Modern Slavery Statement

Czarnikow Group Limited
and C.Czarnikow Limited

2024



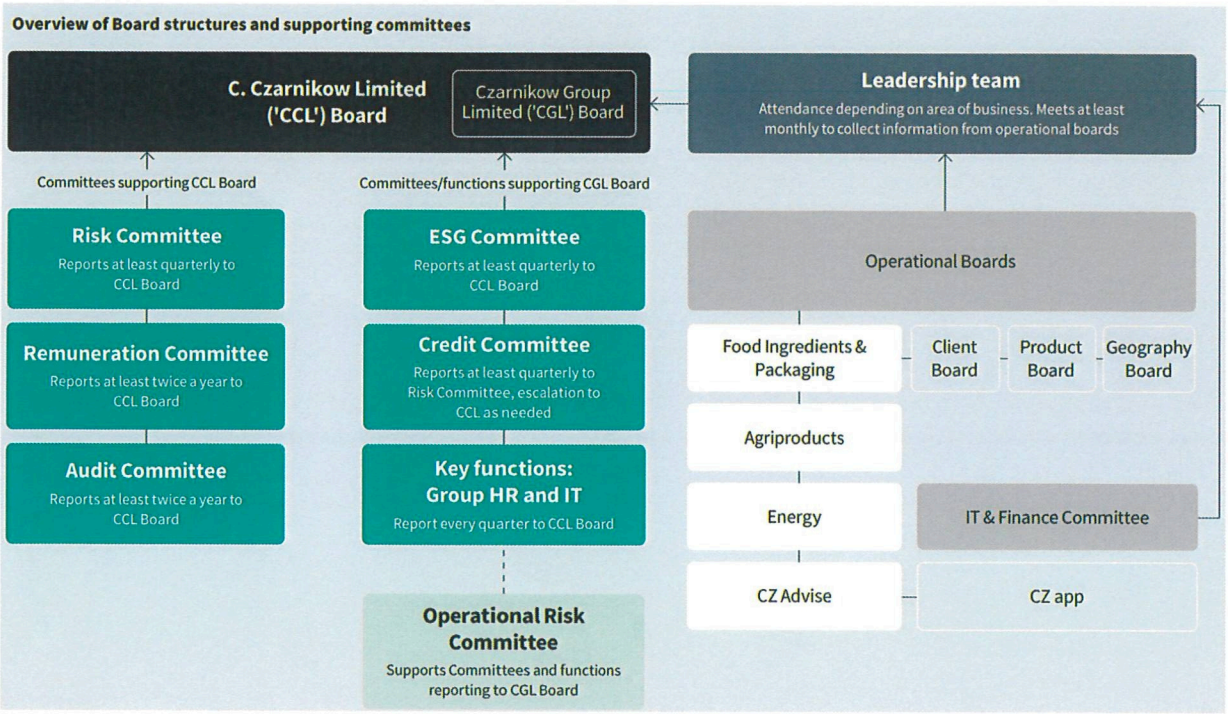
This Statement outlines actions undertaken by Czarnikow Group Limited and C. Czarnikow Limited, (jointly referred to as "CZ") during the financial year ended 31 December 2024. This is the eighth Statement for CZ under the UK Modern Slavery Act. It is issued in line with section 54 of the UK Modern Slavery Act 2015.

About CZ

CZ provides supply chain solutions across three core operational lines – CZ Advise, Agriproducts and Food Ingredients & Packaging. These include physical trading, liquidity solutions, freight, logistics and stock management, consultancy, market analysis and sustainability. CZ has over 450 employees globally and has main regional offices, offices, and local presences across Brazil and Southern Cone, Central and North America, Sub-Saharan Africa, North Africa, Europe, Middle East and Asia. CZ has a number of stakeholders which includes but is not limited to employees, logistics partners, financial partners, suppliers, local communities, shareholders, as well as our clients which includes over 200 farmers, more than 300 primary processors, and secondary processors, and over 500 food and beverage manufacturers.

Reporting and escalation

The ESG Committee and Compliance team are responsible for the day-to-day monitoring of modern slavery, the ultimate responsibility of monitoring lies with the CGL and CCL Board. The ESG Committee reports quarterly to the CCL Board on the number of ESG-related Incidents for Escalation to the CCL Board, the scope of reporting requirements includes incidents of modern slavery, if any.



Our commitment and efforts

As a UK business with international operations and supply chain, we understand the role CZ plays in the global effort to help prevent slavery and human trafficking from happening and are committed to supporting efforts to address these issues. In preparing this statement, we have adopted the definition of modern slavery outlined in the Modern Slavery Act 2015, which covers various forms of exploitation including, slavery, servitude, and forced labour, human trafficking, child labour, deceptive recruiting practices, debt bondage, sexual exploitation and forced marriage. CZ commits to continuous improvement in our processes relating to modern slavery and human trafficking, including developing a better understanding of the potential slavery and human trafficking risks at all levels of our supply chain and finding appropriate and practicable solutions to work with our suppliers to prevent these from occurring.

One of CZ's four values is acting responsibly and with integrity, as stated in the latest annual report. We always aim to act professionally, taking responsibility for our actions and treating others with respect and as equals.

We promote environmentally, socially, and economically responsible actions across our business. Taking steps to prevent modern slavery and human trafficking in our business and supply chain aligns with our broader goal of being a responsible business and acting with integrity.

CZ sources sugar, ingredients and packaging from many locations and from numerous suppliers and the company recognises that in some of these countries the possible risk of slavery and human trafficking is higher. CZ has zero tolerance for slavery and human trafficking. CZ actively complies with all applicable laws and regulations and the same is expected from our suppliers. Any trading relationship with a supplier which does not respect our commitment outlined in this statement will be reassessed and, where appropriate, actions to suspend the relationship may be taken.

Our commitment to zero tolerance for slavery and human trafficking is evidenced through the following steps:

- Due Diligence Procedures applied to assess and mitigate risk in the supply chain. CZ conducts due diligence on all counterparties we deal with. Our 'Know Your Client' compliance procedure is conducted before engaging with any new counterparty and includes due diligence checks of the human rights records of each potential partner. Any red flags are escalated to management as they appear, with our CEO making the final decision. All existing counterparties are also reviewed as part of our standard compliance procedures. Screening is carried out against global law and regulatory enforcement lists, which includes monitoring of sustainability and human rights practices.
- In 2024, the ESG Committee worked with the Quality team to develop an ESG self-assessment questionnaire that was sent to over 50 of CZ's core ingredient suppliers (including fruit, nuts and sugar) who are not VIVE participants. The questionnaire covers vulnerable groups rights (women, children, migrants, seasonal workers), workers' rights and local communities' rights.

- Participants on the VIVE Sustainable Supply Programme are subject to comprehensive onsite verification audits which covers criteria on modern slavery, governance, policies and procedures from the VIVE programme 'People' pillar.
- CZ employees can voice any concerns, including those regarding slavery and human trafficking, by following the Whistleblowing policy and the Adverse ESG-Related Event Response Procedure, available to all employees on the company's Intranet. CZ complies with UK Health and Safety legislation and all other relevant local regulations and provides a safe working environment for all its employees.
- All employees in the UK and global offices complete mandatory training focused on the risk of modern slavery in our supply chains. This forms part of annual compliance training. The training addresses modern slavery in a scenario-based question to employees, deepening their knowledge on how to recognise modern slavery in day-to-day work life.

Operating sustainable supply chains

At CZ, we work with all our clients to promote and support responsible and sustainable supply chains. CZ is a member of Sedex and Ecovadis and will support clients and stakeholders on all other initiatives. We also encourage clients to join our VIVE Sustainable Supply Programme which includes 30 VIVE participants and 81 Buyers Supporting VIVE. More details about the VIVE programme can be found on a dedicated website.

Actions taken

Every year, we seek to strengthen our efforts and deepen our understanding of ways to tackle modern slavery, and we are proud of the steps we have taken so far.

Since the last statement, we have introduced several procedures, policies and statements to strengthen our procedures to raise awareness amongst employees of modern slavery and along our supply chain, these include:

- Adverse ESG-Related Event Response Procedure (internal). This outlines to all employees the steps to take for adverse ESG-related events to be escalated to management as they appear.

- Business Code of Conduct (available on our website). This is acknowledged by all new employees when they are onboarded.
- Anti-slavery and Human Trafficking Policy (internal). The purpose of this policy is to set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking and to provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

In 2024, we also conducted an 'All Hands' presentation to further raise awareness of modern slavery and provide further training to employees on how to escalate any potential cases through the whistleblowing procedure and the Adverse ESG-related Disaster Response Procedure.

Future steps

We will review our actions and their effectiveness in the new financial year and take any steps we consider appropriate to further enhance our policies and procedures. Furthermore, we will continue to improve our understanding of potential modern slavery risks by training our employees. In FY 2025, we plan to conduct a more-in depth modern slavery risk assessment along the supply chain to further identify and understand the priority regions and products of highest risk. From 2025, the new-product approval process will include an ESG assessment, as part of this process we will consider modern slavery risk.

This statement has been approved by the Board Members of all reporting entities covered by this Statement on the 18th of June 2025 and is available on our website at www.czarnikow.com.



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Julian Randles, CFO

Date: 25.6.2025