



gemcom
TRADING GRAIN, FOOD & FEED INGREDIENTS

Modern Slavery Statement



FOREWORD FROM THE CEO

At Gemcom, we believe that ethical and sustainable sourcing is not just good business practice — it is a moral obligation. Since our launch in 2004, we have worked closely with our partners to build a supply chain that respects people, protects the environment, and upholds the highest standards of integrity. We remain fully committed to eliminating modern slavery and human trafficking from every link in our supply chain. This statement outlines our approach and progress to achieving this aim.



Our Company

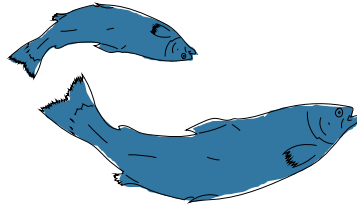
IN 6 MARKET SECTORS



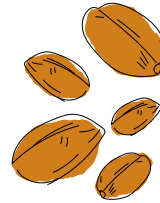
**Animal
feed**



Organic



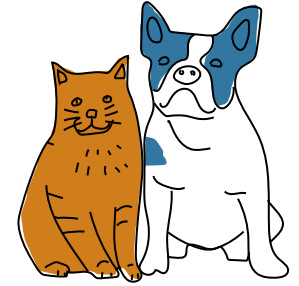
Aquaculture



**Food
ingredients**



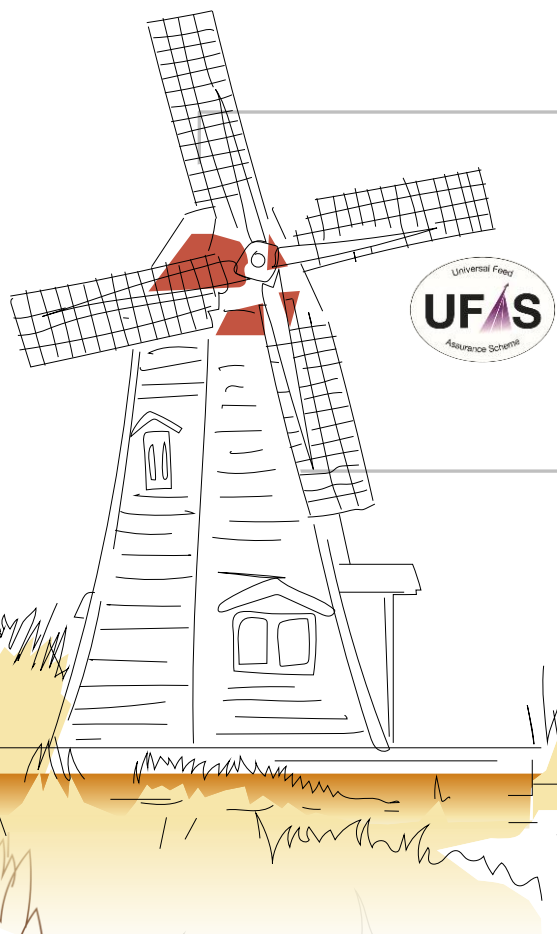
Non-GMO



**Pet
food**

Gemcom is a privately-owned importer of grain and feed materials for the animal feed, pet food, human food, and aquaculture industries. Based in central London, our dedicated team of traders, logistics specialists, and technical experts work as sourcing partners for our customers, not just as commodity traders. We specialise in niche ingredients such as high-protein cereal-based meals, vegetable oils, and organic raw materials. Products are imported and stored in strategically located, accredited facilities and delivered to customers in both bulk and bagged formats.

Our Supply Chain



Our supply chain extends across multiple continents, sourcing from both large-scale producers and smaller specialist suppliers. While our supplier base is diverse, our focus remains on ensuring that every partner meets strict ethical, environmental, and quality standards.

Modern Slavery Statement And Policy

Gemcom is committed to sustainable production of our products which can only be ensured by close co-operation with our suppliers. Gemcom is also fully committed to a supply chain free from modern slavery and human trafficking. To that end Gemcom have in place: –

Gemcom Ethical Trading Policy (Ref A-002)

Gemcom Health and Safety Policy (Ref A-003)

Gemcom Environmental Policy (Ref A-004)

Membership of SEDEX and the use of The Ethical Trading Initiative (ETI) Base Code

Gemcom Policy Statement on Non-GMO Soybean Meal (Ref A-007)

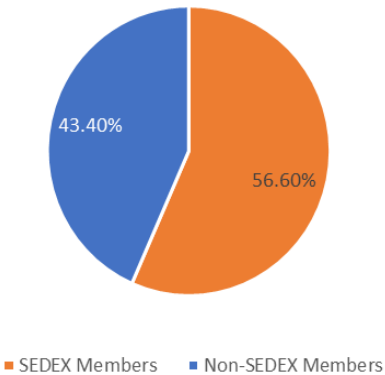
Gemcom Quality Policy Statement (Ref A-008), which includes the policy to maintain feed safety through accreditation and the sole use of accredited suppliers of product and services.



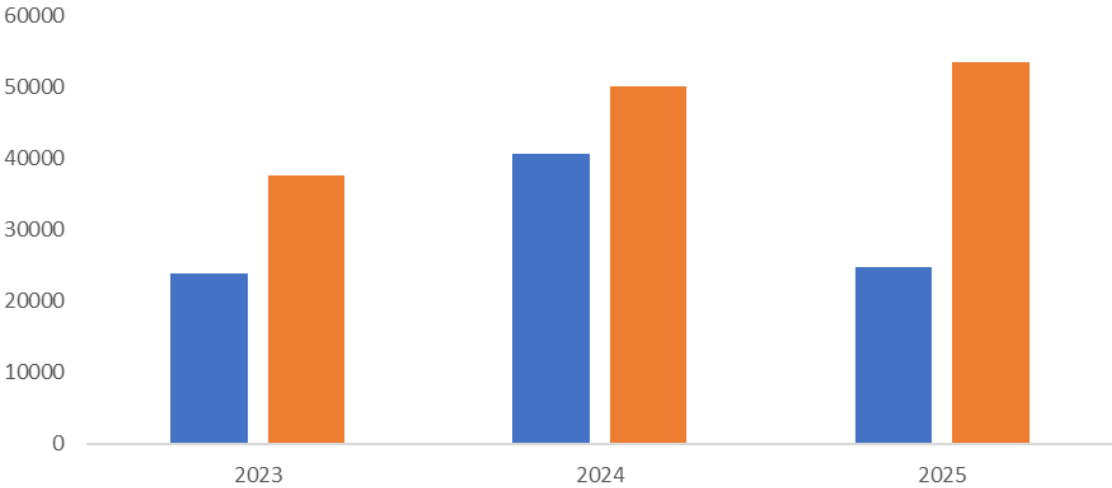
Key Performance Indicators

As in previous years, we assess the compliance of our suppliers to ethical trading by auditing membership of the Suppliers Ethical Data Exchange (SEDEX). We can report that for 2025, 56% of our current suppliers are members of SEDEX, increasing from 52% in 2024 and 48% in 2023. In terms of traded volumes, 68.3% of our total tonnes were sourced from SEDEX-certified suppliers in 2025, compared to 55.2% in 2024 and 61.2% in 2023. This reflects our continued commitment to prioritising ethically certified suppliers for the majority of our traded volumes. We will continue to assess our supplier base through the Sedex platform, alongside other recognised ESG certification schemes, to strengthen transparency and alignment with Gemcom’s sustainability goals.

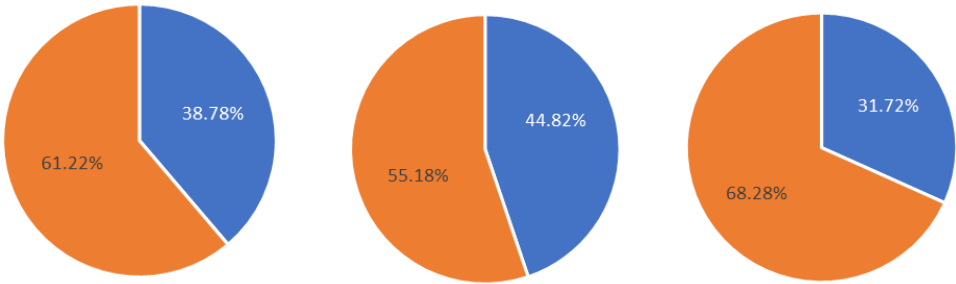
Total % of Suppliers who are SEDEX Members



Tonnage of Agricultural Commodities Bought From Suppliers With and Without SEDEX Certification From 2023-2025



■ Without SEDEX ■ With SEDEX



Governance and Accountability



Oversight for human rights and modern slavery compliance sits with our senior management team, supported by procurement, logistics, and technical specialists. ESG progress is reported to the CEO annually.

Due Diligence, Staff Training and Risk Assessment

Gemcom ensures all suppliers and products are only source from suppliers who comply with local law and are fully accredited to recognised schemes for feed safety and responsible sourcing. We endeavour to regularly visit suppliers to assess current and ongoing activities as far back to origin as possible. All employees are trained in all policies at induction and on an annual basis.

Declaration

This statement was approved by:
Gavin Millar, CEO of Gemcom
31st July 2025

