

MODERN SLAVERY STATEMENT 2026

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Introduction

As a company Blue Sky Botanics Ltd takes its responsibilities to avoid the exploitation of people for personal or commercial gains seriously. Blue Sky Botanics Ltd falls below the legal financial threshold requiring publication of a modern slavery statement; however, we have chosen to publish one voluntarily as part of our commitment to transparency and responsible practice. We are fully committed to playing our part in eradicating modern slavery. We firmly advocate transparency and collaboration to eliminate the risks of modern slavery.

Due to the diverse nature of botanical raw materials and their methods of collection and harvesting throughout the world we recognise that there is a potential for exploitation within the supply chains.

Our modern slavery statement will be updated annually.

Our Business and Supply Chains

Modern slavery is the term used to encapsulate the offences of slavery, servitude, forced or compulsory labour, child labour, sexual exploitation and human trafficking – regardless of whether the victim knew they were being trafficked or not.

Blue Sky Botanics Ltd is a rural based Botanical Extracts manufacturer. We operate solely in the UK, where we have a production unit manufacturing extracts for the food/beverage, cosmetic and animal feed sectors. We employ approximately 44 people from the local area with a handful based remotely around the UK.

The majority of our botanical raw materials are sourced from all over the world, although some botanicals are grown on our site at Castle Farm. A proportion of these raw materials are seasonal. The supply chains can be complex from farms / wild harvested / co-operatives through to traders and onwards to the UK.

All of our supply chains undergo assessment; this includes our supplier approval process and our ethical sourcing system (ESS) due diligence. These processes support us to identify risk areas including those associated with modern slavery. Our ESS utilises the Global Slavery Index as part of the assessment tool, this provides information on the estimated prevalence of modern slavery by country and feeds into our sourcing approach for different countries.

Our UK Network

Blue Sky Botanics Ltd have robust due diligence in place for our own operations. We are BCorp, Ecovadis, Fairtrade and SMETA 4P certified as well as being members of the Union for Ethical Biobased Trade (UEBT) and FairWild. These commitments ensure our values are upheld and that we go above and beyond rather than simply compliance. That being said, these certifications also attest to our compliance with UK labour law.



Supporting Memberships

We are members of Sedex and benefit from guidance, tools and shared expertise from many major retailers and manufacturers who have developed an ethical trade strategy, with focus on labour providers.

SMETA 4-pillar was obtained in March 2023 via an onsite audit and is due for review in March 2026.

Union of Ethical Biotrader (UEBT) support the respect for Human Rights as part of the raw material supply assessment. Universal Declaration of Human Rights: is a critical requirement of the founding principles. As a business we are audited against these standards, both for our operation and our strategic raw materials.

B-Corp certification was achieved in September 2024, affirming our commitment to social and environmental performance.

As well as our botanical supply chains in the UK, there are other material and service providers which make up our UK supply base. These include, freight, maintenance, service contractors, IT etc. All of these businesses operate under UK labour law. Though this is not an absolute safeguard, this does reduce the level of risk and serves as a protective measure.

Our Global Network

The majority of our botanical materials come from all over the world and as mentioned above, they come from a variety of contexts (farms, cooperatives, wild harvesters/collectors and traders).

Due to our scale, it is not always viable for us to buy directly from suppliers at source/producer groups. As a result, we ensure that we build strong relationships with our trader partners.

We choose to work with European traders with robust a code of conduct in place and prioritise raw materials with additional certification to add another layer of verification amongst this network. We have strong working relationships with our EU traders but complete transparency back to source is not always available. This is where we need to ensure that there are additional protective measures in place.

Where it is possible to buy direct from source, we have a greater level of visibility. This supports our understanding of the different factors which may lead to modern slavery within these supply chains and gives us the opportunity to help prevent it.

The key countries which pose the biggest impact aka where the risks are deemed high and we have significant spend are as follows, India and Zimbabwe.

The key raw materials to which we have identified as having inherent risks within our supply chain are Elderflower and Camelia Sinensis.

With regards to our own operations, we deliver value to customers by turning bulky botanical materials into liquid extracts which are used to flavour, add active ingredients or value to beverages, food items and cosmetic products. We operate to a quality management system (BRCGS version 9) to produce high quality, consistent and consumer safe botanical extracts, while remaining ethical and offering a bespoke customer service.

We distribute our products globally.

Figure 1: Destination countries of our botanical extracts.

Austria	France	Italy	Switzerland
Australia	Germany	Netherlands	Thailand
Belgium	Hong Kong	Poland	UK
Brazil	Indonesia	Singapore	USA
Canada	Iran	Slovenia	
China	Ireland	Spain	

Due Diligence Processes

Consultation with our company solicitor, government bodies and agencies such as the UK Gangmasters & Labour Abuse Authority (GLAA), our leading customers and our Union of Ethical BiTrade (UEBT) membership supports our due diligence process.

Risk of modern slavery are dynamic and change quickly. We regularly reassess and assess any new supply chains during our supplier approval process which is in line with the British Retail Consortium Global Standards (BRCGS). We have a Supply Chain Manager and Strategic Sourcing Manager who work alongside our commercial and technical quality teams to establish risk in supply chains. Using UEBT risk assessment tools, collaboration with our botanical traders, who have the benefit of economies of scale which consequently leads to better supplier engagement, we are able to get greater visibility of the supply chain that we would have as a small business.

Working with natural materials comes with inherent risks. Agricultural work is identified by the Global Slavery Index (GSI) as being a particular area at risk of forced labour due to the nature of the work both in its physicality and being an area that is often less heavily regulated. This can leave workers vulnerable to exploitation, which is further compounded when a migrant workforce is used.

We commit to carrying out an annual supplier review and take a continuous improvement approach on enhancing our current supply chains to ensure we are working with and promoting suppliers who prioritise positive social and ethical standards. This includes setting targets of improvement with regards to our spend on supply chains that fit our sourcing category model of assessment, identifying new and emerging risk areas and developing strategies for managing/minimising these risks.

Tackling Modern Slavery – our business

In our own operations all of our colleagues are employed on permanent contracts, observing UK employment law, including the current minimum wage level. Recruitment is made by advertising both internally and externally in the UK. Any temporary workers we may recruit in future, i.e. during peak demand, will be recruited from within the UK, receive a reasonable number of paid hours each week and have the opportunity to transfer to permanent employment when vacancies arise.

The greatest risks of modern slavery exist for workers not in permanent employment. Our recruitment policy is in line with SMETA 4 pillar standard and government requirements to ensure responsible recruitment is undertaken, with an awareness to the standards of the Stronger Together Initiative.

Tackling Modern Slavery – our supply chains

We assess the potential human rights risks of our supply chains by considering the country of origin where we are sourcing products or raw materials from, as well as the type and format of the materials we are sourcing.

Assessing and managing risk will include:

- A review of current ethical sourcing management systems, company policies and existing risk management tools.
- Research into the challenges faced by suppliers at industry and country level for fresh produce and horticulture.
- Recommendations on areas for improvement in addressing modern slavery hotspots and risks with suppliers.
- Our Ethical Sourcing System utilises the Global Slavery Index to assess and measure the modern slavery risk by country of origin. This helps us identify high risk materials and implement strategies to manage these.
- We utilise third party accredited ethical schemes as part of our sourcing and procurement practice including FairWild, FairTrade, Fair for Life, UEBT and Rainforest Alliance.

- Should practices of concern arise, we will work with our supplier to address and resolve these issues. It is important to work together to tackle issues where the supplier is open to this. Where there is no willingness to engage, we will resource the ingredient.
- Audits and site visits will be conducted where possible and in line with our ethical sourcing policy.

Awareness raising and capacity building

We have identified that non-permanent employees may be found throughout our supply chains due to seasonal harvesting, wild harvesting or agricultural practices used to collect botanical raw materials.

The company operates a whistleblowing policy aimed principally at our workers. Longer term our expectations will be that all of our supply chains introduce these policies to encourage their workers to report any concerns about human rights violations or any other wrong doings within their business.

All of our Elderflower suppliers have been issued with and are required to comply with the ETI Base Code as a minimum requirement. <https://www.ethicaltrade.org/insights/resources/eti-base-code>

We will continue working with our Elderflower suppliers in to include commercial contractual terms requiring their compliance with the Modern Slavery Act 2015.

Our employees and suppliers can play an important role in helping us to ensure that modern slavery abuses do not take place in our business or supply chains. We will continue to deliver various training activities to raise awareness and inform our employees about the issue.

These include:

- Specific Modern Slavery Awareness training for our Senior Management Team.
- Awareness training using Stronger Together (S2G) tools for existing workers.
- Improvement in induction training to include Modern Slavery Awareness.
- We will encourage all our strategic suppliers* to use the S2G tools within their own businesses and supply chains.
- Attendance and participation in training workshops and specific customer lead initiatives for the employees involved in the supply chain.

**Strategic suppliers as identified by volume and value identified in our UEBT workplan.*

Monitoring

To assess the effectiveness of the measures taken by the company we will apply the following KPI's in relation to our current financial year and compare the results with the previous year.

- Workers trained on modern slavery.
- Increase our overall ESS score on primary supply chains.
- Increase our spend towards supply chains with an allocated sourcing category.
- Incidents reported by whistleblower disclosures.

Plans for 2026

As detailed in this statement, we have sought to adopt a thorough and robust approach to tackle modern slavery in our business and supply chains. We will continue to identify and focus on our strategic (large volume / value) raw materials.

The company will continue to enhance our policies and practices including encouraging the implementation of worker voice mechanisms throughout our supply chains. This will aid protection of worker rights and develop identification and remediation protocols.

We aim to create an internal sustainability committee to monitor and maintain our supply chains. Within Blue Sky Botany Ltd, we will continue to strengthen our supplier relationships and for our own workers, ensure that there is a platform to raise concerns through both our policies and employee feedback.



The following areas are also being addressed in 2026:

- Review and improve our Whistleblowing and Grievance mechanisms to ensure that these are transparent and accessible to all actors within our supply chain.
- To provide further training for Blue Sky Employees who carry out supplier visits to ensure they can identify signs of slavery and know the appropriate steps to take.
- To review and implement an improved ethical sourcing system to support in the identification of risks and mechanisms to manage these within our supply chains.

This statement is published on the company website and a link to the statement may be found on the company intranet homepage.

This statement has been approved by the Blue Sky Board of Directors and signed on behalf of the board by:

Printed: Caroline Brevitt

Printed: Erica Pritchard

Position: Managing Director

Position: Technical Director

Date: 30/01/2026

Date: 30/01/2026

Signature:

Signature: