

ED&F Man Holdings Limited

Modern slavery and human trafficking statement

Summary

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

ED&F Man supports the UN Convention on Human Rights and is committed to transparency in its supply chains and business operations.

This statement sets out what we have done to ensure that slavery and trafficking are not taking place in any part of our business and that human rights are respected.

Our business and structure

ED&F Man is a global agricultural commodities merchant. We trade sugar, coffee, molasses, grains, pulses and animal feed – and provide access to commodity and capital markets through our brokerage business.

We are a majority employee-owned company; Südzucker, a German food producer holds a 34.99 per cent equity stake in the company. We employ over 7,000 staff in around 60 countries.

[Read our standards of business conduct](#)

Our policies

Human rights

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

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

[Read our CSR policy](#)

Labour standards

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

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

Child labour

We respect the ILO convention on child labour and children's right to an education, and support ending harmful child labour. As such, we:

- Make sure people under 18 are employed only in compliance with local law, UN guidelines and ILO conventions:
 - They may only perform 'light work'.
 - They must be properly supervised.
 - Their work must not interfere with their health or moral development.
- Will not employ children under the age of 15.

Our supply chains

We are confident there is no slavery or human trafficking in our directly managed organisation. As an agricultural commodities company that works extensively with partners, suppliers and customers across the world, parts of our supply networks could pose risks - particularly in places with large migrant or displaced populations, or unstable regions where vulnerable people could be at risk.

We work closely with suppliers to uphold proper practices in our supply chains, and inform our suppliers of ED&F Man and our customers' sourcing standards.

We expect our suppliers to comply with our standards and to share our commitment to ethical business conduct - including signing and adhering to our Supplier Code of Conduct.

[Read our supplier code of conduct](#)

Our Supplier Code of Conduct makes it clear that 'worker fees' - when workers pay employment agencies to get jobs - are not acceptable. We work to ensure this practice is

neither introduced nor tolerated and will work with the relevant local authorities to address any misconduct.

To identify and mitigate the risk of forced labour in our supply chains, we train producers and partners, including smallholders and their families, in best practices. For example, our coffee origin teams include over 200 field technicians and agronomists who help 36,000 coffee producers improve working conditions, achieve profitability and raise quality and safety standards.

We reserve the right to have third-party auditors check our suppliers' standards.

When adding new suppliers, we evaluate their ethical and sustainable practices as part of the supplier evaluation and acceptance procedure. When breaches to social, ethical or labour standards are reported up the agricultural supply chain we will investigate and enter into dialogue with suppliers involved. If such claims are confirmed, we will take necessary action which may include ending agreements with suppliers who abuse labour standards or violate our Supplier Code of Conduct.

Certification and results

External certification bodies regularly visit our trading and asset operations to check our certificates and adherence to standards. These bodies include:

- Control Union
- SGS
- Lloyd's Register Quality Assurance
- Kiwa PAI
- Validus

Our Shipping Division complies with the Maritime Labour Convention, which has set minimum age requirements and standards for employment and working conditions on ships. The Shipping Division also makes sure its partners and contractors meet the International Transport Workers' Federation requirements, or the local country's equivalent.

Our Fish Oil business is certified under the International Fish Oil and Fish Meal Organisation's responsible sourcing scheme.

[Read our responsible sourcing certificate for fish oil](#)

As a founder member of Bonsucro - originally known as the Better Sugarcane Initiative - we are helping set measureable social and environmental standards for producing sugarcane.

In 2016 Bonsucro awarded ED&F Man a multi-site certification for adherence to sustainable practices for both our sugar and molasses businesses. Independent certification bodies audited our activities, processes and documents for compliance to this standard, resulting in

Bonsucro certification of our London, Singapore, Miami, Amsterdam and New Orleans trading offices, and our operational assets including:

- Singapore (SIS'88 and Asian Blending)
- Ukraine (USC)
- The Czech Republic (Man Ingredients)
- India (Uniworld)

The certification recognises our commitment to source sugar from certified suppliers that demonstrate sustainable farming and production practices.

[Read our Bonsucro certification for sustainable practices](#)

Our Coffee business, Volcafe, develops and operates certified and verified supply chains across all our origins. These include the Global Coffee Platform (4C), UTZ Certified, Rainforest Alliance, Nespresso AAA, Cafe Practices and a range of customer codes of conduct.

FLO-CERT, the independent certification body that checks products and supply chains practices against Fairtrade standards has said that Volcafe meets the following Fairtrade standards:

Trader – Payer

- Generic Fairtrade Trade Standard
- Fairtrade Standard for Coffee for Small Producer Organisations

And the following FLO-CERT certification requirement:

Trader – Payer

- FLO-CERT Public Compliance Criteria List – Trade Certification

[Read our FLO-CERT certificate for supply chain practices](#)

Volcafe is UTZ-certified, which guarantees that our coffee is traceable from producer to roaster, and our products have been grown and harvested in a responsible manner.

[Read our UTZ certificate for responsible practices](#)

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

Communicating policies to our staff, suppliers and subcontractors

Each director, manager, officer, employee and representative of the group is required to comply with our Standards of Business Conduct; these standards have been shared with our employees and are available in English, Spanish and Portuguese.

Managers at all levels are responsible for promoting a culture that:

- Supports the conduct of ethical business
- Encourages open communication
- Upholds our Standards of Business Conduct

Listening to our stakeholders

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

[Read our whistleblowing policy](#)

Main developments 2015–16

- Bonsucro awarded ED&F Man a multi-site certification for sustainability practices and confirmed our Sugar and Liquid Products business uses sustainable and ethical practices.
- We drafted and approved a new Supplier Code of Conduct, which we sent to existing suppliers; we now send this to new suppliers to sign as part of our approvals process.

This statement is made as part of the UK's Modern Slavery Act 2015.

ED&F Man's board has approved this statement for the financial year starting in October 2015 and ending September 2016.