

Financial Year 2022-23 (1st April 2022 – 31st March 2023)

United Molasses Trading Limited Modern Slavery and Human Trafficking Statement

Policy Statement

Section 54 of the United Kingdom's Modern Slavery Act 2015 ('the Act') encourages increased transparency within businesses and supply chains. Section 54(1) of the Act places a statutory obligation on commercial organisations, in any part of a group structure, that supply goods or services with an overall turnover of £36 million or more to produce a "slavery and human trafficking statement" for each financial year. Such an organisation has an obligation to produce a statement within 6 months of their financial year-end, indicating their position, policies and due diligence in relation to modern slavery and human trafficking.

United Molasses Trading Limited ('UMT') remains committed to ensuring that modern slavery and/ or human trafficking does not occur within our business and, to the best of our ability, in our supply chain. Our policies and our interaction with colleagues, suppliers and customers, continues to reflect our commitment to acting ethically in all our operational matters. In the past financial year, we continued to review our approach towards modern slavery, striving to ensure that we, and our supply chain, act in compliance with the Modern Slavery Act 2015.

Our Business

UMT is a subsidiary of the United Molasses Group Limited and is responsible for co-ordinating the Global procurement and sales of cane molasses, beet molasses, CMS and other co-liquid products. All of our raw materials are produced from agricultural crops, primarily sugar beet and sugar cane and the majority of our products are purchased directly from source in a fully traceable supply chain. UMT is certified to the Feed Materials Certification Scheme (FEMAS), GMP+ Feed Certification Scheme (GMP+), International Sustainability & Carbon Certification Scheme (ISCC), Soil Association (organic), ISO 9001 and Bonsucro Standards.

Due Diligence

As part of our modern slavery due diligence, this past year has seen an increased focus on ensuring a coherent understanding of modern slavery legislation across Senior Management. In addition, we have taken the following steps:

1. Undertaken a risk assessment of areas within our business and our supply chain, with a particular focus on child labour, forced labour, health and safety, workers' rights, diversity and the payment of the minimum wage in accordance with national standards. The risk areas were identified using the latest data published on the [2023 Global Slavery Index](#); and
2. Taken steps to assess and manage the risks identified including:
 - a. Auditing our supply chain;
 - b. Issuing a new Environmental, Social and Governance ('ESG') Policy and establishing an ESG committee to manage risks;

- c. Introducing a new internal online training package in relation to modern slavery and human trafficking. This training is now mandatory for all members of staff and is a part of the induction process for new start employees;
- d. Complying with our Slavery and Human Trafficking Statement; and
- e. Ensuring that modern slavery and our response to such is a regular agenda item for the Board's consideration.

Assessing and managing risks

Through our risk assessment, we identified that our supply chain is the key area that our business must monitor in order to limit the risk of slavery and human trafficking.

Specifically and in relation to our supply chain, we have used the **2023 Global Slavery Index** data to identify high-risk countries where our suppliers may operate. We conduct an audit on a selection of these suppliers annually to identify whether they present any concerns regarding modern slavery. This year, the selection of suppliers consisted of: all new suppliers, high-risk suppliers who had not been approached in the last three years and suppliers who had previously not completed a questionnaire. To manage this risk and to ensure those within our supply chain are also aware of their obligations, we have also rolled out a compliance initiative as part of our quality assurance programme and vendor approval process. Our ethical trading risk assessment now forms an integral part of the approval process for new vendors; and will include annual spot checks for approved vendors.

As well as raising awareness within our shipping department, we require that vessels we charter comply with International Transport Workers Federation (ITF) or equivalent.

As part of our continual commitment to tackling modern slavery in our supply chains, UMT have maintained certification to the [Bonsucro Chain of Custody Standard](#) and continue to be members of [Sedex](#), which is one of the largest collaborative platforms for sharing responsible sourcing data on supply chains. With more Bonsucro certified molasses becoming available, UMT will continue to support the use of this molasses as well and encourage our suppliers to join and maintain membership with global organisations such as Sedex.

Effectiveness of our procedures

To measure our effectiveness in ensuring that, as far as is practicable, modern slavery is not taking place in our business or our supply chain we compile the responses received from our audit questionnaires so these can be assessed. This process allows us to identify any concerning responses received, compare these with previous responses, and decide on what follow up action may be required with any entities, in subsequent reporting periods.

Policies

We are committed to addressing modern slavery and ensuring ethical compliance, and have developed policies that reflect the values that we adhere to as a business. This includes an ESG Policy, Whistleblowing Policy, an Anti-Slavery and Human Trafficking Policy and online training on such policies. These policies are made available within our staff handbook, and provide both an explanation of our obligations in regard to modern slavery, as

well as a safe reporting mechanism for whistleblowing. The provision of these policies reinforce the need for effective systems and controls which seek to ensure as far as possible that modern slavery is not taking place anywhere within our own business. Relevant policies can be made available to third parties on request.

Training

We have developed new online training for our staff on the issue of modern slavery within our supply chains and our business and have delivered that training to all members of UMT. The purpose of this training is to ensure that our employees have an understanding of modern slavery which may occur in our business or supply chain.

UMT acknowledges our responsibilities in relation to ethical business activity and tackling modern slavery within our supply chain and business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in relation to the financial year 1st April 2022 – 31st March 2023. This statement was reviewed and approved by the Board of United Molasses Trading Limited on 28th September 2023.



Ben Macer

Chief Executive Officer
United Molasses Group Ltd
29th September 2023