



**ED&F
MAN**
EST. 1783



Modern Slavery Statement 2021-22

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ED&F Man Modern Slavery Statement 2021-22

The ED&F Man Group welcomes the UK Modern Slavery Act and the responsibility it places on businesses to disclose publicly the steps they are taking to tackle forced labour and human trafficking.

Child labour, forced labour and other modern slavery issues exists in many value chains and fighting it, first and foremost, is a responsibility of governments. But the private sector has an important role to play. We have a zero-tolerance approach to modern slavery in our own operations and work with our partners towards eradication. We support the UN Convention on Human Rights, and we are committed to transparency in our supply chains and business operations.

This Statement sets out the steps taken by ED&F Man and our businesses during the year ending 30 September 2022 to prevent modern slavery and human trafficking in our business and supply chains. We have worked hard to ensure we have the most effective responses to the risk of modern slavery in place in our businesses.

This is the sixth ED&F Man Modern Slavery statement.

Our business

ED&F Man is one of the world's leading providers of agricultural commodities, logistics and financial services. We trade sugar, coffee, molasses, pulses and animal feed.

We employ 5,000 people in 58 countries across Europe, the Americas, Asia, Africa and the Middle East and have an annual revenue of \$7.4 billion (year ended 30 September 2022).

Our supply chains are extensive and global; we serve over 15,000 customers from over 14,000 suppliers, these being producers, exporters, intermediaries, or other traders. Details on our international locations can be found on our website.

Social responsibility

We are committed to being a responsible member of the communities in which we work and to engage in dialogue with our various stakeholders.

We respect the United Nations' Universal Declaration of Human Rights and International Labour Standards. This means that we strive to ensure that all our employees experience a healthy and safe workplace. We do not discriminate in our employment practices, do not use child or forced labour, and we respect the rights of all our employees.

Where we operate around the world, we actively work to protect the environment by participating in a wide variety of sustainability programmes. We also respect natural resources and strive to reduce the use of energy, water, waste created and our carbon footprint.

We comply with the law and have a policy of zero tolerance towards corrupt practices. As well as our own commitments, we also expect direct suppliers to comply with our Standards of Business Conduct.

Organisational structure

The Group is controlled and managed by the Board of Directors of ED&F Man Holdings Ltd which is located in the Group's London office. The Board delegates authority to the Group's individual trading

divisions to formulate and implement business strategy and manage commercial operations on the basis that the divisions are obligated to embed in their operations the Board established policies, procedures, culture and values.

The Report covers our UK entities and all our global component businesses and wholly-owned subsidiaries:

ED&F Man Holdings Ltd	ED&F Man Liquid Products UK Ltd
Volcafe SA	ED&F Man Sugar Ltd
ED&F Man Liquid Products Nederland BV	

Relevant documents mentioned in this declaration can be found on our [website](#). The Group's Board has approved this statement and it is signed by Chris Mahoney, Chairman.

EXECUTIVE SUMMARY

ED&F Man and all its globally owned businesses, are committed to conducting business in an ethical and responsible manner. As part of this commitment, we fully support the UK Modern Slavery Act of 2015 ("the Act") and its aim to eradicate modern slavery and human trafficking from our supply chains and operations. We recognize that modern slavery is a global issue that affects millions of people around the world. As a result, we are committed to ensuring that we do not knowingly engage in any form of modern slavery or human trafficking. We recognize our responsibilities under the Act and are committed to taking all necessary steps to ensure compliance with this legislation.

Our Policy Statement:

Our company operates a zero-tolerance approach to modern slavery, forced labour, and human trafficking. We will not knowingly support, facilitate, or condone any activity that involves modern slavery or human trafficking in our operations or supply chains. We are committed to conducting business in an ethical and socially responsible manner, in line with ED&F Man's Standards of Business Conduct document, and we expect the same standards from our suppliers, contractors, and business partners by requiring them to sign and return a copy of our Supplier Code of Conduct as part of the supplier evaluation and onboarding process.

Due Diligence and Risk Assessment:

We conduct due diligence on all new suppliers, contractors, and business partners to ensure they comply with the UK Modern Slavery Act. We conduct risk assessments of our supply chains to identify any areas of potential risk and take appropriate steps to mitigate these risks. We monitor our supply chains on an ongoing basis to ensure that our suppliers, contractors, and business partners continue to comply with our policies and standards.

Training:

Through our Standards of Business Conduct education we set standards to ensure our colleagues operate lawfully and ethically, are environmentally and socially responsible and that all workers are treated with respect and dignity. This training is mandatory for all new employees and is refreshed regularly to ensure that all parties are aware of our policies and procedures.

Reporting and Whistleblowing:

We encourage all employees and suppliers to report any concerns or suspicions of modern slavery, forced labour, or human trafficking to us, and have established reporting and whistleblowing mechanisms to enable employees, suppliers, and other stakeholders to report any concerns they may have. Reports can be made anonymously, and we will ensure that any reports are taken seriously and investigated promptly.

Key Performance Indicators, Monitoring and Review:

We monitor and review our policies and procedures on an ongoing basis to ensure they remain effective and comply with the UK Modern Slavery Act. We report on our compliance with this legislation in our annual reports.

Conclusion:

We are committed to upholding the highest standards of ethical and social responsibility in our operations and supply chains. We recognize our responsibilities under the UK Modern Slavery Act, and we will take all necessary steps to ensure continuous compliance with this legislation. We continue to monitor our operations and supply chains to ensure that they remain free from modern slavery, forced labour, and human trafficking.

OUR POLICIES

Supplier Code of Conduct

ED&F Man works hard to maintain high standards of business conduct. Our values and our Standards of Business Conduct ensures that we comply with the law, but it also demonstrates our core values, our commitment to act in good faith and to hold ourselves accountable. We are a global business, so we understand that local customs, conditions and business practices may vary - but we must uphold our core values and ethical principles wherever we operate. Our own customers demand this too. We therefore only work with suppliers who share our commitment to protecting basic human rights and who understand their social and environmental responsibilities.

To uphold our core values and ethical principles wherever we operate, also up the supply chain from where we source, we require our suppliers to sign our Supplier Code of Conduct document, thereby acknowledging their commitment to comply with the law, and share our core values and ethical principles.

Human rights

Our group-wide CSR policy supports the UN's Universal Declaration of Human Rights. As a Group we commit that:

- All employees are employed of their own free will.
- Local communities can express their concerns to the company.
- We do not tolerate or condone human-rights abuses.
- We do not tolerate or condone corporal punishment or physical oppression.
- When we rely on security staff, we have appropriate standards of conduct and controls in place for them.
- We allow freedom of association - a person's right to join or leave a group - and collective bargaining - a group of employees' right to negotiate wages and employment terms.

Labour standards

We support the principles of the International Labour Organisation's (ILO's) Declaration of Philadelphia that labour is not a commodity. As a Group we commit to:

- Comply with the national labour laws of all countries in which we operate.
- Pay at least local minimum wages.
- Provide clear terms of employment.
- Ensure working hours are reasonable and comply with national working-time regulations.
- Develop employees' skills through training.
- Ensure there is an effective grievance procedure available to employees.

Child labour

We respect the ILO convention on child labour and children's right to an education. We also support the ending of harmful child labour. The following applies to all our companies.

People aged below 18 are employed only in compliance with local law, UN guidelines and ILO conventions where they may only perform "light work", must be properly supervised, and their work must not interfere with

their physical health or moral development.

We will not employ children under the age of 15.

We are confident there is no slavery or human trafficking in our directly managed organisation. However, as an agricultural commodities company that works extensively with partners, suppliers and customers across the world, parts of our supply network may be at risk of slavery, trafficking, child or forced labour. We work closely with suppliers to uphold proper practices in our supply chains. We require our suppliers to comply with our standards and to share our commitment to ethical business conduct - including signing and adhering to our Supplier Code of Conduct, which is available to read on our website.

KEY PERFORMANCE INDICATORS

Certifications

ED&F Man's products are all responsibly sourced. A range of our products are sourced under the standards of the following third-party sustainability certifications and company programmes.

	Coffee	Sugar	Liquid Products
4C	X		
AAA Quality Program	X		
Bonsucro		X	X
C.A.F.E. Practices	X		
Fair Trade	X	X	
ISCC			X
MarinTrust			X
Organic	X	X	X
Rainforest Alliance	X		
VolcafeWay*	X		

Certifications may be in place in selected countries / entities
 * = As of FY22/23 VolcafeWay will be called Volcafe Excellence

Annually ED&F Man reports its global energy and water use, as well as its carbon emissions in the Carbon Disclosure Project.

ED&F Man is a (B) member of Sedex, the Supplier Ethical Data Exchange, a not-for-profit organisation that allows businesses share information and promotes ethical and responsible business practices in supply chains.

Volcafe as a Business Unit, and ED&F Man Sugar in Madrid have [Ecovadis](#) Gold Rating.

TRAINING AND COMMUNICATION

Training our employees

ED&F Man operates a global e-learning platform providing a range of e-learning to all global employees. Training is scheduled on a range of subjects including health & safety, cyber security, ethics, bribery and corruption and data security. Training on our Standards of Business Conduct is provided during induction and then at regular intervals thereafter.

Listening to our stakeholders

We have two main points of contact for external and internal issues:

legal.csr@edfman.com : bribery & corruption, gifts & entertainment, money laundering.
mlro.csr@edfman.com ; money laundering, central investigating officer.

We also have a contact email for any corporate social responsibility issues csr@edfman.com.

We take all reports of possible wrongdoing seriously and we encourage anyone with concerns regarding ethics, compliance or other serious matters to raise them with their manager or by emailing above references.

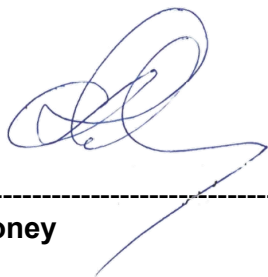
Where necessary, messages received on this address will be handled in accordance with our Whistleblowing Policy which is available to read on our website.

SUPPLY CHAINS, DUE DILIGENCE PROCESSES, RISK ASSESSMENT AND MANAGEMENT – UPDATE 2021-22

We continued the work we do to ensure responsible trading, including work to prevent modern slavery and human trafficking, in our business and supply chains.

ED&F Man trades in various commodities. For most, we occupy a place in the middle of supply chains from sourcing to supply, in direct relationships with producers from whom we source and then we sell on to manufacturers, roasters and wholesalers, rather than direct to consumers.

Our most recent annual reports and CSR reports contain progress updates from our businesses and supply chains can be found [here](#) on our website.



Chris Mahoney
Chairman