted policies and procedures that support our commitment to preventing modern slavery, including:

- A **Human Rights Policy**
- A **Code of Conduct** outlining ethical standards expected of employees and suppliers
- A **Supplier Code of Conduct**, requiring suppliers to comply with applicable labour laws and human rights standards

These policies are reviewed periodically and communicated to relevant employees and business partners.

UK Office: Basepoint Business Centre | Oakfield Close | Tewkesbury | GL20 8SD

Republic of Ireland Office: Roselawn Suite 1 | Roselawn House | National Technology Park | Limerick | V94 6R68

Germany Office: Marie-Curie-Str | 19, 79211 Denzlingen | Germany

Cyprus Office: 195 Lemesos Avenue | 2540 Dali | Nicosia | Cyprus

4. Risk Assessment and Due Diligence

We take a risk-based approach to assessing modern slavery risks within our operations and supply chains. This includes:

- Evaluating supplier locations, industry sectors and labour practices
- Conducting supplier due diligence during onboarding and renewal processes
- Requesting assurances from suppliers regarding compliance with modern slavery legislation

Where potential risks are identified, we work with suppliers to improve standards or, where necessary, reconsider the business relationship.

5. Actions Taken to Address Risks

During the reporting period, Nualtra Limited has taken steps including:

- Engaging with key suppliers to confirm their compliance with anti-slavery requirements
- Reviewing procurement practices to promote ethical sourcing

We are committed to continuous improvement and will enhance our controls as our business and supply chains evolve.

6. Training and Awareness

We provide appropriate training and guidance to employees involved in procurement, supply chain management and senior leadership to help them:

- Understand the risks of modern slavery
- Recognise potential indicators of exploitation
- Know how to raise concerns

7. Measuring Effectiveness

We monitor the effectiveness of our approach through:

- Periodic reviews of supplier compliance
- Internal assessments of procurement and governance processes
- Review of any reported concerns or incidents related to labour practices

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8. Future Commitments

Nualtra Limited is committed to strengthening its approach to tackling modern slavery and will:

- Continue to review and enhance supplier due diligence
- Expand training and awareness activities
- Regularly review and update this statement

9. Approval

This statement was approved by the Board of Directors of Nualtra Limited and is signed by a Director in accordance with the requirements of the Modern Slavery Act 2015.

Signed:  _____

Name:

Title: Chief Executive Officer & Company Director

Date: 6th May 2026

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