

Financial Year 2021-22 (1st August 2021 – 31st March 2022)

United Molasses Trading Limited Modern Slavery and Human Trafficking Statement

Policy Statement

United Molasses Trading Limited (UMT) remains committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. 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, with the majority of our products purchased directly from source in a fully traceable supply chain. UMT is certified to FEMAS, GMP+, ISCC, Soil Association (organic), ISO 9001 and Bonsucro Standards.

Due Diligence

We have:

1. Undertaken a risk assessment, of areas within our businesses and our supply chain, with a particular focus on child labour, forced labour, health and safety, workers' rights, diversity and minimum pay. The risk areas were identified using data published on the 2018 Global Slavery Index; and
2. Taken steps to assess and manage the risks identified including:
 - a. Auditing our supply chain;
 - b. New internal online training package; and
 - c. Complying with our Slavery and Human Trafficking Statement.

Assessing and managing risks

Through our risk assessment, we consider that supply chains are key areas which our business must control in order to limit risk of slavery and human trafficking.

Specifically and in relation to our supply chain, we have used the 2018 Global Slavery Index data to identify high risk countries where our suppliers may operate. We audit a selection of these suppliers annually to identify whether they present any concerns regarding modern slavery. 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 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 chartered by shipping agents on our behalf comply with internationally recognised trade federation guidance and regulation.

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 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 chains, 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 which reflect the values we adhere to as a business, including a Whistleblowing Policy, an Anti-Slavery and Human Trafficking Policy and induction training. These policies have been 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. It also reinforces the need for effective systems and controls which seek to ensure as far as possible that modern slavery is not taking place anywhere in our own business. Relevant policies can be made available to third parties on request.

Training

We have developed training for our staff on the issue of modern slavery within our supply chains and our business and have delivered that training to the Senior Executive and Senior Management team already. A new online training course has just been developed and all new starters will be required to complete the training when they join.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in relation to the financial year 1st August 2021 – 31st March 2022. This statement was reviewed and approved by the Board of United Molasses Trading Limited on 4th August 2022.

A handwritten signature in black ink, appearing to read 'Ben Macer'.

Ben Macer

Chief Executive Officer
United Molasses Group Ltd
29th September 2022