

Financial Year 2023-24 (1st April 2023 – 31st March 2024)

United Molasses GB 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 GB ('**UMGB**') is committed to ensuring that modern slavery and/ or human trafficking does not occur within in our business and, to the best of our ability, in our supply chain. To demonstrate this commitment, this is the second statement UMGB has prepared and uploaded voluntarily on the basis that the company is likely to meet the financial threshold by the end of the financial year. Our policies and our interaction with colleagues, suppliers and customers, also continues to reflect our commitment to acting ethically in all our operational matters. In the past financial year, we reviewed 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

UMGB is a subsidiary of the United Molasses Group Limited ('**the Group**'/ '**UMG**') and is responsible for the marketing of cane molasses, beet molasses, CMS and other co-liquid products into the GB market. All of our raw materials are produced from agricultural crops, primarily sugar cane and sugar beet, in a fully traceable supply chain. UMGB is certified to the Universal Feed Assurance Scheme (UFAS), the Feed Materials Assurance Scheme (FEMAS), and ISO 9001.

Due Diligence

As part of our modern slavery due diligence, 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 of national standards. The risk areas were identified using data published on the [2023 Global Slavery Index](#) and the [List of Goods Produced by Child Labour or Forced Labour](#) produced by the Bureau of International Labor Affairs.
2. Taken steps to assess and manage the risks identified including:
 - a. Undertaking a risk assessment of our supply chain;
 - b. Integrating management of the Modern Slavery Act 2015 into our central ESG Committee to manage risks;

- c. Developing our internal online training package in relation to modern slavery and human trafficking by translating the training into all languages spoken across the UMG. 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. Our main cane and beet molasses supplier is another internal business unit, United Molasses Trading Limited ('**UMT**'), who also publish their own modern slavery statement and manage their own supply-chain risks centrally. As part of our due diligence last year, modern slavery audit questionnaires were issued to UMT's suppliers.

For this financial year, through UMGB's risk assessment found that other suppliers to UMGB were considered low-risk and these suppliers are primarily located in the UK. Therefore no further evaluation was undertaken during this financial year as a full audit was undertaken in the financial year 2022/23 we intend to issue audit questionnaires to such suppliers on a triannual basis.

To continue 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.

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 have reviewed the due diligence undertaken by our highest risk supplier (UMT). This process allows us to identify any concerning responses received, compare these with previous responses and decide on what follow up action (if any) 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.

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our business and supply chains. We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Environmental, Social and Governance ('ESG') Policy.
- Whistleblowing Policy.

Training has been provided on the above policies and these are made available within our staff handbook which is readily available from Human Resources.

The provision of these policies reinforces the need for effective systems and controls and seek to ensure, as far as possible, that modern slavery is not taking place anywhere within our own business. Relevant policies can also be made available to third parties on request.

Training

Our online training programme was completed by all UMGB staff in the financial year 2022/23 and covers the issue of modern slavery within our supply chains and our business. 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 and are equipped with the knowledge and confidence to identify risks and report concerns.

UMGB 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 2023 – 31st March 2024. This statement was reviewed and approved by the Board of United Molasses GB on 26th September 2024.



Ben Macer

Chief Executive Officer
United Molasses Group Ltd
27th September 2024