A company of SOUFFLET MALT

Soufflet Bairds Malt Limited

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and constitutes Soufflet Bairds Malt Limited's ("Bairds Malt") slavery and human trafficking statement. The entities covered by this statement are Soutfflet Bairds Malt Limited and its wholly owned subsidiaries including SBM Scotgrain Limited and Scotgrain Agriculture limited. This statement covers the period from 1 July 2024 to 30 June 2025.

Introduction and Commitment

Bairds Malt is committed to preventing acts of modern slavery and human trafficking in our business and supply chains. We have a zero-tolerance approach to any form of forced labour, child labour, human trafficking, servitude, or exploitation. As part of the InVivo Group and the Soufflet Malt S.A.S Group, we align with Soufflet Malt's Code of Conduct, which requires compliance with all applicable domestic and international laws, including those protecting human rights and employment standards, and promotes ethical relationships with partners and suppliers. We expect our suppliers, contractors, and business partners to uphold equivalent standards. This statement outlines the steps we have taken during the reporting period to identify, assess, and mitigate risks of modern slavery.

Organisational Structure, Business Activities, and Supply Chains

Bairds Malt is a UK-based malting company and a subsidiary of Soufflet Malt S.A.S. (part of the InVivo Group based in France), with a malting capacity of approximately 380,000 tonnes. We operate in the UK as *Soufflet Bairds Malt Limited* (company number 09382146), and its subsidiaries including *SBM Scotgrain Limited* and *Scotgrain Agriculture limited*. We employ approximately 190 permanent staff, all based in the United Kingdom. Our UK headquarters is at Shobnall Maltings, Wellington Road, Burton-upon-Trent, DE14 2AP. Our operations include four malting plants (Inverness, Arbroath, Burton-on-Trent, and Witham) and a grain store in Turriff. Our scope of activities encompasses:

- Drying and storage of barley;
- Manufacture of malts and roasted products for the brewing, distilling, and food industries;
- Supply of animal feed co-products;
- Supply of malt and other ingredients to the craft and micro brewing industries;

- Supply of agricultural supplies, including fertiliser, chemicals and seed, to arable farming;
- Supply of wheat, oats and other grains to animal feed, food and whiskey producers.

All barley for malting as well as any other grains are sourced within the UK from growers, farmer cooperatives, or grain merchants. We maintain long-term relationships with suppliers to ensure quality and traceability. Key procurement categories include:

- Commodities/grains (primarily UK barley and wheat);
- Packaging materials;
- Logistics/transport;
- Labour hire (limited);
- Goods for resale (GFR) such as fertilisers, chemicals and seed;
- Goods and services not for resale (GNFR), such as energy, utilities, and maintenance.

We use third-party storehouses for grain storage and specialist malt bagging. Distribution involves bulk and packaged formats to customers in brewing, distilling, and food sectors.

Policies Related to Modern Slavery

Bairds Malt operates under Soufflet Malt's Code of Conduct, which commits to respecting human rights, complying with employment laws and international standards, and ensuring ethical supplier practices (including fair selection and investigation of concerns about employment conditions). We maintain internal policies on ethical conduct, anti-bribery, and whistleblowing (aligned with InVivo mechanisms). Suppliers and partners are required to complete our Compliance Information Declaration Form, which includes confirmations on modern slavery prevention, no convictions/investigations, due diligence in their chains, and notification obligations. We expect all partners to:

- Comply with modern slavery laws;
- Implement appropriate due diligence;
- Prohibit forced/child labour and exploitation.

Due Diligence Processes

Bairds Malt applies a risk-based approach to supplier due diligence. All new suppliers are subject to screening prior to onboarding. This includes completion of our Compliance Information Declaration Form, which covers corporate ownership, directors, beneficial ownership, anti-bribery compliance, and modern slavery commitments. Supporting

documentation (e.g. incorporation certificates and relevant trade licences) is reviewed as part of this process.

Existing suppliers engaged prior to implementation of the current onboarding process are, as determined required, subject to periodic review based on risk profile, performance history, and sector exposure. Where material changes occur (e.g. change of ownership, service scope, or geography), enhanced review may be undertaken.

Screening is conducted at onboarding and is supported by ongoing supplier monitoring, as deemed required, through contractual compliance clauses, periodic engagement, and operational performance review.

As at the date of this statement, Bairds Malt has not identified any suppliers assessed as high risk for modern slavery or human trafficking concerns.

Risk Assessment and Identified Risks

Our principal operations and supply chains are low-risk due to:

- Predominantly UK sourcing in regulated, mechanised agriculture;
- Direct/long-term relationships with established growers/merchants;
- Limited procurement of products, such as packaging and clothing, from high risk jurisdictions;
- Limited use of temporary/seasonal labour or high-risk geographies.

Potential residual risks include logistics/transport, packaging, or third-party services (e.g., labour hire or warehousing). We mitigate these through supplier declarations, contract clauses, and awareness of sector guidance. No modern slavery incidents, concerns, or reports were reported in our operations or supply chains during the period.

Training and Awareness

Bairds Malt provides structured modern slavery awareness training to relevant personnel, including procurement, operations, and senior management staff. Training is delivered at induction for relevant roles and refreshed periodically to ensure continued awareness of risks, red flags, and reporting channels.

The training programme covers:

- Understanding modern slavery and human trafficking risks
- Recognising indicators within supply chains and service providers
- Internal escalation procedures
- Use of whistleblowing mechanisms

- Expectations under the Soufflet Malt Code of Conduct

Modern slavery awareness forms part of our broader governance and compliance culture and is reinforced through internal communications and leadership engagement.

Monitoring Effectiveness and KPIs

Bairds Malt monitors the effectiveness of its governance and risk management systems through a combination of operational, quality, and compliance metrics. While modern slavery risk within our UK-focused operations is assessed as low, we recognise that strong management systems reduce broader organisational risk and strengthen ethical supply chain oversight.

Key indicators monitored during the reporting period include:

- Maintenance and continuous reduction of workplace accident rates;
- Less than 1% of total malt supplied resulting in customer complaints;
- Continual improvement in adherence to specification of off-kiln malt batches;
- Reduction in non-conformances related to quality management systems;
- Zero food safety incidents;
- Active involvement of executive-level staff in supplier approval, oversight, and review processes.

These measures support strong operational discipline, supplier engagement, and management oversight, which collectively contribute to minimising risk across our business and supply chains.

No modern slavery incidents were reported during the reporting period.

Remediation and Grievance Mechanisms

We encourage reporting of concerns via internal channels through the use of InVivo's whistleblowing mechanism (confidential, no retaliation for good-faith reports). Any identified issues would trigger prompt investigation, remediation (e.g., supplier corrective actions or termination), and support for victims where appropriate.

Any external parties, such as suppliers or customers, wish to report any concerns to the business relating to modern slavery or our code of conduct they have write to the address below or email concerns to privacyuk@soufflet bairdsmalt.co.uk.

Attention: UK General Manager
Soufflet Bairds Malt Limited
Station Maltings
Witham
Essex
CM8 2DU

Collaboration and Next Steps

Bairds Malt complies fully with UK statutory requirements under the Modern Slavery Act 2015. We engage with suppliers to promote awareness and best practices. Going forward, we will:

- Continue risk-based due diligence;
- Review policies/training in line with either the InVivo Group or Soufflet Malt;
- Monitor for emerging risks.

This statement was approved by the board of Soufflet Bairds Malt Limited on 18 May 2026.

Richard Broadbent
UK General Manager
Soufflet Bairds Malt Limited