ED&F MAN
EST. 1783

UK and Australia Modern Slavery Act Statement 2025

This Statement sets out the steps taken by ED&F Man and our businesses during the year ending on 31 December 2025

June 2026

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ED&F Man UK and Australia Modern Slavery Act Statement 2025

As a global trader of agricultural and soft commodities, ED&F Man operates complex international supply chains involving approximately 18,400 suppliers and 3,000 employees across more than 40 countries. We recognise that the scale, geographic reach, and nature of our operations may give rise to heightened human rights risks, including risks related to forced labour, child labour, human trafficking, and other forms of modern slavery. We therefore recognise our responsibility to identify, assess, and address these risks across our operations and business relationships.

ED&F Man maintains a strict zero-tolerance approach to modern slavery, forced labour, human trafficking, and child labour. We are committed to ensuring that all work is freely chosen and expect our suppliers and business partners to uphold the same standards. We seek to identify and manage modern slavery risks through a risk-based approach that reflects the nature of our business, the complexity of global supply chains, and the varying risk profiles of different sectors and regions. Any identified breaches are treated seriously and addressed through appropriate corrective action. Our approach is informed by internationally recognised human rights frameworks, including the principles set out by the United Nations, and is supported by our human rights, responsible sourcing, and due diligence processes.

We welcome the increasing focus by governments, regulators, and industry stakeholders on human rights and supply chain due diligence. In line with this commitment, we support the objectives of the UK Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018 (the Acts), which seek to address the risks of modern slavery and human trafficking in business operations and supply chains through greater transparency and accountability. We also continue to monitor and prepare for emerging regulatory developments, including the EU Corporate Sustainability Due Diligence Directive and the EU Forced Labour Regulation.

This Statement sets out the actions taken by ED&F Man Commodities during the 2025 financial year to identify, assess, mitigate, and address modern slavery risks within our operations and supply chains. It also outlines our ongoing efforts to strengthen due diligence, promote responsible sourcing, engage with suppliers and other stakeholders, and support positive social outcomes in the communities connected to our value chains.

This Statement was approved by the board of directors of each reporting entity listed below.

On behalf of **ED&F Man Commodities Limited**

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Chief Financial Officer of Hartree Europe and ED&F Man

On behalf of **E D & F Man Sugar Limited**

Johanna Sutcliff
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On behalf of **E D & F Man Liquid Products UK Limited**

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On behalf of **E D & F Man Fishoils Limited**

Seth Wells

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Stephen Bannister
Director

Scope of this Statement

This Statement has been prepared in accordance with the requirements of the UK Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018 and has been informed by the *International Reporting Template on Modern Slavery, Forced Labour and Child Labour*.

This Statement is published jointly by the following reporting entities:

UK Modern Slavery Act 2015 reporting entities:

- ED&F Man Sugar Limited (Sugar BU)
- ED&F Man Liquid Products UK Limited (MLP BU)
- ED&F Man Fishoils Limited (MLP BU)
- Volcafe Ltd (Coffee / Volcafe BU)

Australia Modern Slavery Act 2018 reporting entity:
Cofi-Com Trading Pty Ltd (Coffee / Volcafe BU).

Application of Group and business-unit disclosures

The reporting entities operate within ED&F Man's business-unit structure and use Group and business-unit governance arrangements, policies, due diligence processes, responsible sourcing procedures and supply-chain management systems.

Unless expressly stated otherwise:

- the Group-level governance, Standards of Business Conduct, Responsible Sourcing Policy, Supplier Code of Conduct, counterparty due diligence and Speak Up arrangements described in this Statement apply to all reporting entities;
- disclosures relating to the Sugar Business Unit apply to ED&F Man Sugar Limited;
- disclosures relating to the MLP Business Unit apply to ED&F Man Liquid Products UK Limited and ED&F Man Fishoils Limited only to the extent relevant to their respective products, operations and supply chains. Where a disclosure relates to a specific product, the applicable reporting entity is identified;
- disclosures relating to Volcafe's governance, Human Rights Due Diligence and Human Rights and Environmental Due Diligence frameworks, supplier due diligence, grievance mechanisms, training and effectiveness monitoring apply to Volcafe Limited and Cofi-Com Trading Pty Ltd, except where a disclosure is expressly limited to a named entity, country, origin programme or supply chain; and
- entity-specific sourcing origins are presented in Figures 1 to 5.

Cofi-Com Trading Pty Ltd did not own or control any entities during the reporting period.

Where a risk, action, programme, outcome or performance indicator applies only to a particular reporting entity or business unit, this is identified in the relevant section. Where an arrangement is described at Group or business-unit level, this applies to all reporting entities.

The Cotton business unit and its constituent entities are not reporting entities under either Act and are therefore outside the scope of this Statement.

Table 1 Reporting Entity Scope

Reporting entity	Business unit	Principal products and supply chains	Disclosures generally applicable
ED&F Man Sugar Limited	Sugar	Sugar sourcing, trading, logistics and distribution	Group arrangements and Sugar BU disclosures
ED&F Man Liquid Products UK Limited	MLP	Molasses and molasses-derived products trading, logistics and distribution.	Group arrangements and MLP BU disclosures
ED&F Man Fishoils Limited	MLP	Fish oil and fish meal trading, logistics and distribution	Group arrangements and MLP BU disclosures relevant for fish oil and fish meal
Volcafe Limited	Coffee	Global green-coffee trading, logistics and distribution	Group arrangements and Volcafe BU disclosures
Cofi-Com Trading Pty Ltd	Coffee	Green-coffee trading, logistics and distribution	Group arrangements and Volcafe BU disclosures; no controlled entities

This statement covers the period from 1 January 2025 to 31 December 2025.

1. Our business

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

ED&F Man operates four business units (BUs): Sugar, Liquid Products (MLP), Coffee / Volcafe, and, since June 2025, Cotton. In 2025, ED&F Man was acquired by Hartree Partners, LP. Following the acquisition, ED&F Man continues to operate under a centralised governance structure, with common policies, strategy, and risk management frameworks across its businesses. In 2025 we employed an average workforce of 2,824 people across 41 countries in Europe, the Americas, Asia, Africa, and the Middle East.

1.1 Legal structure

ED&F Man Sugar Limited, ED&F Man Liquid Products UK Limited and ED&F Man Fishoils Limited, each of which is incorporated in England and Wales, are subsidiaries of ED&F Man Commodities Limited, a company incorporated in Jersey.

Volcafe Ltd, a company incorporated in Switzerland, is a subsidiary of ED&F Man Holdings B.V., a company incorporated in the Netherlands. ED&F Man Holdings B.V. is itself a subsidiary of ED&F Man Commodities Limited. Accordingly, Volcafe Ltd is an indirect subsidiary of ED&F Man Commodities Limited.

Cofi-Com Trading Pty Ltd, a company incorporated in Australia, is a subsidiary of Volcafe Ltd. Cofi-Com Trading Pty Ltd does not own or control any other entities.

1.2 Information on supply chains

Our supply chains are extensive and global, reflecting the scale and complexity of our operations. During the reporting period, we shipped approximately 14.5 million tonnes of commodities and products and sourced from around 18,400 suppliers, including approximately 9,250 smallholders. Our suppliers comprise producers, exporters, intermediaries, logistics providers, and other trading partners across multiple jurisdictions.

For the purposes of this statement, a **Tier 1 supplier** is an external supplier that supplies goods or services directly to a reporting entity or one of its subsidiaries. Transactions between entities within the Group are not treated as Tier 1 supplier relationships.
Across all reporting entities and business units, 100% of Tier 1 suppliers are identified. The extent of traceability beyond Tier 1 varies by business unit, commodity, sourcing model and supply chain.

For **Volcafe BU** all Tier 1 suppliers are known, and for responsibly sourced, certified, and European Union Deforestation Regulation (EUDR)-compliant supply chains, Volcafe BU maintains traceability to producer and plot level.

The **Sugar** and **MLP BUs** share certain supply chains. Although all Tier 1 suppliers are identified, tracing commodities to individual farmers or plots remains challenging due to the structure and complexity of these supply chains, including aggregation and processing at sugar factories and mills. Current traceability beyond Tier 1 is therefore generally focused on identifying the relevant sugar factory or mill rather than the individual farmer or plot.

The Group recognises that traceability beyond Tier 1 remains limited in certain Sugar and

MLP supply chains and that further work is required to improve the completeness, consistency and reliability of upstream supply-chain data. Although the Group has not established formal traceability targets or a defined timetable for addressing these limitations, it intends to continue working with suppliers and relevant business units to improve upstream visibility, where available. The Group will keep its approach under review as its traceability capabilities and the availability and quality of supply-chain data develop.

Sugar Business Unit

Sugar BU is the Group's global sugar trading and supply chain business, sourcing, transporting, storing, and distributing approximately 6 million tonnes of sugar annually. The business operates across multiple origin and destination markets, linking sugar producers with customers through a global network of trading, logistics, and distribution operations. Given the scale and geographic reach of its supply chains, ED&F Man Sugar Limited works with a diverse range of suppliers, producers, logistics providers, and other business partners. The business is committed to promoting responsible business practices and addressing human rights risks within its operations and supply chains. Sustainability considerations, including responsible sourcing, supplier engagement, and support for industry initiatives such as Bonsucro, form part of its approach to strengthening supply chain transparency and contributing to more sustainable and resilient sugar value chains. The following Figure 1 presents the countries of origin from which ED&F Man Sugar Limited imported sugar into the United Kingdom during 2025.

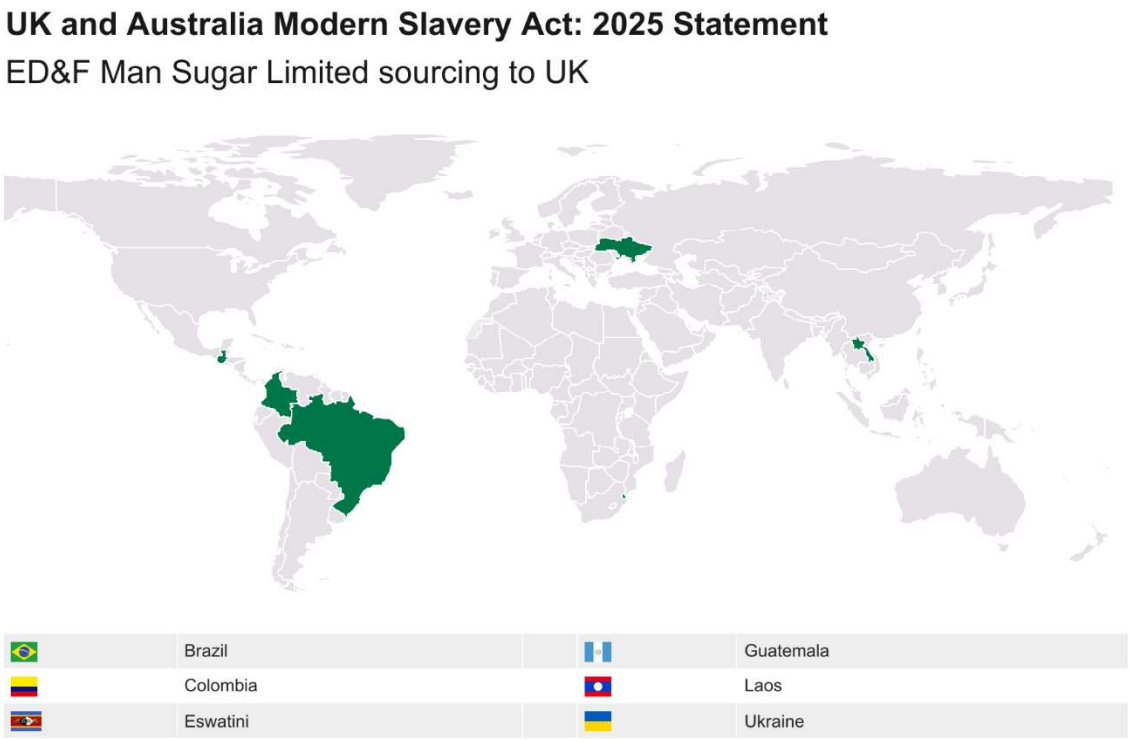


Figure 1 Import origins **–** ED&F Man Sugar Limited (2025)

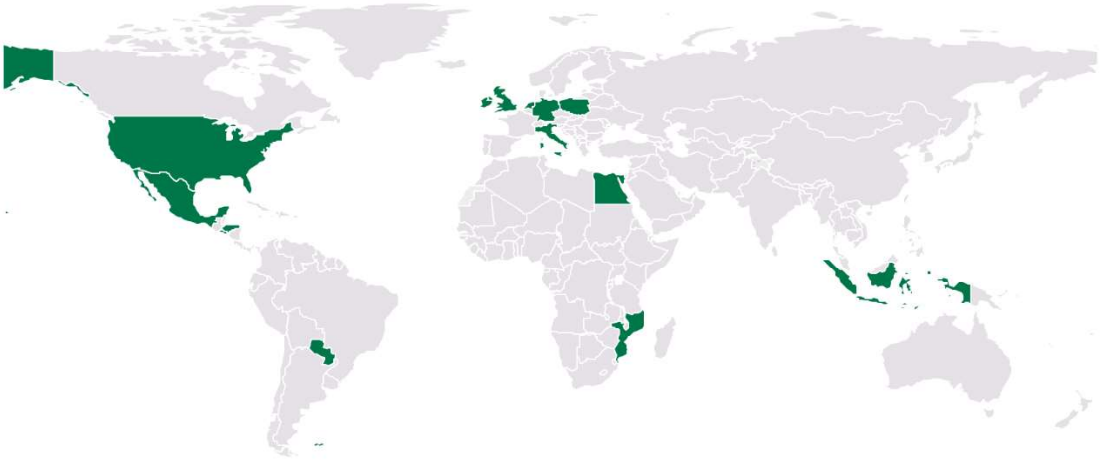
MLP Business Unit

MLP BU is the Group's global supplier of feed ingredients and related services. The business manages six core platforms, including molasses trading, feed manufacturing and distribution, beet pulp pellets, feed ingredients (including fish oil), specialty fertilizers, and pulses. Its operations are coordinated through major trading offices in Amsterdam and New Orleans, supported by a network of offices across Europe, the Americas, and Asia.

ED&F Man Liquid Products UK Limited is a leading supplier of molasses and molasses-based liquid products to the animal feed, fermentation, agricultural, and industrial sectors in the United Kingdom. As part of the ED&F Man group, the company specialises in the sourcing, storage, blending, logistics, and distribution of molasses and related liquid co-products, supported by an extensive supply chain and storage network. Through its focus on quality, reliability, technical expertise, and sustainable solutions, ED&F Man Liquid Products UK Limited helps customers meet their operational needs across a range of applications, including livestock nutrition, feed manufacturing, industrial fermentation, fertiliser production, and other industrial processes. The following Figure 2 presents the countries of origin and the products imported into the United Kingdom by ED&F Man Liquid Products UK Limited during 2025.

UK and Australia Modern Slavery Act: 2025 Statement

ED&F Man Liquid Products sourcing to UK



Country	Products	Country	Products
Egypt	Molasses (CMS)	Mexico	Molasses (Cane)
El Salvador	Molasses (Cane)	Mozambique	Molasses (Cane)
Germany	BPP (Sugar beet pulp pellets)	Netherlands	Molasses (Beet, CMS)
Honduras	Molasses (Cane)	Paraguay	Molasses (Cane)
Indonesia	Molasses (Cane)	Poland	Molasses (Beet)
Ireland	Molasses (Blend ingredients)	United Kingdom	Feeder, Molasses (Blend ingredients, Potale)
Italy	Fertiliser	United States	Molasses (Cane)

Figure 2 Import Origins by Product Category – ED&F Man Liquid Products UK Limited (2025)

ED&F Man Fishoils Limited is part of the MLP business and specialises in the global sourcing, trading, storage, and distribution of certified and conventional fish oils. The business serves customers in the aquaculture sector, providing end-to-end supply chain

services including sourcing, shipping, storage, and logistics. The following Figure 3 presents the countries of origin from which ED&F Man Fishoils Limited imported fish oil and fish meal into the United Kingdom during 2025.

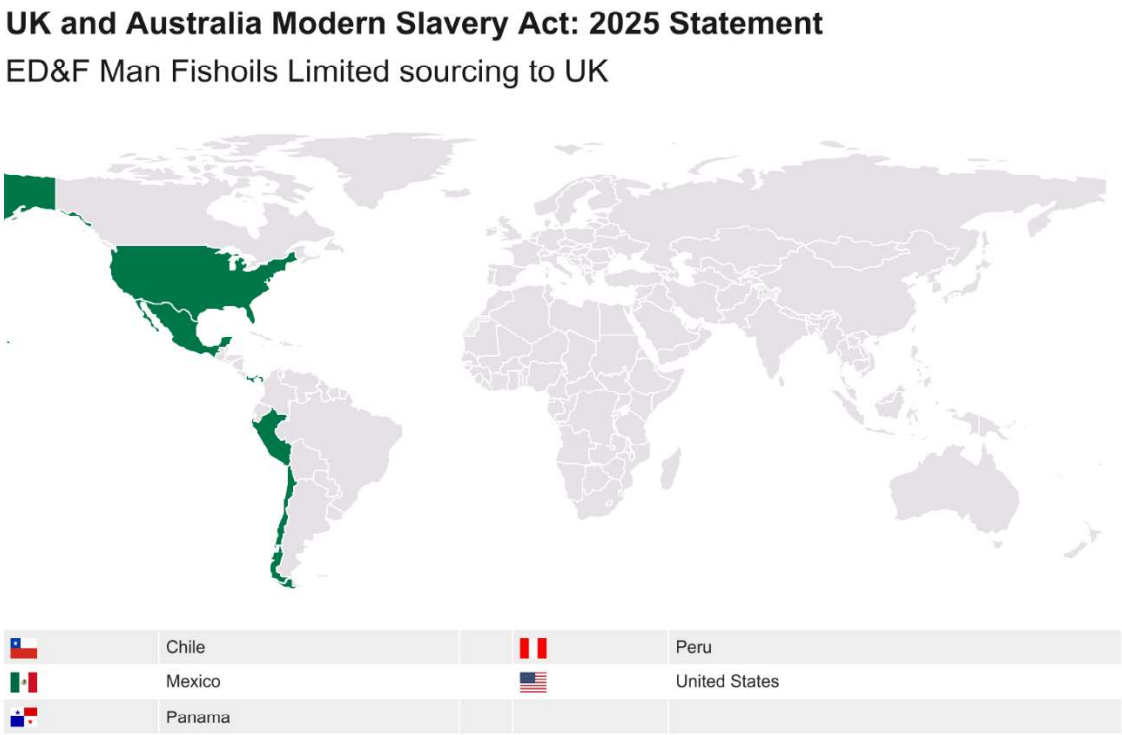


Figure 3 Import origins **–** ED&F Man Fishoils Limited (2025)

Coffee / Volcafe Business Unit

Volcafe BU, the coffee business of ED&F Man, is a global green coffee merchant with a history dating back to 1851. Operating in 15 origin countries and 11 destination countries, Volcafe BU sources coffee directly from farmers, cooperatives, farmer associations, local exporters, and other supply chain partners. Its supply chains span a diverse range of coffee-producing regions, involving both smallholder and larger-scale producers. Following primary and secondary processing, green coffee beans are exported by vessel to customers worldwide, primarily coffee roasters. Through its origin and destination network, Volcafe BU manages the sourcing, processing, logistics, and delivery of coffee, providing visibility across its supply chains and supporting greater transparency from farm to customer.

The following Figure 4 presents the countries of origin from which Volcafe Ltd sourced coffee imported into the United Kingdom during 2025.

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Volcafe Ltd coffee sourcing to UK

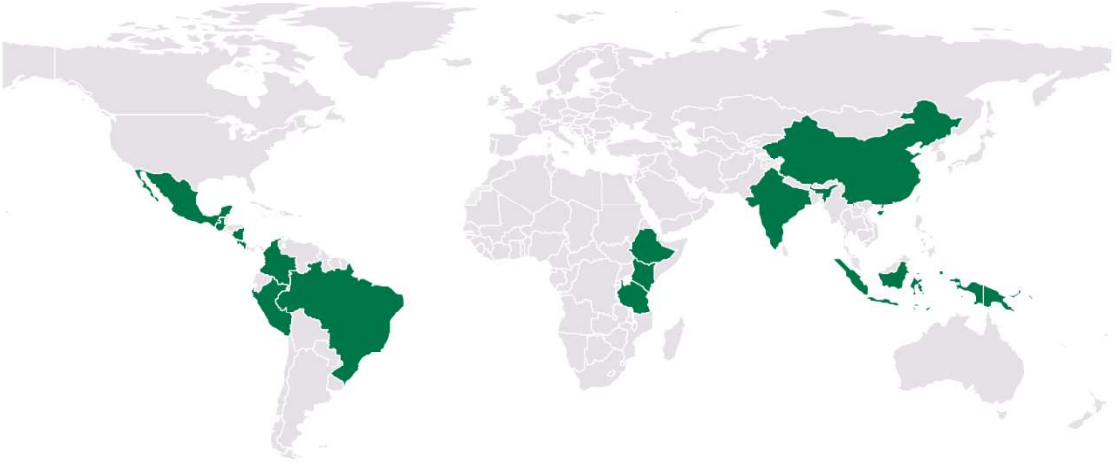
Brazil		Guatemala		Tanzania	
Burundi		Honduras		Uganda	
Colombia		Nicaragua		Vietnam	
Ethiopia		Peru			

Figure 4 Import origins **–** Volcafe Ltd (2025)

For the purposes of the Australia Modern Slavery Statement, the following Figure 5 illustrates the countries of origin for coffee imported into Australia by Cofi-Com Trading Pty Ltd during 2025.

UK and Australia Modern Slavery Act: 2025 Statement

Cofi-Com coffee sourcing to Australia



	Brazil		Guatemala		Nicaragua
	China		India		Papua New Guinea
	Colombia		Indonesia		Peru
	Costa Rica		Kenya		Tanzania
	Ethiopia		Mexico		

Figure 5 Import origins **–** Cofi-Com Trading Pty Ltd

1.3 Modern slavery risk management governance

Responsibility for identifying, assessing and responding to modern slavery risks is embedded within ED&F Man's risk management governance framework.

The Sustainability Committee provides oversight of the identification, assessment and reporting of ESG-related risks, including modern slavery and broader human rights risks, across the Group. The Committee recommends actions, priorities and key performance indicators (KPIs) aligned with ED&F Man's Sustainability Strategy, which is structured around three pillars: Environmental Stewardship, Improving Lives and Responsible Sourcing. Responsibility for implementing these actions, as well as conducting ongoing human rights due diligence and risk assessments, rests with the relevant business units.

The Sustainability Committee is chaired by the Chief Financial Officer (CFO), who is responsible for managing Group risks and is a member of the ED&F Man Commodities Executive Management Committee. The Vice Chair of the Sustainability Committee also sits on the ED&F Man Executive Management Committee, helping to ensure alignment between sustainability risk management and business decision-making.

The ED&F Man Commodities Executive Management Committee (formerly the Boards of Directors of ED&F Man Holdings and ED&F Man Commodities) provides senior-level oversight of sustainability and modern slavery risks. Members of the ED&F Man Executive Management Committee are invited to attend the Sustainability Committee's bi-annual meetings, where Group Sustainability and Business Unit Sustainability Leaders provide updates on key ESG matters, including modern slavery risks, human rights due diligence activities and mitigation measures. This governance structure supports effective oversight, accountability and management of modern slavery risks across the Group.

1.4 Approach to statement preparation and stakeholder engagement

To support compliance with legislative reporting requirements, **ED&F Man** draws on information captured through its operational systems and internal consultation processes. All transactions and shipments undertaken by the business are recorded in designated software systems, which capture data on suppliers, product type and origin, volumes traded, and relevant logistics providers, including shippers and hauliers. This information enables an overview of supply chains and the key stakeholders involved and may be used for supply-chain analysis and risk assessment purposes.

The development of this statement involved consultation with sustainability leads from each business unit, as well as representatives from operational, finance and legal functions. These internal stakeholders contributed information and perspectives relevant to their areas of responsibility, supporting a coordinated approach to the preparation of this statement.

As part of its approach to mapping and understanding its green coffee supply chains, **Volcafe BU** engages with a range of external stakeholders, including:

Technology companies

- Digital technology providers, such as Meridia, to support traceability, geospatial verification, data quality checks, and risk identification within agricultural supply chains, and to strengthen visibility and risk detection at farm and supplier level (including through digital platforms used within Volcafe's due diligence systems).

Industry initiatives and multi-stakeholder platforms

- Industry-led initiatives focused on addressing labour and human rights risks in agricultural supply chains, including participation in multi-stakeholder platforms, such as the ILO Child Labour Platform, convened to support the prevention of child labour and forced labour in the coffee sector.

Non-governmental organisations (NGOs) and civil-society partners

- Local and international NGOs engaged through origin-level programmes, training activities, and remediation-focused partnerships, particularly in contexts where risks related to labour rights or worker vulnerability are elevated.

Worker representation

- Engagement with worker representatives takes place at local level where applicable, including through local grievance mechanisms and formal escalation channels, in line with Volcafe's commitment to freedom of association.

Government agencies and public authorities

- Engagement with national and local authorities in producing countries, where relevant, including in the context of regulatory compliance, grievance handling, and collaboration on labour and human-rights-related matters. Participation in the

International Coffee Organization's Coffee Public-Private Task Force Coordinator
- Engagement with industry associations, such as the European Coffee Federation and the Swiss Coffee Trading Association to better understand regulatory requirements and opportunities for industry alignment and pre-competitive initiatives.

Within the **Sugar BU**, we participate in the Sugar Collaboration Group, which supports the mapping of sugar supply chains and the identification of supply chain risks. In addition, we have a contractual arrangement with FoodChain ID to support the assessment and monitoring of deforestation risks within the Brazilian sugar supply chain, enhancing supply chain transparency and informing our due diligence processes.

Within the **MLP** and **Sugar BUs**, Bonsucro certification is an important tool for enhancing transparency and traceability within sugar and molasses supply chains. Through the use of Bonsucro-certified products and the Bonsucro Chain of Custody (ChoC) standard, MLP and Sugar businesses are able to obtain greater visibility over the movement of certified sugarcane-derived products through the supply chain. The Bonsucro ChoC standard requires participating organisations to maintain documented systems for tracking certified material and validating supply chain data, providing assurance that sustainability claims are supported by verified records. This strengthens our understanding of supply chain relationships from origin through to end markets. In addition, Bonsucro certification incorporates environmental and social criteria for sugarcane production, helping to support due diligence efforts and providing additional information to inform the assessment of potential human rights and supply chain risks. ED&F Man remains an elected representative for the intermediary (trader) class of members on the Bonsucro Members' Council.

1.5 Progress in Supply Chain Mapping and Transparency

Changes in knowledge since the previous Modern Slavery Statement
Since the previous Modern Slavery Statement, **Volcafe BU** has significantly strengthened management of modern slavery risks in its green coffee supply chains by harmonising its human rights due diligence processes across its operations. Mapping of supply-chain risks has improved through more systematic country-level risk assessments using recognised external data sources, greater use of supply-chain-specific information gathered through supplier onboarding and supplier risk assessment questionnaires and combining these with existing internal inspections, and 3rd party certification audits. Volcafe has also enhanced traceability and data quality across key supply chains by integrating digital tools, including Meridia, which support improved visibility of farm-level data and help identify data quality issues as they pertain to geolocation data or elevated deforestation and legality risks requiring further assessment. Together, these developments have increased Volcafe's ability to prioritise risks of forced labour and modern slavery in particular geographies and to target mitigation and engagement activities more effectively.

To strengthen **Sugar BU's** understanding of supply chain risks and improve visibility across our supplier base, we maintain an internally developed Supplier Database and a country-level Supplier Risk Mapping tool. These tools enable us to consolidate supplier information, map supply chain relationships, and assess risk exposure across sourcing regions. To support a more comprehensive evaluation of potential human rights and modern slavery risks, we supplement internally collected supplier data with external risk intelligence, including the Fairtrade Risk Map and the CSR Risk Check Tool. This combined approach enhances our ability to identify higher-risk suppliers, countries, and commodities, and supports the ongoing development of our supply chain mapping and due diligence processes.

MLP BU has made no changes to the Human Rights Impact Assessment (HRIA) in place at the time of the last Modern Slavery Statement. The HRIA is a structured due diligence tool designed to identify and evaluate potential human rights risks within business activities and supply chains. Its goal is to support the prioritisation of risk areas and inform where management systems or further actions may be appropriate. The assessment considers issues including forced labour, child labour, freedom of association, health and safety, working conditions, discrimination, land rights, food security, and access to water and sanitation. It measures both the initial or inherent level of potential risk and the remaining level of risk after considering existing policies, procedures and processes, responsibilities and resources, and monitoring arrangements.

1.6 Plans to further improve knowledge and mapping of supply chains

Volcafe BU recognises that supply-chain mapping and risk understanding are ongoing processes and plans to continue strengthening its approach. Future priorities include expanding enhanced traceability and data-validation tools across additional supply chains, refining risk assessments by expanding the use of external data sources, combining external risk indicators with internal evidence from audits, grievance mechanisms, and field-level engagement, and deepening engagement with suppliers. Volcafe also plans to strengthen training for internal teams and suppliers on labour-related risks, including forced labour, and to further align its human rights due diligence processes with evolving regulatory and best-practice expectations. Thirdly, Volcafe is working to strengthen the links between the Group's international Grievance Mechanism (SpeakUp) and the localised Grievance Mechanisms that many Volcafe origin entities operate. These steps are intended to support continuous improvement in Volcafe's understanding of modern slavery risks across its operations and supply chains and to inform proportionate prevention and mitigation measures.

At Group level, we are planning to establish a Sustainability Technical Committee supported by four Technical Working Groups (TWGs). Two of these groups—the Improving Lives TWG and the Responsible Sourcing TWG—will play a key role in strengthening our approach to human rights due diligence and risk assessment by promoting alignment, consistency and the sharing of best practices across business units. Another two TWG—Energy and Emissions and Safeguarding Nature—focus on addressing environmental challenges in our own operations and in the supply chain.

The TWGs will support the continued development of our approach to forced labour, child labour, other forms of labour exploitation and social injustice. Building on the requirements already set out in our Supplier Code of Conduct, the TWGs will further develop the relevant content and professionalise the methodologies used to identify, assess and address these issues across our global supply chain. Any additional expectations or requirements arising from this work will, where appropriate, be reflected in future updates to the Supplier Code of Conduct.

2. Our policy statement

2.1 Operating policies and international standards

Our company recognises that there are heightened modern slavery risks associated with sourcing products from countries where labour standards and governance frameworks may be less developed. In response, we have established a set of policies that define clear, non-negotiable requirements for our own operations and set expectations for our business partners. These policies form part of our broader approach to identifying, assessing and managing modern slavery risks within our supply chains.

- Standards of Business Conduct apply across all ED&F Man companies and outline the principles that guide employee conduct. The standards reflect ED&F Man's values and provide guidance on ethical decision-making. It addresses topics including human rights, labour standards and modern slavery. The policy states that ED&F Man has a zero-tolerance for modern slavery or human trafficking and references internationally recognised frameworks such as the Universal Declaration of Human Rights and the International Covenant on Economic, Social and Cultural Rights.
- Responsible Sourcing Policy and Supplier Expectations set out the principles and standards applicable to ED&F Man's suppliers. The policy requires suppliers to comply with internationally recognised standards, including the UN Universal Declaration of Human Rights, ILO core labour standards and conventions, and, where relevant, the OECD Guidelines for Multinational Enterprises. It outlines expectations related to human rights and labour practices, including modern slavery.
- Supplier Code of Conduct, which forms part of the Responsible Sourcing Policy and Supplier Expectations, requires suppliers to commit to the principles set out in the code within their own operations and, where relevant, across their supply chains. The code sets expectations that suppliers are not involved in, contribute to, or are associated with human rights abuses, including modern slavery and human trafficking, and that employment is freely chosen, without the use of forced, bonded, indentured or involuntary labour.

In addition to ED&F Man's own policies, the Group aligns with the policies of its parent company, Hartree Partners, LP.

- Hartree Partners Code of Conduct sets out its commitment to addressing and combating modern slavery.
- Hartree Supplier Code of Conduct encourages suppliers to comply with applicable anti-slavery and human trafficking laws and regulations, including the UK Modern Slavery Act 2015.

2.2 Stakeholder engagement and communication

The development and implementation of our responsible sourcing policies and procedures involve collaboration across a range of internal and external stakeholders. Internally, policy development is led by Group Sustainability team in consultation with business unit leadership, commercial and operational teams, Legal and Compliance functions, and senior management. This approach helps ensure that our policies reflect the realities of our operations and supply chains and are aligned with applicable regulatory requirements.

Our understanding of modern slavery risks is further informed by engagement with external organisations and subject matter experts, including Partner Africa, FoodChain ID, and LRQA, as well as participation in industry initiatives and responsible sourcing programmes. Through these engagements, we gain insights into emerging human rights risks, sector-specific challenges, and good practice approaches to due diligence and remediation. Lessons learned are used to inform the ongoing review and enhancement of our responsible sourcing policies, procedures, and risk management frameworks.

ED&F Man communicates internal policies to employees through the company intranet, where policies are centrally stored and updated. Employees are required to review and acknowledge receipt of relevant policies, and the system tracks completion rates. Automated reminders are issued where acknowledgements are not completed within a defined timeframe.

Policies applicable to external parties, such as the Supplier Code of Conduct, are shared with all suppliers as part of their onboarding process. Commodities suppliers are required to review, sign and comply with these requirements. Key policies are also publicly available on the ED&F Man website. Commodities suppliers are expected to promote these principles within their own supply chains and to take reasonable steps to ensure that their suppliers comply with the principles of our Responsible Sourcing Policy.

2.3 Supplier's policies

Given the scale and diversity of our supplier base, we do not routinely conduct detailed assessments of individual supplier policies across all suppliers. Instead, we apply a risk-based approach, using due diligence, supplier assessments, adverse media screening, and supply chain risk mapping to identify higher-risk suppliers, regions, or commodities. Where elevated modern slavery risks are identified, we may undertake enhanced due diligence, including a more detailed review of suppliers' policies, management systems, and risk mitigation measures.

2.4 Policy improvements

In 2025, ED&F Man conducted a comprehensive review of the Responsible Sourcing Policy and Supplier Expectations and the Supplier Code of Conduct. The review was carried out in consultation with all business units and approved by the ED&F Man Commodities Executive Management Committee.

3. Risk management

ED&F Man seeks to promote fair labour practices within its supply chain.

Volcafe BU assesses risks related to modern slavery and forced labour through its Human Rights and Environmental Due Diligence framework. Forced labour has been identified as a material and priority risk, reflecting structural vulnerabilities within green coffee supply chains, including the prevalence of informal labour arrangements. Risk assessments are reviewed and updated on an ongoing basis and are informed by country-level risk analysis, supplier engagement, audits and assessments, grievance mechanisms, and supply chain-specific information. Oversight of this process sits with Volcafe's Global Sustainability team, working closely with sustainability, commercial, and operational colleagues in origin countries, where field teams provide contextual insight and support implementation. Volcafe also collaborates with specialist organisations, including Partner Africa and LRQA, to strengthen its due diligence methodology and support risk identification and prioritisation.

Exposure to modern slavery risks within coffee supply chains can vary by geography and supply chain structure, particularly where smallholder farming, informal labour arrangements, and limited infrastructure are prevalent. In certain producing regions of Latin America, the use of seasonal and migrant labour, often engaged through informal or short-term arrangements and in remote locations, may increase vulnerability to indicators associated with forced labour, such as restrictions on movement, or dependency on employers for housing. In parts of Africa, including East Africa, structural challenges such as limited access to education and basic services may contribute to an elevated risk of child labour on smallholder farms, particularly within family-based production systems. Additionally, indigenous and marginalised communities in some regions of Latin America and Asia may face heightened vulnerability due to socio-economic factors, which can increase the risk of both child labour and forms of labour exploitation. These risks are context-specific and do not necessarily reflect widespread or systematic practices, but rather areas where enhanced due diligence and targeted mitigation measures may be required.

MLP BU has conducted detailed Human Rights Impact Assessments (HRIAs) for a number of, though not all, origin countries from which it sources molasses. These assessments consider a range of social issues across the value chain, including risks related to forced labour and child labour.

The Sustainability team works with suppliers in relevant regions to carry out these assessments, and the MAS Program is used to support sustainable sourcing initiatives and invest in projects aimed at addressing medium and higher-risk issues identified through the HRIA process.

Sugar BU undertakes risk assessments across its supply chains to identify and understand the relative risks of modern slavery and related human rights issues. The assessment process is supported by an internally developed Supplier Database and a country-level Supplier Risk Mapping tool, which consolidate supplier information and enable the evaluation of risk across suppliers and supply chains. To provide a comprehensive view of risk, internal supplier questionnaire data is supplemented with external risk intelligence, including the Fairtrade Risk Map and the CSR Risk Check Tool, alongside internal counterparty risk controls, adverse media screening, reviews of relevant third-party certifications, and other due diligence information.

Risk assessments consider actual and potential risks arising across the supply chain, informed by the key topics set out in the Responsible Sourcing Policy. This process is led by

HSEQ and Sustainability teams, and the tools and outcomes are reviewed periodically to support ongoing monitoring and follow-up actions where appropriate.

For the **Sugar** and **MLP BUs**, the most significant modern slavery risks arise within sugar cane supply chains. Key risks relate to the potential use of child labour and, in certain geographies, forced labour associated with vulnerable and migrant workers. Child labour risks are most prevalent at farm level and may be driven by a range of underlying factors, including poverty, limited access to childcare, barriers to education, and the involvement of family members in agricultural work. In some cases, migrant workers may bring young children to the fields due to a lack of safety at home, a lack of childcare options or withdraw school-age children from education to support household income.

A Human Rights Impact Assessment (HRIA) conducted across seven Latin American countries identified a medium risk of forced labour in Guatemala, the Dominican Republic, Mexico, and Belize, and a medium risk of child labour in those countries as well as El Salvador and Nicaragua. During 2025, ED&F Man Liquid Products UK Limited sourced sugar cane-derived products from Mexico and El Salvador, among other origins. ED&F Man Sugar Limited did not source from countries included within the scope of the HRIA during the reporting period. While these findings do not indicate the presence of modern slavery within ED&F Man's supply chains, they inform the prioritisation of due diligence and risk mitigation activities within higher-risk sourcing regions.

4. Due Diligence Process

4.1 Due Diligence Framework and Governance

ED&F Man applies a risk-based due diligence approach to identify, prevent, mitigate, and address modern slavery risks within its operations and supply chains. Our approach combines corporate governance processes, supplier due diligence, risk assessment tools, supplier engagement, grievance mechanisms, and participation in industry initiatives. These measures are designed to support compliance with applicable legislation, strengthen supply chain transparency, and promote respect for human rights across our business activities.

At **Group level**, all commercial counterparties undergo due diligence through our internal **Know Your Counterparty (KYC)** onboarding and risk assessment platform. The system supports the assessment of counterparties prior to engagement, including reviews of beneficial ownership, sanctions exposure, financial standing, and other relevant risk indicators. Counterparties are approved only after completion of the required due diligence checks and are subject to periodic review. These processes, together with ongoing monitoring through **adverse media screening tools**, support the identification and management of potential human rights and modern slavery risks within our supply chains.

In addition, product suppliers, transport providers, and storage providers are evaluated through a **supplier assessment process** managed by the Quality and Sustainability teams. This includes a structured questionnaire covering quality, safety, corporate social responsibility, and sustainability topics. Commodities suppliers are required to sign and comply with the Supplier Code of Conduct and are subject to periodic reassessment based on risk. These processes support the identification and management of potential human rights and modern slavery risks within our supply chains. We are exploring ways to incorporate non-commodity suppliers into our supplier assessment process based on their risk profiles.

We **audit** a small percentage of our suppliers on an annual basis, using internal resources. While all our suppliers have agreed to unannounced audits by signing our Supplier Code of Conduct, it is typically not practical for us to perform unannounced audits of our suppliers due to complicated logistics. Our internal audits consist of a detailed inspection of the manufacturing facility, visits to any worker accommodations, and inspections of field conditions where harvesting occurs. Additionally, some of our suppliers maintain 3rd party sustainability certifications, which cover modern slavery, but this is not applicable to all our suppliers.

Volcafe's BU approach to preventing and addressing modern slavery is embedded within its Human Rights Due Diligence (HRDD) and Human Rights and Environmental Due Diligence (HREDD) framework, which applies across its operations and global green coffee supply chains. Aligned with internationally recognised standards, including the UN Universal Declaration of Human Rights and ILO core conventions, the framework adopts a zero-tolerance approach to forced labour, which has been identified as a material human rights risk.

Responsibility for implementing the framework sits with the Global Sustainability team, working closely with commercial and operational teams in origin countries. Volcafe follows a risk-based approach consistent with OECD guidance, encompassing risk identification, assessment, prevention, mitigation, monitoring, and remediation. These processes are supported by training for staff, suppliers, and farmers, as well as global and local grievance mechanisms that enable concerns to be raised safely and inform ongoing risk management

activities.

4.2 Supplier Engagement and Preventive Actions

Volcafe BU engages directly with suppliers, workers, and external organisations to develop and implement actions to prevent modern slavery and minimise forced labour risks, going beyond contractual requirements set out in codes of conduct. Through its origin-level field teams and technicians, Volcafe works closely with suppliers and farmers to raise awareness of labour rights, responsible recruitment and employment practices, and early warning signs of labour exploitation, and to support the practical implementation of preventive measures. Volcafe collaborates with specialist organisations such as Partner Africa and LRQA to strengthen its human rights due diligence approach, drawing on their technical expertise and experience working directly with workers, communities, and rights holders in agricultural supply chains. These partnerships inform Volcafe's understanding of risk drivers, support capacity-building, and contribute to the design of context-appropriate actions that reflect local realities and lived experience. Insights from Volcafe's child labour approach, which emphasises root-cause analysis, prevention, and collaboration with local stakeholders, further reinforce the integration of worker-centred perspectives into actions to address modern slavery risks across its supply chains.

The **MLP BU** continues to engage with supplier partners through it's MAS Program's Advisory Committee. Projects were implemented during this reporting period in Guatemala, an origin with a medium risk of child labor, to expand school hours at a local school near one of our key supplier sites which reduces the likelihood of child labor in the region.

Within the **Sugar BU**, a range of initiatives is being advanced, including structured stakeholder engagements, collaborative supplier projects such as school renovation, sugarcane farm visits, and involvement in the Sugar Collaboration Group to enhance supply chain mapping and risk identification. Additionally, the Sugar BU employs an internally developed risk assessment tool that integrates external and internal data at the supplier country level to mitigate modern-slavery risks.

4.3 Grievance and Remediation Mechanism

At **Group level**, ED&F Man has implemented Speak Up, an online grievance reporting tool, as part of its approach to fostering a culture of openness and accountability, in which employees and other stakeholders are encouraged to raise concerns. We encourage all employees and suppliers to report any concerns or suspicions of modern slavery, forced labour, or human trafficking to us. Speaking up (often referred to as whistleblowing) involves reporting conduct that may be illegal, contrary to internal policies, regulations or procedures, or that could pose a risk to service users, members of the public or colleagues.

Reports can be submitted anonymously through a secure portal that is available in multiple languages, 24 hours a day, seven days a week. ED&F Man has a Whistleblowing Policy in place that sets out protections against retaliation for individuals who raise concerns in good faith. Further information on whistleblowing arrangements and responsibilities is available in the Whistleblowing Policy.

Main points of contact for internal and external concerns:

- mlro.csr@edfman.com: money laundering, central investigating officer
- csr@edfman.com: corporate social responsibility issues

In addition to the above, **Volcafe** has established global and local grievance mechanisms

designed to be transparent and accessible, enabling workers, farmers, and other stakeholders to raise concerns related to forced labour safely and without fear of retaliation. Insights from grievances contribute to ongoing refinement of risk assessments and support the continuous improvement of Volcafe's due diligence approach. Based on this process, forced labour has been identified as the highest-priority modern slavery risk within Volcafe's supply chains, particularly at farm level in the coffee sector, where informal labour arrangements are more common and agricultural workers—including seasonal and migrant workers—may face heightened vulnerability.

4.4 Remediation policies and processes

Volcafe's approach to remediation is embedded within its Human Rights Due Diligence (HRDD) and Human Rights and Environmental Due Diligence (HREDD) framework, which recognises forced labour as a material risk within green coffee supply chains and applies a **strict zero-tolerance policy** to any form of forced labour. Remediation is approached as part of a broader prevention-focused due diligence process, aligned with international human rights standards and OECD guidance, and is activated where risks or potential violations are identified. Collected through **global and local grievance mechanisms**, concerns relating to forced labour are assessed through defined case-management procedures, with escalation where appropriate. Where risks or cases are identified, Volcafe focuses on proportionate and context-appropriate responses, including engagement with suppliers, targeted training and awareness-raising, and the development of corrective actions aimed at addressing root causes rather than punitive disengagement. In parallel, Volcafe is **mapping and strengthening referral and support mechanisms** in countries where forced labour risks have been identified, to ensure credible pathways exist for managing and responding to cases in collaboration with relevant local actors. Insights from grievance mechanisms, training, and partner engagement feed back into Volcafe's risk assessment and continuous improvement processes, supporting the ongoing strengthening of remediation capacity across its operations and supply chains.

To further strengthen its responsible sourcing framework, the **Sugar BU** is developing and implementing an Escalation and Remediation Procedure. The procedure is intended to complement existing responsible sourcing requirements. It will provide clear guidance on roles, responsibilities, decision-making, corrective actions, and remediation pathways, helping to ensure that concerns identified through due diligence activities, supplier engagement, audits, or grievance mechanisms are addressed consistently and effectively. The procedure will support the continued enhancement of the Sugar BU's due diligence framework and its approach to managing human rights risks within its supply chains.

Remediation may include repayment of recruitment fees, restoration of wages, access to support services, supplier corrective action plans, referral to specialist organisations, or other measures designed to restore affected individuals to the position they would have been in had the harm not occurred.

MLP BU intends to adopt the Sugar BU Escalation and Remediation Procedure once it has been finalised.

4.5 Incidents of modern slavery

In 2025, ED&F Man did not record any confirmed incidents of modern slavery within its own operations, and no specific allegations or substantiated concerns were identified through its monitoring and due-diligence processes in relation to its supply chains. While this outcome reflects the information available at the time, the company recognises the complexity of

global supply chains and continues to treat modern slavery risk management as an ongoing priority.

We maintain **a zero-tolerance approach** to forced labour, child labour, and other forms of modern slavery. Where credible evidence of such practices is identified within our supply chains, we take appropriate action in accordance with our due diligence and responsible sourcing procedures. This may include engagement with the supplier to address identified issues, the implementation of corrective action plans, or, where remediation is not possible or sufficient progress is not demonstrated, the termination of the business relationship. We have previously ceased engagement with supply chain partners where labour rights violations have been identified.

4.6 Business model

Volcafe BU has considered the potential links between its business model, commercial practices, and modern slavery risks through its Human Rights Due Diligence (HRDD) and Human Rights and Environmental Due Diligence (HREDD) framework, including its most recent risk assessment, which identified forced labour as a material and priority risk within green coffee supply chains. This assessment explicitly recognised that structural characteristics of agricultural commodity supply chains—including price volatility, informal labour arrangements, and productivity pressures at farm level—can increase the risk of adverse human rights impacts if not appropriately managed. As a result, Volcafe has examined how business-related drivers such as sourcing practices, supplier requirements, and operational targets may influence labour conditions in its supply chains and has embedded safeguards within its due diligence processes to mitigate these risks. These include prioritising risk-based engagement, integrating labour-risk considerations into sourcing and supplier management decisions, strengthening training and awareness-raising rather than relying solely on contractual compliance, and using grievance mechanisms and continuous review processes to identify unintended impacts. This ongoing assessment ensures that performance expectations and business decisions are reviewed through a human-rights lens, supporting alignment between commercial objectives and Volcafe's commitment to preventing forced labour and modern slavery

The **Sugar** and **MLP BUs** participate in global sugar cane supply chains through the sourcing, trading, and distribution of sugar and sugar cane-derived products. These supply chains involve agricultural production, harvesting, processing, transportation, and export activities across multiple sourcing regions.

The most significant human rights risks arise at farm level, where labour-intensive activities may involve seasonal, temporary, and migrant workers. As traders rather than primary producers, the Sugar and MLP BUs do not own or operate farms or mills. Instead, they source products from a range of suppliers, including producers, processors, exporters, and other traders. As a result, the business units focus their efforts on responsible sourcing, supplier due diligence, risk assessment, and stakeholder engagement to identify and address potential human rights and modern slavery risks within their supply chains.

4.7 Stakeholder engagement and collaborations

Volcafe BU participates in a range of peer learning and collaborative initiatives to share lessons learned, strengthen best practice, and contribute to collective action on preventing modern slavery and related labour risks in the coffee sector. Volcafe is actively engaged in the **sustainability and due diligence committees of the European Coffee Federation (ECF)**, which provide a forum for coffee industry actors to exchange experience, discuss

regulatory developments, and align approaches to human rights due diligence and responsible sourcing, including forced labour risks. Volcafe also participates in the **Global Coffee Platform (GCP)**, engaging in multi-stakeholder dialogue aimed at advancing sustainability, improving working conditions, and addressing systemic labour challenges in coffee-producing regions through shared learning and coordination across the sector. In addition, Volcafe is a member of the **International Labour Organization's Child Labour Platform (ILO CLP)**, a leading peer-learning and collaboration initiative that brings together companies, governments, international organisations, and civil society to share best practice and develop effective approaches to addressing child labour and related labour risks in supply chains.

The **Sugar** and **MLP BUs** recognise the importance of stakeholder engagement and collaboration in identifying and addressing human rights and modern slavery risks within supply chains. Engagement with suppliers, industry initiatives, certification bodies, and specialist external organisations supports the ongoing development of responsible sourcing practices and strengthens the understanding of risks within sugar cane supply chains. Within the Sugar BU, participation in the **Sugar Collaboration Group** supports supply chain mapping and the identification of sustainability and human rights risks across the sugar sector. The business unit also works with **FoodChain ID** to assess deforestation risks within Brazilian sugar supply chains and uses information from external risk assessment tools and certification schemes, including **Bonsucro**, to support due diligence activities. Within MLP, the business unit also engages with suppliers through **its MAS Program Advisory Committee**, which supports collaboration on responsible sourcing initiatives and community-based projects designed to address underlying social risks in sourcing regions.

Both Sugar and MLP engage directly with suppliers through questionnaires, responsible sourcing requirements, and ongoing dialogue, helping to promote awareness of human rights expectations and support continuous improvement across their supply chains.

4.8 Monitoring, incidents and continuous improvement

Since the previous Modern Slavery Statement, **Volcafe BU** has strengthened and formalised its approach to identifying and addressing modern slavery risks, particularly forced labour, across its operations and green coffee supply chains. Volcafe identified forced labour as a **material and priority human rights risk**, recognising the structural vulnerabilities present in agricultural supply chains, such as informal labour arrangements. This has led to clearer articulation of forced labour risks within Volcafe's Human Rights framework, and deeper integration of modern slavery considerations into its Human Rights Due Diligence (HRDD) and Human Rights and Environmental Due Diligence (HREDD) processes. Volcafe has expanded origin-level engagement, strengthened training and awareness-raising for staff, suppliers, and farmers, enhanced grievance mechanisms, and progressed the mapping of referral and support pathways to ensure appropriate responses where risks or cases are identified.

Looking ahead, Volcafe plans to **continue strengthening its due diligence approach** by further embedding modern slavery considerations into sourcing and supplier management practices, expanding and harmonising forced labour training across origins as part of a continuous improvement approach, and deepening origin-level engagement to improve early identification and prevention of risks. Volcafe will also continue to refine its grievance and referral mechanisms to ensure they remain accessible and effective, and to strengthen collaboration with specialist organisations and peer initiatives to inform best practice. These actions form part of Volcafe's ongoing HREDD roadmap and reflect a commitment to continuous improvement in line with evolving regulatory expectations and UK and Australia Modern Slavery Act requirements.

The **Sugar** and **MLP BUs** monitor modern slavery and broader human rights risks through ongoing supplier engagement, risk assessments, supplier questionnaires, country risk mapping, adverse media screening, and reviews of relevant certifications and responsible sourcing requirements. Findings from these activities are used to refine risk assessments, strengthen supplier due diligence processes, and inform responsible sourcing priorities.
No confirmed incidents of modern slavery were identified within the Sugar and MLP business units' own operations during the reporting period. However, recognising the inherent risks associated with global agricultural supply chains, both business units continue to strengthen their due diligence frameworks and monitoring processes. During the reporting period, this included further development of responsible sourcing procedures, enhanced supplier risk assessment methodologies, and the development of an Escalation and Remediation Procedure within the Sugar BU, which MLP intends to adopt once finalised. These actions support a process of continuous improvement and strengthen the business units' ability to identify, assess, and address potential modern slavery risks within their supply chains.

5. Training

ED&F Man recognises that training and capacity building are important components of its approach to identifying, preventing, and addressing modern slavery risks. Training programmes are designed to raise awareness of human rights and labour-related risks, strengthen understanding of responsible sourcing expectations, and support the effective implementation of due diligence processes across the Group's operations and supply chains.

Training is delivered to employees whose roles involve supplier engagement, sourcing, trading, sustainability, compliance, quality management, and operational oversight. In addition, targeted awareness-raising and capacity-building activities are undertaken with suppliers, farmers, and other supply chain participants where relevant. Training content is tailored to the activities of each business unit and may include topics such as modern slavery and forced labour risks, child labour, labour rights, responsible recruitment, grievance mechanisms, supplier expectations, risk identification, and escalation procedures.

Within the **Sugar BU**, responsible sourcing training was delivered during 2024 and 2025 to traders and market researchers who visit supplier mills, production facilities, and agricultural operations. The programme covered responsible sourcing policies and procedures, environmental stewardship, livelihood improvement, governance standards, and the identification of environmental, social, and human rights risks within sugar supply chains. Training supports employees in recognising potential risks and engaging effectively with suppliers on responsible sourcing expectations.

Volcafe BU integrates modern slavery and forced labour awareness into its Human Rights Due Diligence (HRDD) and Human Rights and Environmental Due Diligence (HREDD) programmes. Training and guidance are provided to employees, sourcing teams, suppliers, and farmers, with particular focus on higher-risk sourcing regions. Topics include labour rights, responsible employment practices, indicators of forced labour, grievance mechanisms, and risk escalation processes. Volcafe also delivers capacity-building activities through its responsible sourcing and farmer support programmes, supported by origin-based sustainability and field teams.

Since the previous reporting period, Volcafe has strengthened its training approach by placing greater emphasis on forced labour as a priority human rights risk and by integrating modern slavery considerations more explicitly into supplier engagement and due diligence activities. Looking ahead, Volcafe plans to further harmonise training across origin operations, strengthen supplier- and farmer-facing training programmes, and continue to update training content in response to emerging risks, regulatory developments, and lessons learned through monitoring, grievance mechanisms, and due diligence activities.
ED&F Man will continue to review and enhance its training programmes to ensure that employees and supply chain partners are equipped with the knowledge and tools necessary to identify, assess, and respond to modern slavery risks and to support the ongoing strengthening of the Group's human rights due diligence framework.

The **MLP BU** business unit provides relevant employees with training aligned with the Bonsucro and ISCC frameworks, covering the applicable requirements and standards under each framework.

6. Effectiveness of the actions

6.1 Governance, goals and key performance indicators

ED&F Man monitors a range of sustainability and responsible sourcing Key Performance Indicators (KPIs) that support the identification, prevention, and mitigation of modern slavery and broader human rights risks within its operations and supply chains.

At Group level the ED&F Man Sustainability Committee sets company-wide sustainability goals and KPIs and monitors progress against them. The Committee meets twice a year and reports on progress to executive leadership.

Under the *Improving Lives* pillar of the sustainability strategy, ED&F Man has established a KPI to improve the lives of at least 2,000 people annually through community impact projects across its value chains. Related metric requires on a yearly basis:

- Execution of community projects that impact at least 2000 people on our value chain
- Implementation of at least one project each year focused on supporting living incomes for farmers.

While these KPIs are not solely focused on modern slavery, they contribute to addressing some of the underlying drivers of vulnerability and exploitation by supporting livelihoods and strengthening community resilience.

Under the *Responsible Sourcing* pillar, ED&F Man tracks progress in:

- Increasing the proportion of responsibly sourced products and the number of suppliers that have acknowledged and signed the Supplier Code of Conduct.
- Assessing environmental, social, and governance (ESG) risks within supply chains through the development and implementation of responsible sourcing procedures, risk assessment methodologies, mitigation strategies, and reporting systems.

Together, these KPIs provide a framework for monitoring progress, strengthening due diligence processes, and supporting the ongoing management of modern slavery and human rights risks across the business.

Within **Volcafe BU**, responsibility for establishing and monitoring goals and KPIs related to modern slavery and forced labour sits with the Global Sustainability function. Progress is monitored through Volcafe's Human Rights Due Diligence (HRDD), Human Rights and Environmental Due Diligence (HREDD), and Monitoring, Evaluation and Learning (MEL) frameworks, which support ongoing review of risk identification, supplier engagement, grievance mechanisms, training activities, and remediation processes.

6.2 Measuring Effectiveness

ED&F Man assess the effectiveness of their modern slavery programmes through a combination of quantitative and qualitative information gathered through due diligence, supplier engagement, grievance mechanisms, training activities, audits, risk assessments, and ongoing monitoring.

At Volcafe BU quantitative data is used to monitor coverage, implementation and progress against agreed indicators, including supplier onboarding, Supplier Code of Conduct acceptance, training participation, risk assessment coverage, use of grievance mechanisms and follow-up or remediation actions.

Qualitative data provides deeper insight into risk drivers, implementation challenges and outcomes through supplier and partner engagement, internal and independent reviews, certification and verification processes, grievance analysis, and feedback from internal teams and external stakeholders.

Findings are reviewed through established governance processes and are used to inform risk prioritisation, supplier engagement strategies, training programmes, due diligence procedures, and future objectives. This approach supports continuous improvement and helps ensure that resources are directed towards the areas of highest potential risk.

6.3 Outcomes achieved during the reporting period

During the reporting period, **Volcafe BU** continued to strengthen its approach to identifying, assessing, and addressing modern slavery risks across its operations and supply chains.

Key outcomes included:

- Improved identification and prioritisation of modern slavery and forced labour risks through enhanced risk assessment methodologies, supplier due diligence processes, and supply chain mapping activities.
- Greater integration of human rights and modern slavery considerations into business processes, including responsible sourcing programmes and Volcafe's HRDD and HREDD frameworks.
- Enhanced traceability and data quality across priority supply chains, supporting more effective risk identification and decision-making.
- Expanded training, awareness-raising, and engagement activities for employees, suppliers, farmers, and other supply chain participants.
- Strengthened grievance mechanisms, escalation procedures, and remediation pathways to support the management of potential human rights concerns.
- Continued development of responsible sourcing procedures, supplier expectations, and governance processes across the Group.

These improvements have strengthened Volcafe's understanding of modern slavery risks and enhanced its capacity to identify, prevent, mitigate, and respond to potential adverse human rights impacts within its operations and supply chains.

During the reporting period, the **Sugar** and **MLP BUs** continued to strengthen their approach to identifying and managing modern slavery and broader human rights risks within sugar cane supply chains. Key outcomes included the further development and implementation of responsible sourcing procedures, enhanced supplier due diligence processes, and improved risk identification through supplier questionnaires, country risk mapping, adverse media screening, and the use of external risk assessment tools.

The Sugar and MLP BUs also increased internal awareness and capability through responsible sourcing training for employees engaged in supplier-facing activities. In addition, progress was made in strengthening governance and remediation processes, including the development of an Escalation and Remediation Procedure within the Sugar BU and plans to extend this approach to MLP. These actions have improved visibility of supply chain risks, strengthened risk management processes, and provided a more robust foundation for ongoing human rights due diligence and continuous improvement across the Sugar and MLP supply chains.

6.4 Continuous improvement and future priorities

While no confirmed incidents of modern slavery were identified within ED&F Man's own operations during the reporting period, we recognise that modern slavery risks remain complex, evolving, and often deeply embedded within global agricultural supply chains. We therefore remain committed to continuously improving our understanding of supply chain risks and strengthening our human rights due diligence processes.

Future priorities include enhancing supply chain transparency and traceability, improving risk assessment methodologies, strengthening supplier engagement and remediation processes, expanding training and awareness-raising activities, and further integrating human rights considerations into sourcing and business decision-making. **Volcafe BU** will continue to implement its HREDD roadmap, including strengthening forced labour risk assessments, harmonising training programmes across origin operations, enhancing grievance and referral mechanisms, and improving the use of monitoring and evaluation data to support risk prioritisation and decision-making.

Through these actions, Volcafe seeks to further professionalise its approach to human rights due diligence and build a more robust, evidence-based framework for identifying, preventing, mitigating, and addressing modern slavery risks across its global operations and supply chains.

6.5 Supporting resilient communities

ED&F Man recognises that poverty, limited access to education, inadequate healthcare, and insecure livelihoods can contribute to the conditions in which modern slavery and other human rights abuses may occur. Through the *Improving Lives* pillar of its Sustainability Strategy, **the Group** seeks to address some of these underlying vulnerabilities by supporting social and economic development within communities connected to its value chains.

During the reporting period, **Volcafe BU** provided training and advisory support to approximately 125,000 coffee farmers across 11 countries and was recognised in Uganda as the Best Company in the Elimination of Child Labour at the national Employer of the Year Awards. In Honduras, Volcafe partnered with a partner roaster to renovate a healthcare clinic serving coffee-growing communities, improving access to healthcare and clean water for approximately 95,000 people.

During the first part of the reporting period, **MLP BU** supported a community project in Guatemala that funded a school cafeteria, enabling the school to extend its daily opening hours by three hours. Within the **Sugar BU**, a primary school refurbishment project in Eswatini benefited 297 students, while social and environmental initiatives in India supported rural sugar-growing communities. In Kenya, ED&F Man partnered with a local customer to rebuild homes and distribute meals to vulnerable households, benefiting more than 1,000 people.

While these initiatives are not designed specifically as modern slavery interventions, they contribute to addressing some of the social and economic factors that can increase vulnerability to labour exploitation and other human rights risks within agricultural supply chains.

7. Other relevant information

This section is only relevant for Cofi-Com Trading Pty Ltd.

Challenges and Future Outlook
Volcafe BU recognise a number of challenges in responding to modern slavery and related due diligence legislation, reflecting the complexity of agricultural commodity supply chains. Green coffee supply chains are **multi-tiered and geographically dispersed**, often involving large numbers of smallholder farmers and informal labour arrangements, which makes comprehensive supply-chain mapping and consistent data collection inherently challenging. In many producing regions, limited formal employment documentation, reliance on seasonal or migrant labour, and variable local enforcement of labour standards can constrain the availability and reliability of information needed to assess risks at farm level. **Volcafe** has also identified that addressing modern slavery risks requires balancing regulatory expectations with the reality that many risks are **systemic and rooted in broader socio-economic conditions**, which cannot be resolved through contractual controls or disengagement alone. Evolving regulatory frameworks, including increased expectations around documentation, traceability, and demonstrable outcomes, further require continuous adaptation of due diligence processes and internal capacity. In response, Volcafe has adopted a risk-based and continuous improvement approach, strengthening origin-level engagement, training, grievance mechanisms, and referral-pathway mapping, while acknowledging that improving visibility and impact across complex supply chains remains an ongoing challenge under UK and Australia Modern Slavery Act reporting requirements.

Annex — Australian Modern Slavery Act 2018 mandatory criteria

Cofi-Com Trading Pty Ltd

This annex identifies where the mandatory reporting criteria in section 16(1) of the Australian *Modern Slavery Act 2018* are addressed in this Statement.

For Australian reporting purposes, this Statement covers **Cofi-Com Trading Pty Ltd** as the sole Australian reporting entity. Although the Statement is presented as a combined UK and Australian statement, the other reporting entities identified in the Statement are included for UK reporting purposes and are not reporting entities covered by Cofi-Com's Australian statement.

Cofi-Com Trading Pty Ltd did not own or control any entities during the reporting period. Accordingly, references in the mandatory criteria to entities owned or controlled by the reporting entity are not applicable to Cofi-Com.

Table 2 Cofi-Com Mandatory Criteria Mapping

Mandatory criterion	Where addressed in the Statement	Cofi-Com specific explanation
Criterion 1 — Identify the reporting entity	**Pages 5 — "Scope of this Statement"**; pages 3-4 — signatory section.	Cofi-Com Trading Pty Ltd is identified as the Australian reporting entity and as a subsidiary of Volcafe Ltd within the ED&F Man Coffee Business Unit. The approval and signature information for Cofi-Com is set out at the end of this annex and/or in the Statement's approval and signature section.
Criterion 2 — Describe the reporting entity's structure, operations and supply chains	**Page 7 — "Our business" and "Scope of this Statement"**; page 7 — "Legal structure"; pages 10-12 — "Volcafe Business Unit" and Figures 4 and 5; page 13 — "Approach to statement preparation and stakeholder engagement".	Cofi-Com forms part of Volcafe, ED&F Man's Coffee Business Unit. The Statement explains Volcafe's global green-coffee sourcing, processing, logistics and delivery model, including sourcing from farmers, cooperatives, farmer associations, local exporters and other supply-chain partners. Figure 5 on page 12 identifies the countries from which Cofi-Com sourced coffee imported into Australia during 2025. Cofi-Com did not own or control any entities during the reporting period.
Criterion 3 — Describe the risks of modern slavery	**Page 18 — "Risk management"**; page 21 —	The Coffee Business Unit's risk assessment applies

Mandatory criterion	Where addressed in the Statement	Cofi-Com specific explanation
practices in the operations and supply chains of the reporting entity and any entities it owns or controls	"Grievance and Remediation Mechanism"; page 23 — "Business model"; page 24 — "Monitoring, incidents and continuous improvement"; page 30 — "Challenges and Future Outlook"	across Volcafe's operations and global green-coffee supply chains, including the supply chains through which Cofi-Com sources coffee. Forced labour is identified as a material and priority risk. The Statement identifies heightened vulnerability at farm level, particularly where supply chains involve informal, seasonal or migrant labour, remote agricultural work, dependence on employers for housing and limited employment documentation. It also identifies elevated child-labour risks in some smallholder and family-based farming contexts. These risks may vary according to sourcing geography, labour arrangements and supply-chain structure. Cofi-Com has no controlled entities whose risks require separate disclosure.
Criterion 4 — Describe the actions taken to assess and address those risks, including due-diligence and remediation processes	**Pages 12-15 — governance, stakeholder engagement, supply-chain mapping and future mapping priorities**; pages 16-17 — policies and supplier requirements; **pages 20-25 — "Due Diligence Process"**; page 26 — "Training"	Actions applicable to Cofi-Com through the Volcafe and ED&F Man governance frameworks include counterparty and supplier due diligence; supplier onboarding and risk-assessment questionnaires; country and supply-chain risk assessments; adverse-media screening; supplier and farm-level engagement; traceability and data-verification tools; employee, supplier and farmer training; the Supplier Code of Conduct; global and local grievance mechanisms; escalation and case-management arrangements; corrective-action processes; and the development of referral and remediation pathways. The Statement

Mandatory criterion	Where addressed in the Statement	Cofi-Com specific explanation
		explains that remediation responses may include supplier engagement, corrective action, targeted training, repayment of recruitment fees, restoration of wages, access to support services and referral to specialist organisations, depending on the circumstances.
Criterion 5 — Describe how the reporting entity assesses the effectiveness of its actions	**Pages 24–25 — "Monitoring, incidents and continuous improvement"; pages 27–29 — "Effectiveness of the actions"**	Cofi-Com participates in the effectiveness-monitoring arrangements described for Volcafe and the Group. These include monitoring through Volcafe's Human Rights Due Diligence, Human Rights and Environmental Due Diligence, and Monitoring, Evaluation and Learning frameworks. Indicators considered include supplier engagement and Supplier Code of Conduct acceptance, risk-assessment coverage, training implementation, grievance reporting and follow-up, supply-chain mapping and traceability, audits, corrective actions and qualitative feedback from employees, suppliers, external stakeholders and field teams. Findings are reviewed through governance processes and used to revise risk prioritisation, supplier engagement, training, due-diligence processes and future objectives.
Criterion 6 — Describe the process of consultation with entities owned or controlled by the reporting entity and, where applicable, the entity giving a joint statement	**Page 13 — "Approach to statement preparation and stakeholder engagement"**; pages 16–17 — policy-development consultation; page 27 — governance and monitoring	Cofi-Com did not own or control any entities during the reporting period. Consequently, there were no controlled entities with which Cofi-Com was required to consult for the purposes of section

Mandatory criterion	Where addressed in the Statement	Cofi-Com specific explanation
		16(1)(f)(i). This Statement is submitted for Cofi-Com as a single Australian reporting entity and not as a joint statement covering multiple Australian reporting entities; section 16(1)(f)(ii) is therefore not applicable. In preparing the Statement, consultation occurred with sustainability leads from each ED&F Man business unit, including the Coffee Business Unit, and with representatives from relevant finance and legal functions. These stakeholders provided information concerning Cofi-Com's business activities and sourcing origins and the governance, risk-assessment, due-diligence, supplier-engagement, grievance, remediation, training and effectiveness processes applicable to Cofi-Com through Volcafe and ED&F Man. The draft Statement was reviewed through the relevant internal governance process before being submitted to the Cofi-Com Board for approval.
Criterion 7 — Include any other information considered relevant	**Pages 30 — Other relevant information — outcomes, continuous improvement, resilient communities, challenges and future outlook**	Cofi-Com operates within complex, multi-tiered green coffee supply chains involving smallholders and seasonal or migrant labour. These features can limit farm-level visibility and data reliability. Through Volcafe, Cofi-Com applies a risk-based, continuous-improvement approach focused on origin-level engagement, training, grievance mechanisms and referral pathways.

Consultation process

Cofi-Com Trading Pty Ltd had no owned or controlled entities during the reporting period. No controlled-entity consultation was therefore required.

Preparation of the Statement involved consultation across the functions that hold information relevant to Cofi-Com's operations and supply chains. The process included:

- consultation with the Coffee Business Unit and Group sustainability teams regarding risk assessments, human-rights due diligence, supplier engagement, training, grievance mechanisms, remediation and effectiveness monitoring;
- consultation with legal and compliance personnel regarding the Australian mandatory reporting criteria, approval requirements and final submission; and
- review of the completed Statement by Cofi-Com management and the Cofi-Com directors before approval and signature.

The consultation process enabled the functions responsible for implementing the relevant policies and procedures to review the disclosures relating to their areas of responsibility, identify necessary amendments and confirm that the Statement appropriately describes the processes applicable to Cofi-Com.

Principal governing-body approval and signature

This Statement was approved by the board of directors of Cofi-Com Trading Pty Ltd, as its principal governing body, and is signed by the authorised directors on page 4 of this Statement.