

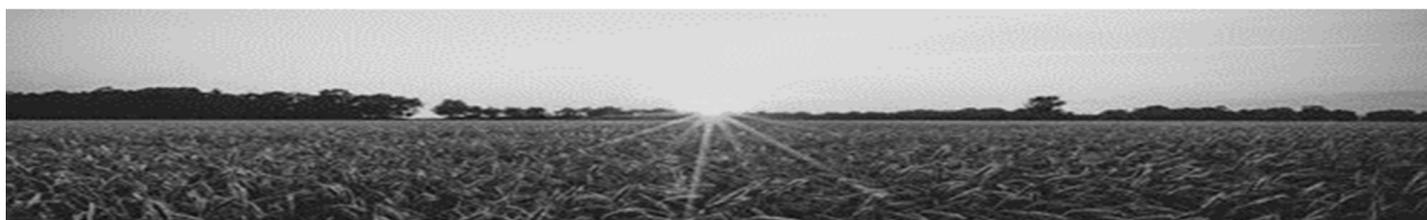


## **MODERN SLAVERY STATEMENT 2021**

**Wilmar Sugar Pte Ltd**

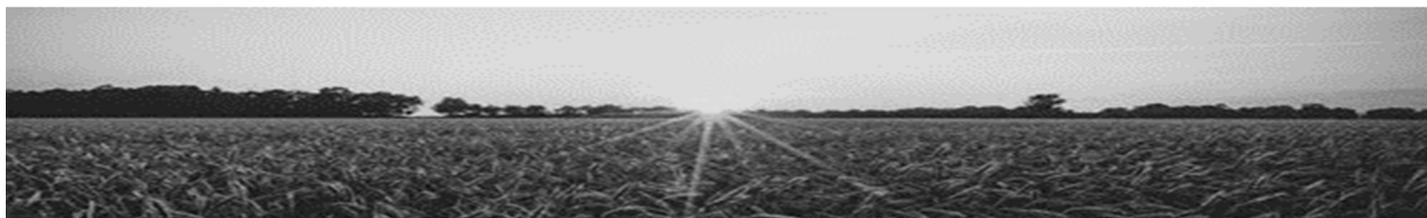
**28 Biopolis Road**

**Singapore 138568**



## Contents

1	Reporting Entity .....	3
2	Our Structure, Operations and Supply Chain.....	4
2.1	Our Structure .....	4
2.2	Our Operations .....	5
2.3	Our Supply Chain .....	6
3	Modern Slavery Framework .....	7
3.1	Manage .....	8
3.2	Identify .....	10
3.3	Mitigate.....	12
3.4	Collaborate.....	12
3.5	Evaluate.....	13
4	Consultation Between Entities .....	13
5	Mandatory Reporting Criteria .....	14



## 1 Reporting Entity

As a large scale, integrated commodity merchandising and supply chain management company, Wilmar Sugar Pte Ltd (WSPL or the “Company”) and its subsidiaries (together the “WSPL Group”, “we”, “us” or “our”) are committed to ensuring that the rights of all people working within the operations and supply chains of the Company are respected according to local, national and ratified international laws.

This is the first Statement by Wilmar Sugar Pte Ltd, which is required to report under the Modern Slavery Act 2018 (the “Act”) and covers the period 1 January 2021 to 31 December 2021. This Statement will describe the structure, operations, supply chain, risks of modern slavery, actions to assess and address those risks and consultation processes for the reporting entity.

Given the global prevalence of modern slavery, we acknowledge that it is not always possible to achieve full transparency and oversight of modern slavery risks within our operations. We recognise that tackling the risk of modern slavery in our supply chains will require our ongoing commitment, dedicated effort and resources, and a willingness to be open and transparent when incidents or concerns relating to modern slavery are identified.

This Modern Slavery Statement has been reviewed and approved by the Board of Wilmar Sugar Pte Ltd on 24 June 2022.

A handwritten signature in blue ink, appearing to be 'Jean-Luc Bohbot', written over a horizontal line.

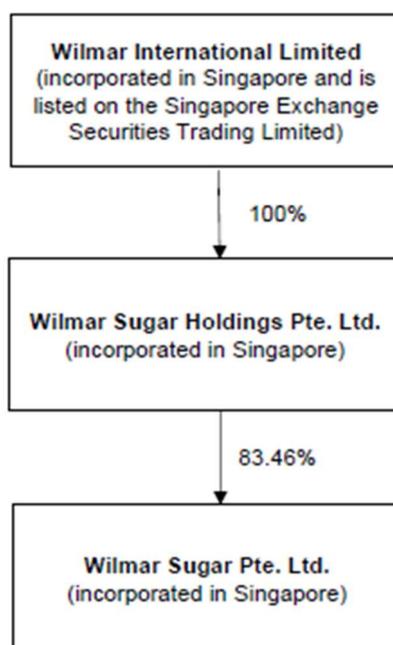
Jean-Luc Bohbot  
*Managing Director*  
Wilmar Sugar Pte Ltd (WSPL)  
24 June 2022



## 2 Our Structure, Operations and Supply Chain

### 2.1 Our Structure

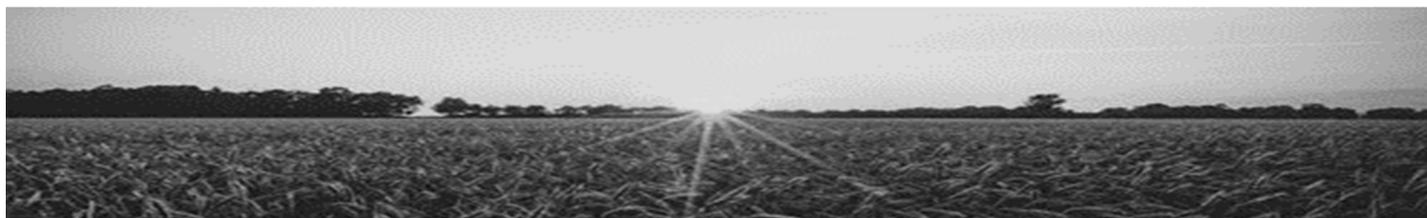
Wilmar Sugar Pte Ltd (“WSPL”) is a private limited liability company incorporated in Singapore and a reporting entity under the Act. WSPL and its subsidiaries employ approximately 90 staff who are based globally. WSPL’s registered office is located at 28 Biopolis Road, Singapore 138568. WSPL is an indirect 83.46% owned subsidiary of Wilmar International Limited<sup>1</sup>, Asia’s leading agribusiness group and a publicly listed company on the Singapore Exchange Securities Trading Limited, under the trading code “F34”. Below is a diagram of the corporate structure of WSPL.



WSPL and its subsidiaries operate domestic trading and origination businesses around the world.

Further information on WSPL and its subsidiaries can be obtained at <https://www.wilmar-international.com/home>.

<sup>1</sup> [www.wilmar-international.com/about-us](http://www.wilmar-international.com/about-us)



## 2.2 Our Operations

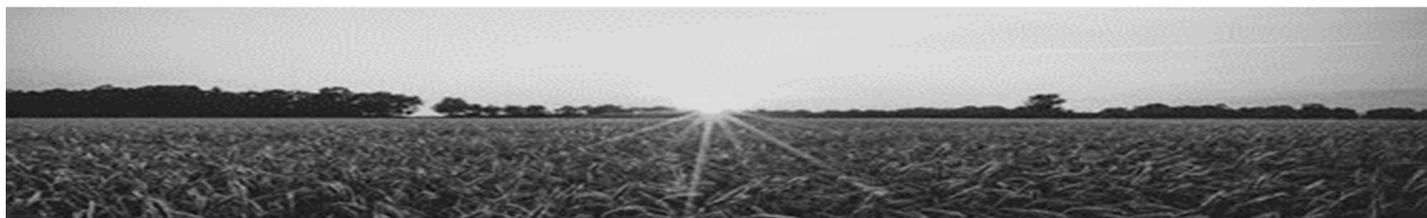
WSPL is a large scale, integrated commodity merchandising and supply chain management company. The principal activities of WSPL are the sourcing, trading, marketing and distribution of agricultural commodities globally, primarily sugar. These activities involve the purchase and sale of various agricultural commodities in either domestic or export markets, and may involve the logistical storage, handling and transport of physical agricultural internationally through WSPL and its subsidiaries. The WSPL Group has offices in Geneva, Sao Paulo, Dubai and Mexico City, with its head office located in Singapore.

WSPL purchases agricultural commodities mainly from suppliers based in Brazil, Australia, India, and Thailand, where the underlying commodity is originated in these countries, representing 76% of total commodity by metric tons purchased in the reporting period.

These agricultural products may be purchased either directly from sugar milling companies, refineries or from other commodity merchandisers and traders. Agricultural commodities purchased from outside Australia and New Zealand are purchased both from these third parties as well as from related companies of our parent, Wilmar International Limited, as this forms part of the vertical integration of the broader Wilmar International Limited group of businesses. For purchases of agricultural commodities in Australia and New Zealand, these will be from both related and non-related suppliers such as sugar milling groups and other agricultural merchandisers or traders.

Regarding logistics and the movement and handling of commodities, WSPL will engage third party providers to provide logistical services, such as road transport, warehousing, product handling and packing and ocean freight in bulk and containers.

Given the nature of agricultural commodity merchandising, WSPL's global procurement will normally involve purchasing from multiple suppliers under spot or forward purchase contracts. These contracts are short term and typically governed by industry specific contract conditions. The contracts are entered into based on a combination of best quality and best price offered by the supplier.

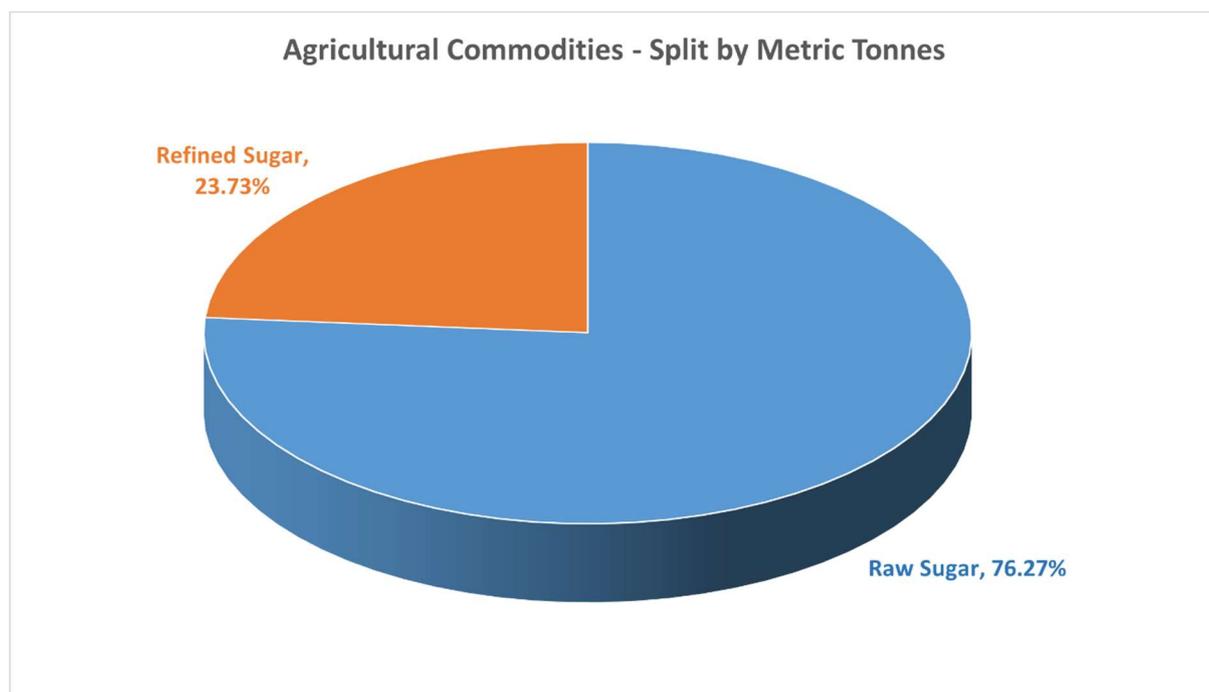


### 2.3 Our Supply Chain

WSPL's supply chain includes the procurement of agricultural commodities, along with logistical services such as storage, transportation and handling of the commodity. The procurement of agricultural commodities is the largest purchase category and makes up more than 90% of total purchases.

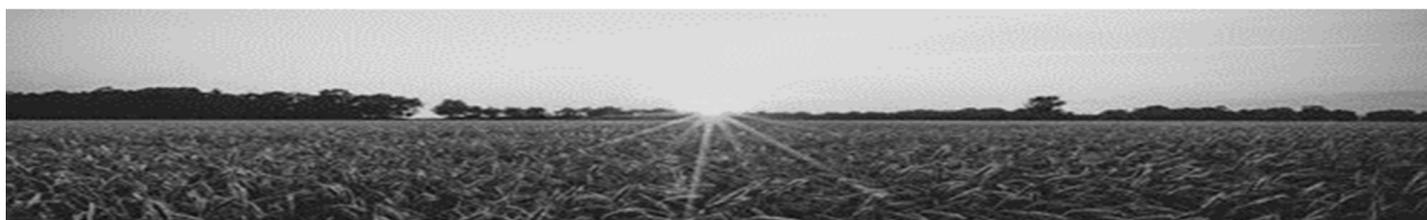
WSPL covers two main agricultural commodities, being:

- Raw sugar; and
- Refined sugar



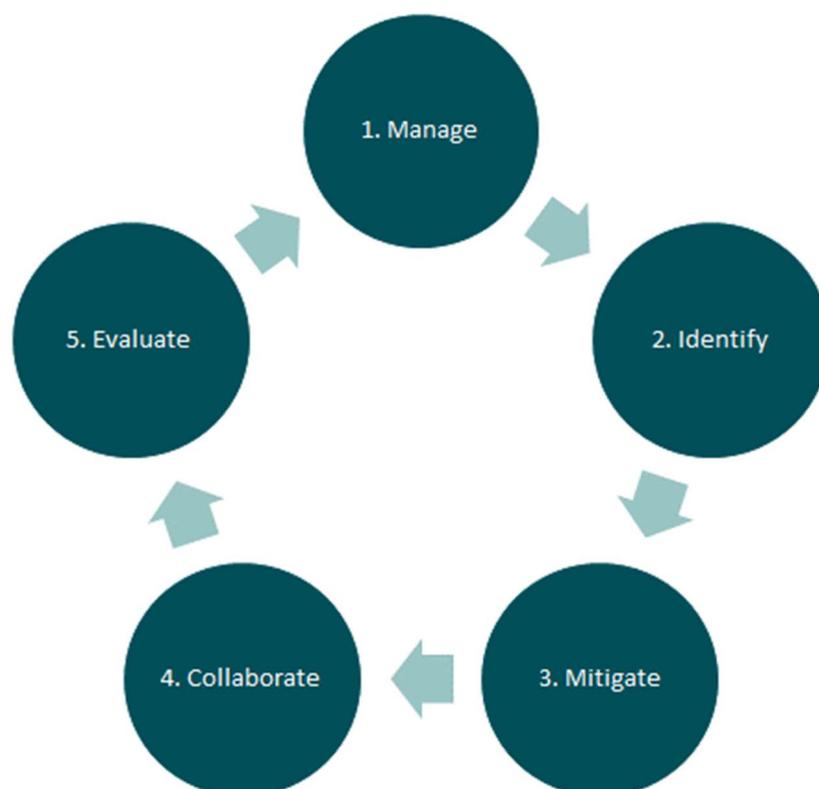
In addition to the procurement of agricultural commodities, WSPL also procures a broad range of logistic services which are primarily sourced outside of Australia and New Zealand. These logistic services include:

- Storage;
- Transportation via road, rail and ocean freight;
- Handling and supervision services, including intake and outturn, packing and analysis of the agricultural commodity;
- Office based support and equipment, including IT hardware and systems, stationery and office cleaning.



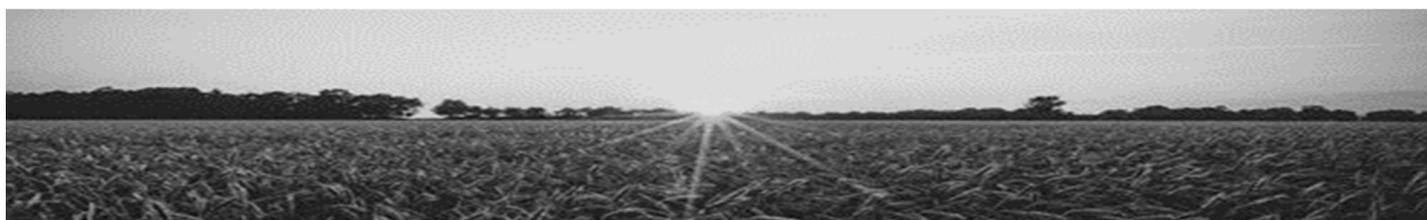
### 3 Modern Slavery Framework

A Modern Slavery Framework has been developed for WSPL. A summary of the approach and development of our Modern Slavery Framework is as follows.



- 1. **Manage** – Policies and procedures
- 2. **Identify** – Operations and supply chain review
- 3. **Mitigate** – Reporting mechanisms both internal and external
- 4. **Collaborate** – Communication, training and engagement
- 5. **Evaluate** – Assessment and review

Each of these steps within our Modern Slavery Framework is discussed below.



### 3.1 Manage

To manage and address the risk of modern slavery within our business operations, the following policies have been introduced and implemented:

- Wilmar Human Rights Policy<sup>2</sup>
- Wilmar Code of Ethical Conduct<sup>3</sup>
- Wilmar No Deforestation, No Peat, No Exploitation (NDPE) Policy<sup>4</sup>
- Wilmar NDPE Sugar Policy<sup>5</sup>

The Wilmar Human Rights Policy sets out WSPL’s expectations of employees and suppliers to conduct business in a responsible and ethical manner, and strives to respect and protect human rights, personal security that is free from harassment or abuse of any kind, and provides a safe, clean and healthy workplace and living environment. Our Human Rights Framework supports our Human Rights Policy and provides specific commitments in relation to managing impacts on human rights (as shown below). These commitments relate to our workforce as well as our suppliers.

Policy Statement	Our Approach
<p><b>No Exploitation – Forced Labour</b>            Wilmar and its suppliers and sub-contractors shall not knowingly use or promote the use of forced or bonded labour or human trafficking and shall take appropriate measures to prevent the use of such labour in connection with their activities.            The company shall employ remedial actions in the case that such labour or trafficking is uncovered to ensure that victims are referred to the existing services for support and assistance.</p>	<ul style="list-style-type: none"> <li>- Standardized employment contracts</li> <li>- Passports return</li> <li>- Voluntary overtime</li> <li>- Ethical recruitment</li> <li>- Decent living conditions</li> <li>- Freedom of movement</li> <li>- No unlawful deductions</li> <li>- Access to remedy with no reprisals</li> <li>- Post arrival orientation</li> <li>- UK Modern Slavery Act</li> <li>- Transparency Statement Wilmar International</li> </ul>

The Wilmar Code of Ethical Conduct ensures that employees are aware of their obligations to maintain an acceptable and satisfactory level of conduct and personal behaviour, which includes a commitment to human rights as required by national legislation or at least as set forth in the United Nations Universal Declaration of Human Rights, the International Labour Organization’s (ILO)

<sup>2</sup> [https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/human-rights-policyed16f04afc7043738e7579b103a3a15e.pdf?sfvrsn=9378b7f5\\_2](https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/human-rights-policyed16f04afc7043738e7579b103a3a15e.pdf?sfvrsn=9378b7f5_2)

<sup>3</sup> [https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-code-of-ethical-conduct-policy\\_jun2019.pdf?sfvrsn=90af6353\\_2](https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-code-of-ethical-conduct-policy_jun2019.pdf?sfvrsn=90af6353_2)

<sup>4</sup> <https://www.wilmar-international.com/sustainability/policies#ndpe-policy>

<sup>5</sup> [https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/ndpe-sugar-policy.pdf?sfvrsn=9367bb03\\_2](https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/ndpe-sugar-policy.pdf?sfvrsn=9367bb03_2)



Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

Wilmar’s No Deforestation, No Peat, No Exploitation (NDPE) Policy aims to advance an environmentally and socially responsible palm oil industry, as follows.

**No Deforestation, No Peat, No Exploitation Policy**

No Deforestation			No Development on Peat		
No development of High Carbon of High Carbon Stock (HCS) Forests	No development of High Conservation Value (HCV) Areas	No burning	Progressively reduce greenhouse gas (GHG) emissions on existing plantations	Best Management Practices for existing plantations on peat	Where feasible, explore options for peat restoration by working with expert stakeholders and communities

**No Exploitation of People and Local Communities**

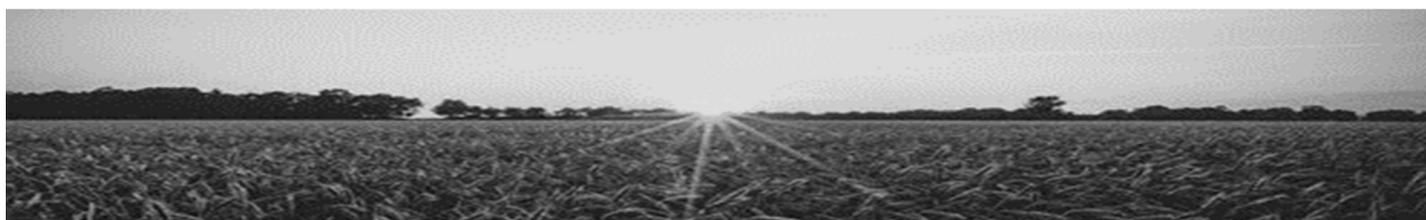
Respect and recognise the rights of all workers including contract, temporary and migrant workers	Facilitate the inclusion of smallholders into the supply chain	Free, Prior and Informed Consent (FPIC) from indigenous and local communities to operations on lands to which they hold legal, communal or customary rights	Resolve all complaints and conflicts through an open, transparent and consultative process

Embedded within the NDPE policy is a Complaints and Grievances section which allows employees and/or external personal to raise issues through an open, transparent and consultative process.

Strong policies and procedures are the base of our approach to combating modern slavery and sets the framework from which will help to identify and address potential or actual risks of modern slavery within our operations and supply chains.

In October 2021, WSPL took a further step to extend the Wilmar Group’s NDPE policy into the sugar business through its No Deforestation, No People Exploitation (NDPE) Sugar Initiative. NDPE Sugar sets out the key principles and approaches that will strengthen WSPL’s supply chain relationships with its suppliers, mitigate risks and promote responsible and sustainable practices.

Core to NDPE Sugar is a commitment from suppliers to create a transparent sourcing network through traceability mapping to understand WSPL supply chains and gain visibility to origin. The following principles are the core of NDPE Sugar, with Principle 1 particularly applicable to the prevention of Modern Slavery:



#### Principle 1. Protecting and Respecting People and Communities

- Respect and support internationally recognised human rights
- Respect and recognise the rights of all workers
- Respect and protect the rights of children and their welfare
- Respect land tenure rights
- Respect the rights of indigenous and local communities to give or withhold their Free, Prior and Informed Consent (FPIC) to operations on lands to which they hold legal, communal, or customary rights
- Identify measures to provide remediation where the company has caused or contributed to negative human rights impacts

#### Principle 2. Protecting natural ecosystems

- No conversion of legally protected areas or HCV areas
- GHG emissions are measured, with reduction targets in place

#### Principle 3. Enhancing operational practices

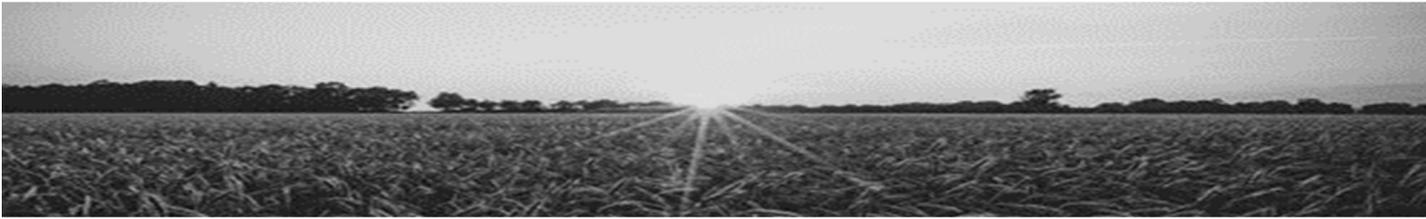
- Improving overall efficiency of operations
- Effective management of water
- Progressive implementation of agricultural best practice
- Preserve and enhance relevant biodiversity and ecosystem services

### 3.2 Identify

In the global sugar industry, one recognized risk is that of child labour and unfair labour practices associated with the production and harvesting of sugarcane that is a key farming input into the production of sugar. This is a specific concern for us and is addressed in Principle 1 of the NDPE Sugar Initiative mentioned above.

Accordingly, during the reporting period, we conducted a modern slavery risk assessment of supply base. A risk-based approach was undertaken in the analysis of our operations and supply chains, in which we considered the volumes of products purchased (in metric tonnes) and the suppliers' region of operations. Following the assessment, each supplier was assigned a modern slavery risk rating based on their country of operation. Each country's risk rating was based on the Global Slavery Index 2018<sup>5</sup>, published by The Minderoo Foundation and Transparency International's Corruption Perceptions Index.

<sup>5</sup> [https://downloads.globalslaveryindex.org/ephemeral/GSI-2018\\_FNL\\_190828\\_CO\\_DIGITAL\\_P-1624430125.pdf](https://downloads.globalslaveryindex.org/ephemeral/GSI-2018_FNL_190828_CO_DIGITAL_P-1624430125.pdf)

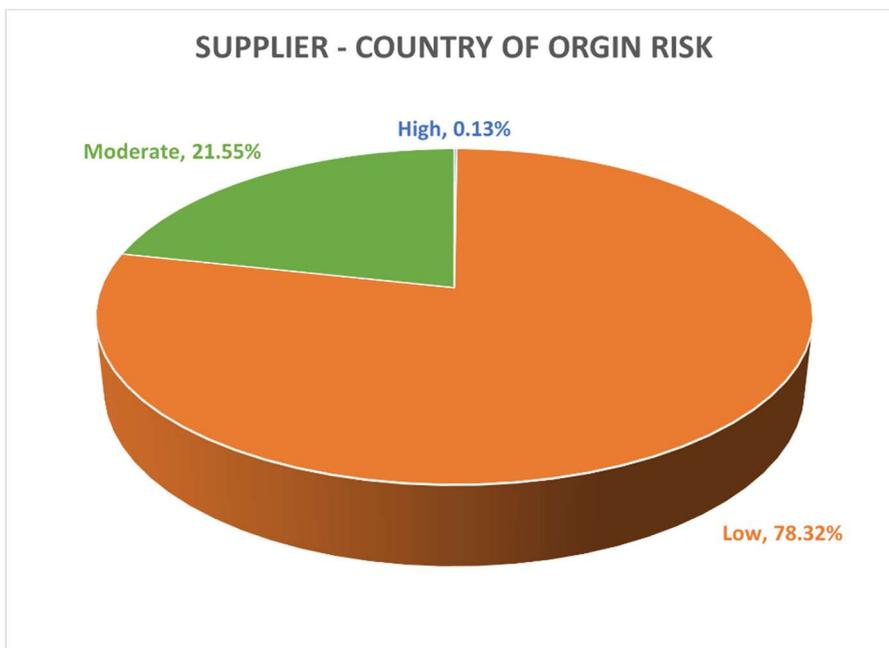


We have used the “Estimated prevalence of modern slavery by country”<sup>6</sup> table within this document to determine a risk level for each country as follows:

- Low risk – countries with prevalence of modern slavery of less than 5 per 1,000 population;
- Moderate risk – countries with prevalence of modern slavery of between 5 and 10 per 1,000 population; and
- High risk – countries with prevalence of modern slavery of 10 or above per 1,000 population.

Where no index was available for the country, then the risk was assumed to be high.

Below is a summary of percentage share of total volumes, by risk rating of our suppliers, being either low, moderate, or high.



#### Modern Slavery Risks

Based on our activities in 2021 and the policies listed and implemented in the section above, we have determined that there is a low risk of modern slavery being present in our supply chain.

We acknowledge that it is not always possible to achieve full transparency and oversight of modern slavery risks of our suppliers, and particularly where supply chains are located outside the countries of our operations.

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<sup>6</sup> Appendix 2: Part B: Global Slavery Index Prevalence Estimation, Table 4 located on page 178



During the reporting period, we did not identify any instances of modern slavery requiring remediation beyond the risk assessment already described. However, through the NDPE Sugar Initiative, our conversations remain ongoing with our suppliers, as we raise awareness of the risk of modern slavery and other forms of exploitation and further develop our understanding of our supply chains. Where relevant, these matters will be reported in future statements, along with any remediation measures required.

### 3.3 Mitigate

Effective due diligence involves regular assessment, including review of concerns raised through our grievance reporting mechanisms and supplier reporting through the NDPE Sugar Initiative.

Where a supplier is identified to have a higher risk of modern slavery, we may engage the supplier and initiate an action plan with them. We recognise our responsibility to proactively engage with suppliers and other relevant stakeholders to address the possibility of modern slavery where such a risk is identified.

Our Whistleblowing Policy<sup>7</sup> provides our employees a confidential avenue for reporting concerns about possible corporate improprieties and establishes a framework for independent investigations.

Further, we operate under Wilmar International Limited's Human Rights Framework<sup>8</sup> which operates a Grievance Procedure that provides confidential avenues for suppliers or other interested third parties to raise potential concerns or perceived issues in regard to human rights within our operations or supply chains.

### 3.4 Collaborate

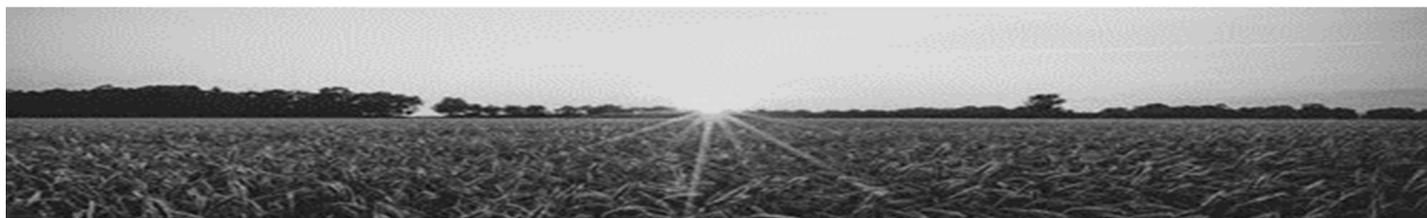
In accordance with Wilmar's Human Rights Policy, we will continue to work with other Wilmar Group companies to:

- report on human rights specific Key Performance Indicators (KPIs) in annual sustainability reporting;
- conduct a periodic review of relevant policies;
- participate in multi-stakeholder collaboration to promote and pursue key human rights principles; and
- engage in pre-competitive collaboration with peers to continuously improve on industry best practice, particular through our NDPE Sugar Initiative

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<sup>7</sup> [https://www.wilmar-international.com/docs/default-source/default-document-library/highlights/sustainability/2016/08/wilmar-whistleblowing-policy.pdf?sfvrsn=a79a6564\\_2](https://www.wilmar-international.com/docs/default-source/default-document-library/highlights/sustainability/2016/08/wilmar-whistleblowing-policy.pdf?sfvrsn=a79a6564_2)

<sup>8</sup> <https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/human-rights-framework.pdf>



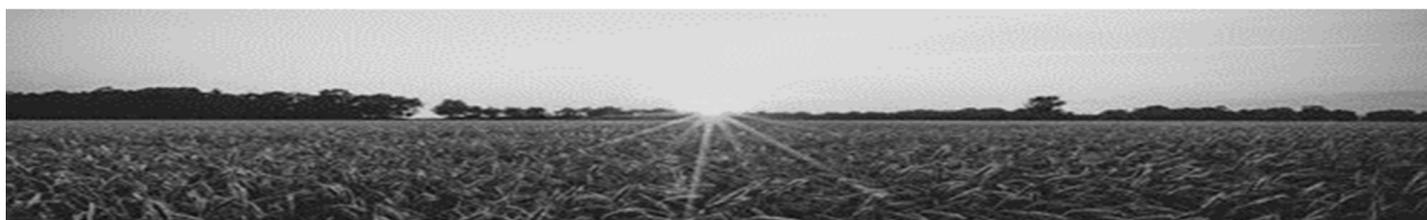
### 3.5 Evaluate

WSPL is committed to achieving year-on-year improvement in our approach to assessing and addressing modern slavery risks in our operations and supply chains. We will seek to assess the effectiveness of our overall approach by tracking the progress of the following goals during the second reporting period:

- monitor the concerns raised via the grievance mechanisms to assess if they reflect any modern slavery risk in our operations or supply chains;
- consider the ways in which modern slavery considerations can be incorporated into our procurement framework and processes;
- seek to obtain a deeper understanding of the modern slavery risks beyond the first tier of our supply chain; and
- seek to raise awareness of modern slavery within our workforce

## 4 Consultation Between Entities

WSPL's Modern Slavery Statement has been prepared with input from across the Company and its subsidiaries. WSPL and its subsidiaries are governed by the same policies, senior management and relatively consistent board members. There has been significant engagement, education and collaboration across the business functions. Internal stakeholders have been critical to our due diligence program, providing key information required to successfully carry out the assessment. Consultation has also been conducted with the broader Wilmar International Limited Group of entities.



## 5 Mandatory Reporting Criteria

This Statement was prepared to meet WSPL’s reporting requirements under the Modern Slavery Act 2018. The table below references where the mandatory criteria set out in the Act are addressed within this Statement.

Mandatory criteria	Reference in this statement
<b>Criteria 1.</b> Identify the reporting entity	Section 1 Reporting Entity
<b>Criteria 2.</b> Describe the reporting entity’s structure, operations and supply chains	Section 2 Our Structure, Operations and Supply Chain
<b>Criteria 3.</b> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 3.2 Identify
<b>Criteria 4.</b> Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Section 3.1 Manage Section 3.2 Identify Section 3.3 Mitigate
<b>Criteria 5.</b> Describe how the reporting entity assesses the effectiveness of these actions	Section 3.5 Evaluate
<b>Criteria 6.</b> Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Section 3.1 Manage Section 3.4 Collaborate Section 4 Consultation Between Entities