



UK Modern Slavery Act Statement 2023-24

This Statement sets out the steps taken by ED&F Man Commodities and our businesses during the year ending on 30 September 2024

March 2025

ED&F Man Commodities

UK Modern Slavery Act Statement 2023-24

As a leading international soft commodities trading group, ED&F Man Commodities takes its responsibility to helping eradicate modern slavery extremely seriously.

As an agricultural commodities trader with a long history operating in over 40 countries with 3,000 suppliers and 3,000 employees, we are vigilant in implementing our human rights policies and extending our business values to our suppliers and clients. We are highly alert to the risks that our extensive supply network presents in terms of slavery, trafficking, child and/or forced labour.

We welcome the heightened focus on human rights by governments and global legislation including the EU Human Rights and Environmental Due Diligence Directive and Germany's Supply Chain Act. The UK Modern Slavery Act of 2015 was a groundbreaking piece of legislation that places the responsibility on businesses to disclose publicly the steps they are taking to tackle forced labour and human trafficking.

ED&F Man Commodities upholds the UN conventions on human rights and operates a zero-tolerance approach to modern slavery in our own operations, and in our supply chain partners. We are committed to transparency across our supply chains and all our business operations, and we work with partners who are potentially 'at risk' towards eradicating all forms of modern slavery and forced labour.

This Statement sets out the steps taken by ED&F Man Commodities during the year ending 30 September 2024 to prevent modern slavery and human trafficking in our business and supply chains and to promote greater inclusion, respect, and opportunity in the communities we operate in through training, education, and social impact projects.

Since the launch of our new Sustainability Strategy across the three pillars of Environmental Stewardship, Improving Lives, and Responsible Sourcing in FY22, we put significant effort into having in place effective responses to the risk of modern slavery, and into ensuring that our workplace culture follows the highest EDI standards and that we have a positive impact on the communities in which we operate.

This is our eighth UK Modern Slavery Act statement.



Chris Mahoney
Chair

Our business

ED&F Man Commodities 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, and animal feed ingredients.

We employ 3,135 people in 40 countries across Europe, the Americas, Asia, Africa, and the Middle East and have an annual revenue of \$8.0 billion (year ended 30 September 2024).

Our supply chains are extensive and global; we serve over 4,000 customers from over 3,000 main suppliers, these being producers, exporters, intermediaries, or other traders. Details on our international locations can be found on our website.

Organisational structure

ED&F Man Commodities publishes this statement on behalf of ED&F Man Holdings Ltd (ultimate parent). The Board of ED&F Man Holdings delegates authority to ED&F Man Commodities' individual trading divisions to formulate and implement business strategy and manage commercial operations on the basis that the divisions are obligated to embed in their operations the Board-established policies, procedures, culture, and values.

This statement covers all our wholly owned subsidiaries and our component businesses inside and outside the UK.

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

Overview of our efforts

ED&F Man Commodities and its globally owned businesses are committed to conducting business in an ethical and responsible manner. As part of this commitment, we fully support the UK Modern Slavery Act of 2015 ('the Act') and its aim to eradicate modern slavery and human trafficking from our supply chains and operations.

We recognise that modern slavery is a global issue that affects millions of people around the world. As a result, we are committed to ensuring that we do not knowingly engage in any form of modern slavery or human trafficking. We recognise our responsibilities under the Act and are committed to taking all necessary steps to ensure compliance with this legislation.

Our policy statement

Our company operates a zero-tolerance approach to modern slavery, forced labour, and human trafficking. We will not knowingly support, facilitate, or condone any activity that involves modern slavery or human trafficking in our operations or supply chains.

We are committed to conducting business in an ethical and socially responsible manner, in line with ED&F Man's [Standards of Business Conduct](#) document, and we expect the same standards from our suppliers, contractors, and business partners by requiring them to sign and return a copy of our [Supplier Code of Conduct](#) as part of the supplier evaluation and onboarding process.

Due diligence¹ and risk assessment

We conduct due diligence on new suppliers and business partners to ensure they meet our standards and verify compliance. By the end of 2025, we aspire to have all suppliers signed up to our Supplier Code of Conduct. As suppliers are added every year, this is an ongoing process. We conduct risk assessments of our key supply chains to identify any areas of potential risk and take appropriate steps to mitigate these risks to ensure our suppliers and business partners continue to comply with our policies and standards.

Training

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

Reporting and whistleblowing

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

Key Performance Indicators, monitoring, and review

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

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

Our culture

Sustainability, respect, and integrity guide our business practice. Our new Sustainability Strategy is tied to the UN Sustainable Development Goals (SDGs) and keeps us on track with our environmental, social, and supply chain targets.

Across our businesses and territories, we have respect for natural resources and strive to reduce the use of energy, water, waste created, and our carbon footprint. We recognise that climate change is one of the main threats to social stability in the world, contributing to greater food insecurity, social inequalities, and migration, and thereby increasing the likelihood of human rights abuses, and we have strategies and programmes in place in our Coffee, Sugar, and MLP divisions to tackle it.

¹ According to Sustainability Reporting Standards (GRI Standards), Due Diligence is elaborated by *the United Nations (UN) Guiding Principles on Business and Human Rights*, the *Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises*, and the *OECD Due Diligence Guidance for Responsible Business Conduct*.

Improving lives

Social responsibility

ED&F Man Commodities aims to extend beyond compliance to improve the lives of people with whom we do business and the wider communities in which we operate. In FY24, more than 50 impact projects were implemented (or further developed) across our three divisions under the banner of Improving Lives, with the intention of improving livelihoods and climate resilience of the farming and milling communities from which we source, and empowering underrepresented groups.

At a fundamental level, we uphold the **United Nations' Universal Declaration of Human Rights** and **International Labour Organization (ILO) principles**. This means we work hard to ensure that all our employees experience a healthy and safe workplace. We do not discriminate in our employment practices, do not use child or forced labour, and we respect the rights of all our employees. We treat our people as our chief asset – they are our future. Our company culture and supporting programmes and practices are focused on attracting, retaining, and growing our team and creating an open, inclusive, and equitable business.

Furthermore, we strive to have a positive impact in the grower communities where we source our commodities. Initiatives include building infrastructure for schools and health centres in coffee growing districts in Uganda and Vietnam; a successful agroforestry project in post-conflict Colombia where farmers planted natural corridors of coffee interspersed with native tree species; the expansion of our water security and climate adaptation project to three additional sugar farming communities in El Salvador through the MAS Program; and women's projects and philanthropic giving through our ChariCo fund. Read more in our [Sustainability Report](#).



- Implement **community projects**
- Improve Group **Equity, Diversity & Inclusion**
- **Zero workplace accidents**

Improve quality of life for our employees and people in our value chain through improved company policies and impact projects



Our social policies

Human rights

Our group-wide [Sustainability Strategy](#) 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 and collective bargaining.

International Labour Organization (ILO)

We support the principles of the 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.

Elimination of forced labour, child labour, and violations of the law

Violations of human rights, forced labour, human trafficking, and the failure to meet legal requirements are unacceptable. We aim to do business with suppliers who share our commitment and the adherence to applicable laws.

We respect the ILO convention on child labour² and children's right to an education. We also support the ending of harmful child labour. The following applies to all our companies.

Workers between the ages of 15 and 18 shall only be active in light work³, non-hazardous⁴ work under proper supervision, and only when this does not interfere with compulsory education.

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

Equity, Diversity, and Inclusion (EDI) policy

This year we continued to promote awareness and understanding of our unified, global EDI Policy throughout the organisation. We are committed to taking practical action on preventing and addressing discrimination and harassment, communicating a clear policy, educating colleagues, and raising awareness of EDI matters and providing safe channels for reporting. This means being open about where inequalities may exist – from top management down to the warehouse floor. The policy can be read in our [Sustainability Report](#).

² Child labour is defined by ILO as *work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally physically, socially, or morally dangerous and harmful to children; and/or interferes with their schooling.*

³ Light work is defined by ILO as *activities that are not dangerous for the health, safety and development of the child, and which do not interfere with their schooling. These are often domestic tasks, helping in small tasks at family shops, or small seasonal work.*

⁴ Hazardous child labour is defined by Article 3 (d) of ILO Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999, a: *(d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.*

Responsible sourcing

The products we trade are safe for their intended use and comply with a rigorous set of local and international feed and food laws and industry standards, both in the countries of origin and the destination markets. Our mission to supply safe products is underpinned by five key principles:

- Compliance and leadership
- Supplier assessment and acceptance
- Preventive risk management
- Harmonising and simplifying quality and food safety management systems
- Raising awareness

Recent progress from our divisions

Coffee's big strategic focus in 2024 has been the roll-out of the Volcafe Responsible Sourcing (RS) standard – which sets baseline standards for sustainable sourcing and ensures enhanced traceability for customers – in nine countries (Brazil, Colombia, Costa Rica, Guatemala, Honduras, Peru, Tanzania, Uganda, and Vietnam). The first shipments left Vietnam in February 2024 and Volcafe RS coffee now accounts for 5 percent of Volcafe's sales of responsibly sourced coffees (including certified company schemes and Volcafe RS) this fiscal year. Coffee is a (B) member of SEDEX⁵, the Supplier Ethical Data Exchange, a not-for-profit organisation that enables companies to share information and promote ethical and responsible business practices in supply chains.

Sugar achieved a significant increase in sales of sustainably certified sugar of 25 percent since last year. The total of Bonsucro and Fairtrade sales in FY24 was 64,175 MT versus 51,033 MT in FY23. There has also been a substantial increase (98 percent since FY23) in the number of suppliers who have signed the ED&F Man Supplier Code of Conduct (now 131).

MLP made progress with new certifications (Organic and MarinTrust) and has reduced its carbon footprint through energy and resource efficiency such as installation of solar panels and replacing drying systems.

Volcafe as a division and ED&F Man Sugar in Madrid have the [Ecovadis](#) Gold Rating. ED&F Man SA de CV (MLP division in Mexico) has the Ecovadis Silver Rating.



Responsible
Sourcing

- Increase % responsibly sourced products
- Assess ESG supply chain risks
- Obtain group ESG rating

Provide supply chain assurance and reduce sourcing risks



4

⁵ SEDEX is one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains, and providing an online platform, tools, and services to help businesses operate responsibly and sustainably, protect workers, and source ethically. It supports the future of coffee by contributing pennies per pound on every green coffee purchase.

Standards of Business Conduct

We are a global business, so we understand that local customs, conditions, and business practices may vary – but we must uphold our core values and ethical principles wherever we operate. Our Standards of Business Conduct, which we upgraded during this reporting period ensure that we comply with the law. Our own customers demand this, too. We therefore only work with suppliers who share our commitment to protecting basic human rights and who understand their social and environmental responsibilities.

We comply with the law and have a policy of zero tolerance towards corrupt practices. As well as our own commitments, we also expect direct suppliers to comply with our Standards of Business Conduct, which are available to read on our website [here](#).

Certifications

A wide range of our products are sourced under the standards of the following third-party sustainability certifications and company programmes.

	Coffee	Sugar	Liquid Products
4C	X		
AAA Quality Program	X		
Bonsucro		X	X
C.A.F.E. Practices	X		
Fairtrade	X	X	
ISCC			X
MarinTrust			X
Organic	X	X	X
Rainforest Alliance	X		
Volcafe RS	X		

Certifications may be in place in selected countries / entities

Training and communicating our values

Training our employees

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

Listening to our stakeholders

We launched [Speak Up](#), an online grievance reporting tool, as part of our ongoing commitment to nurture a culture of openness and accountability, where our people are empowered to raise concerns. Speaking up, often referred to as 'whistleblowing', is the reporting of activities which fall within the following categories:

- illegal
- contrary to policy, regulation, procedure, or instructions
- likely to endanger service users, members of the public, and/or colleagues

Reports can be submitted anonymously via a portal which is available in multiple languages 24 hours a day, seven days a week, 365 days a year. Our company has a policy in place to protect whistleblowers from retaliation. For more information on whistleblowing and our responsibilities, please refer to our [Whistleblowing Policy](#).

The main points of contact for external and internal issues:

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

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

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 the above references.



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