

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

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 ('the Group' / 'UMG') 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 the [List of Goods Produced by Child Labour or Forced Labour](#) produced by the Bureau of International Labor Affairs ('ILAB').
2. Taken steps to assess and manage the risks identified including:
 - a. Auditing 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.

Specifically and in relation to our supply chain, we have used resources such as the **2023 Global Slavery Index** and the **List of Goods Produced by Child Labour or Forced Labour** to identify high-risk countries in which 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. We undertook a risk assessment of and audited some manufacturers of our products who we have not previously audited.

To further 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.

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 UMT 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.

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

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

Ben Macer

Chief Executive Officer
United Molasses Group Ltd
27th September 2024