

MODERN SLAVERY ACT 2015

Statement of compliance for the year to 31 December 2023

This statement is made pursuant to section 54, Part 6 of the Modern Slavery Act 2015 ("the Act") and is published on behalf of Camellia Plc ("the Company"). This statement sets out the steps the Company has taken to prevent modern slavery and human trafficking in its supply chains as well as commenting on steps being taken by the operating companies in which it is invested.

OVERVIEW

The Company is the ultimate holding company of a diverse group of companies ("the Group"). Within the Group, the Company has interests in several agricultural, engineering and food service companies ("the Operations"), as well as other investments. The Operations are in Bangladesh, Brazil, India, Kenya, Malawi, South Africa, Tanzania and the UK. The majority of the Group's turnover is derived from the Operations in the agricultural sector through the growing of tea, avocado, macadamia, apples, pears, cherries, plums, rubber, wine grapes, blueberries, arable crops, forestry and the raising of cattle. The agricultural Operations have the greatest exposure to risk of modern slavery and human trafficking.

The Operations are fundamentally connected to the welfare of the communities and the environments in which they operate. Consistent with the Group's long-standing commitment to high legal and ethical standards, the Operations prohibit slavery, human trafficking or forced labour in any form in their businesses. It is recognised that modern slavery exists in many different forms and can be difficult to detect, particularly in the supply chain.

The agricultural Operations have substantial undertakings in the UK, India, Bangladesh, Brazil, Kenya, Malawi, Tanzania and South Africa. As is common in the sector, it is necessary to employ a large number of seasonal employees to harvest, process and transport crops at peak times. The Operations pay wages, benefits and allowances in accordance with local legislation and Trade Union agreements. The Operations have received and maintain certifications with challenging ethical standards from, *inter alia*, Fairtrade, WIETA, SMETA-ETI and Rainforest Alliance which require detailed audits of employment practices in the Operations and of key suppliers.

Responsibility for legal and ethical compliance is devolved to the leadership of each of the Operations. Ultimately, the individual Operations have the local experts who are best

placed to identify relevant needs and apply the processes and practices that allow them to operate responsibly and ethically over the long term.

TRAINING

The Company has undertaken and continues training of its directors and relevant employees. Likewise, the Operations have undertaken and continue training of their relevant employees to raise awareness of the Act and assist in identifying risks in their given businesses and the supply chains. The Operations look to work with their tier one suppliers and some tier two suppliers in managing these risks. To date, no concerns have been identified.

SUPPLY CHAIN RISKS

The Company itself has only limited direct supply chains which are predominantly in the UK. The goods and services the Company purchases to deliver its services primarily relate to information technology, professional services, travel, catering, property, facility management and maintenance.

The Operations in which the Company has interests have more involved local supply chains. The majority of the tier one suppliers for the agricultural operations are outgrowers and smallholders. The agricultural operations purchase product from these growers at a market related price which they then process, pack and sell via their own channels to market. The Operations have set up programs to support local outgrowers and smallholders to help them with their farms and crops. All product purchased is paid for in a timely manner. Operations also provide advice to these farmers on how to improve yields and adopt sustainable cultivation practices. These efforts have been beneficial both to the farmers and the Group over recent years through achieving increased volumes and quality. Operations have also undertaken training within their outgrower and smallholder groups on the provisions of the Act and will continue this process. Some of the tea smallholders are Fairtrade and Rainforest Alliance certified.

Where applicable, the Operations will undertake risk assessments on their other major tier one and two suppliers in 2024.

SUPPLY CHAIN STANDARDS

The ethos of the Group is very clear whereby the Operations consider themselves as custodians of their assets and businesses, respecting the local laws and the environment

in which they operate. In that context, the Operations continue their efforts to grow and nurture their businesses in a sustainable way with respect for human rights as defined by the UN Guiding Principles on Business and Human Rights, the environment and the wider communities in which they operate. The Operations' relationships with their suppliers have their roots firmly embedded in this ethos. Respecting human rights and environmental issues in the supply chain is ultimately a suppliers' responsibility. However, as customers, the Operations play an active role in supplier development and communicate these expectations.

Whilst neither the Company nor the Group can guarantee that these supply chains are completely free of slavery, human trafficking or forced labour, we believe that the steps being taken by the Operations will give greater visibility of the employment practices of the supply chain network which in turn will allow the Company to ensure compliance with the Act.

IMPLEMENTATION

The Company will continue to oversee the implementation and monitoring of the Company's compliance with the Act.

The leadership of the individual Operations will take responsibility for managing slavery and human trafficking risks in their jurisdictions.

The Company's MSA statement will be posted on both the Business and Human Rights Resource Centre and Transparency in Supply Chains MSA registries. The Company has also registered the nominated contact on the Home Office's Modern Slavery Contact Database.

NEXT STEPS

Further training of the Company's key personnel.

Operations to undertake further risk assessments of the key tier two suppliers. In addition, agricultural operations to promote further training of the smallholders and outgrowers.

BOARD APPROVAL

This statement was approved by the Board of Camellia Plc on 25 April 2024