

Barth-Haas UK Limited

Modern Slavery Statement for Financial Year ending 31st July 2025

Introduction

Barth-Haas UK Limited (“BHUK”) is committed to acting ethically and with integrity in all our business dealings and relationships. Modern Slavery is a crime and a violation of fundamental human rights. We are fully committed to playing our part in eradicating modern slavery by ensuring that slavery, trafficking, child labour, bonded labour, and forced labour does not take place within our business or any part of our supply chain.

The Managing Director holds the responsibility for this policy.

Organisation Structure and Supply Chains

BHUK, a member of the BarthHaas Group of companies, develops, manufactures, and distributes innovative hop-derived products to brewing and related industries around the world. It is also home to BarthHaas X, one of the leading brands within the European craft-brewing sector which has a particular focus on product quality and customer service.

Our UK operations comprise a manufacturing facility located in Paddock Wood, Kent and a warehousing/distribution facility in Huntingdon, Cambridgeshire. Approximately 100 staff are permanently employed by the UK business, supplemented by occasional short-term agency staff when necessary to cover peak workloads or absence.

The hop-based materials we use in our manufacturing processes originate predominately from Group companies in the UK, EU, USA and Australia. Occasionally we source equipment or materials from further afield, so we have therefore worked to identify those products and countries that represent a higher risk of modern slavery and are taking steps to address these risks in our supply chain.

Risk Assessment & Due Diligence

An assessment of the risk of modern slavery occurring within BHUK or its supply chain was conducted in October 2024 and is reviewed annually.

Our October 2025 review concluded that the risk of modern slavery occurring within BHUK continues to be negligible. The UK business complies with all local regulations governing employment activities and demonstrates a fair and just culture towards selection for employment, remuneration of employees and working conditions. The organisation does not employ any person under 18 years of age, only employs persons who have a legal entitlement to employment in the UK and pays all employees at least the UK minimum wage.

As might be expected from a business like BHUK, our supply chain is diverse. We rely on a wide range of suppliers to manufacture and distribute our products including:

- Agency labour to cover sick leave and other absence
- Utilities to power our production facilities
- Hops and other raw materials to make our products
- Packaging to contain and protect our products

- Vehicles and fuel to transport our products to customers or other storage locations
- 3rd party logistics providers to store and distribute our products
- Laundry services for our uniforms and cleaners for our sites
- Software and IT equipment to record and manage our activities
- Professional advisers to help us meet our legal duties and keep on top of our engineering requirements

We recognise that the nature of modern slavery risks will be different for each of these types of suppliers. We consider our direct suppliers of utilities, professional services, software and technology, engineering parts and similar suppliers to all be low risk. Many of our other suppliers are also low risk because they are UK based, and they are not within sectors which are known for being exposed to modern slavery.

However, our original risk assessment did identify the potential for modern slavery to be present in relation to the procurement of some materials, and we recognise that we have a responsibility to address this potential as far as is practicable. Improvement actions taken since October 2024, and further improvements that can be made over the year ahead have been identified and noted below.

Policies, Controls & Training

BHUK complies every day, in all business activities, with external laws and regulations as well as with our established policies and procedures. We facilitate a culture where we can freely discuss and report any ethical, compliance or legal issues.

We continue to participate in the Supplier Ethical Data Exchange (“SEDEX”) programme with the aim to drive improvements in ethical and responsible business practices in our own operations as well as our supply chains.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have incorporated these topics into our routine employee training programme. This is in addition to reiterating the importance of our other policies relating to anti-bribery, bullying and harassment, whistleblowing, equality and diversity as well as our grievance procedure.

Improvement Actions & Performance Monitoring

Our assessment of October 2024 identified risk areas in relation to the procurement of some raw materials such as myristic acid and some consumables such as corporate workwear from existing vendors. The following actions were identified to reduce or eliminate these risks and *updates from our October 2025 review are provided in italics*:

- (i) **Contact suppliers of raw materials identified to be at risk requesting information about their supply chain and measures they have taken to reduce or eliminate the risk of modern slavery within it.**

Requests for information were made to suppliers of 4 raw materials of concern;

- *Myristic Acid & Caustic Soda: Our supplier appears to have a well-developed supply chain management system, including a zero-tolerance policy on child and forced labour which is reportedly audited. To our knowledge, our supplier’s supplier of myristic acid also has a thorough local and industry specific policy and supply chain management system operating in Malaysia; one region of concern.*

- *Linalool: Our supplier recognises modern slavery control as an issue in their general sustainability statement, but there is little evidence of audit or improvement measures.*
- *Lecithin: Our supplier has a policy which does not specifically refer to modern slavery and there is no evidence of actions taken to reduce risk. However, we believe it is unlikely that the lecithin we are currently purchasing is based on sunflower oil derived from material harvested in Burma; the specific source region of concern for forced labour.*

(ii) Contact all suppliers of workwear requesting information about their supply chains and measures they have taken to reduce or eliminate the risk of modern slavery within them.

Requests were made to our 2 largest suppliers of workwear and PPE for information about their supply chains and measures taken to reduce modern slavery risks. Both are small companies; one has undertaken to respond by 31 March 2026, and the other has cited a non-specific supplier qualification process which they operate.

(iii) Contact the provider of the electronic waste service requesting information about downstream recovery activities and measures they have taken to reduce or eliminate the risk of modern slavery within them.

The provider of our electronic waste service has not yet been contacted.

(iv) Consider revising BHUK Terms and Conditions to include appropriate clauses related to the reduction of modern slavery risks.

The Supplier Approval Questionnaire has been revised. While it does include several relevant questions within the Sustainability section, there is still no specific reference to modern slavery, and we acknowledge that this could be improved.

(v) Identify appropriate Key Performance Indicators to track our performance in reducing the risk of modern slavery from within our supply chain.

We defined the completion of an online modern slavery awareness training course to be an appropriate Key Performance Indicator as the business seeks to improve the awareness of staff in this area. During the year, a training course professionally produced by an external training company was selected and provided to employees. As at end-November 2025, 100% of staff have completed the course.

The following improvement actions and KPI monitoring will be progressed and reviewed at the next update of the risk assessment in October 2026.

- (i) Consider whether the revised Supplier Approval Questionnaire is sufficient for highlighting modern slavery risks and reduction programmes in our supply chain.
- (ii) Continue to ensure relevant supply chain information is received and reviewed, in particular for suppliers of workwear and PPE where the highest risks exist.
- (iii) Continue to ensure all staff receive awareness training relating to modern slavery and track the KPI measuring the percentage of staff receiving this training within the preceding 18months.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes BHUK's Modern Slavery Act compliance statement for the year ending 31st July 2025. It was approved by the Board on 1st December 2025 and signed on their behalf.

Signed by:

Stephen Bull

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Stephen Bull
Managing Director, Barth-Haas UK Limited