



CCL & CGL Modern Slavery Statement

2026



CCL & CGL Modern Slavery Statement 2026

Introduction

This statement outlines actions undertaken to address modern slavery risk by C. Czarnikow Limited and Czarnikow Group Limited (jointly referred to as “CZ”) during the financial year which ended 31 December 2025. This is the ninth statement for CZ and is issued in line with section 54 of the UK Modern Slavery Act 2015.

As a UK business with international operations and supply chains, we recognise the role CZ can play in the global effort to prevent slavery and human trafficking and are committed to supporting efforts to address these issues. CZ has zero tolerance for slavery and human trafficking. CZ actively complies with all applicable laws and regulations and the same is expected of our suppliers.

CZ’s business and supply chain

CZ has a rich history in commodities trading, logistics and price risk management and currently offers a wide range of supply chain services. In the past, these were offered across three core operational lines CZ Advise, CZ Agriproducts and CZ Food Ingredients & Packaging. In 2025, CZ aggregated these operational lines into One Platform, our group-wide organisational structure bringing all operations into a single, scalable model. Services include physical trading of raw materials, liquidity solutions, freight, logistics and stock management, consultancy, market analysis and sustainability. In 2025 CZ’s product portfolio included 75 products, such as raw and refined sugar, grains, nuts and seeds, sweeteners, fruit, dairy, additives, packaging, raw materials and biomass.

CZ’s supply chains are complex networks. We directly engage with clients whose integrated operations span multiple manufacturing stages, and we work with suppliers of the products we trade as part of our procurement services. We also engage directly with stakeholders outside of the supply chains in which we operate who are instrumental in supporting our services. CZ’s stakeholders include, but are not limited to, employees, logistics and storage partners, financial and insurance partners, shareholders, local communities, as well as our clients and suppliers. Stakeholders include over 200 farmers, more than 300 primary and secondary processors, and over 500 food and beverage manufacturers. CZ’s visibility across the supply chain is strongest at direct supplier level; insight into labour practices beyond tier-1 suppliers varies by region and commodity and remains an area for ongoing improvement.

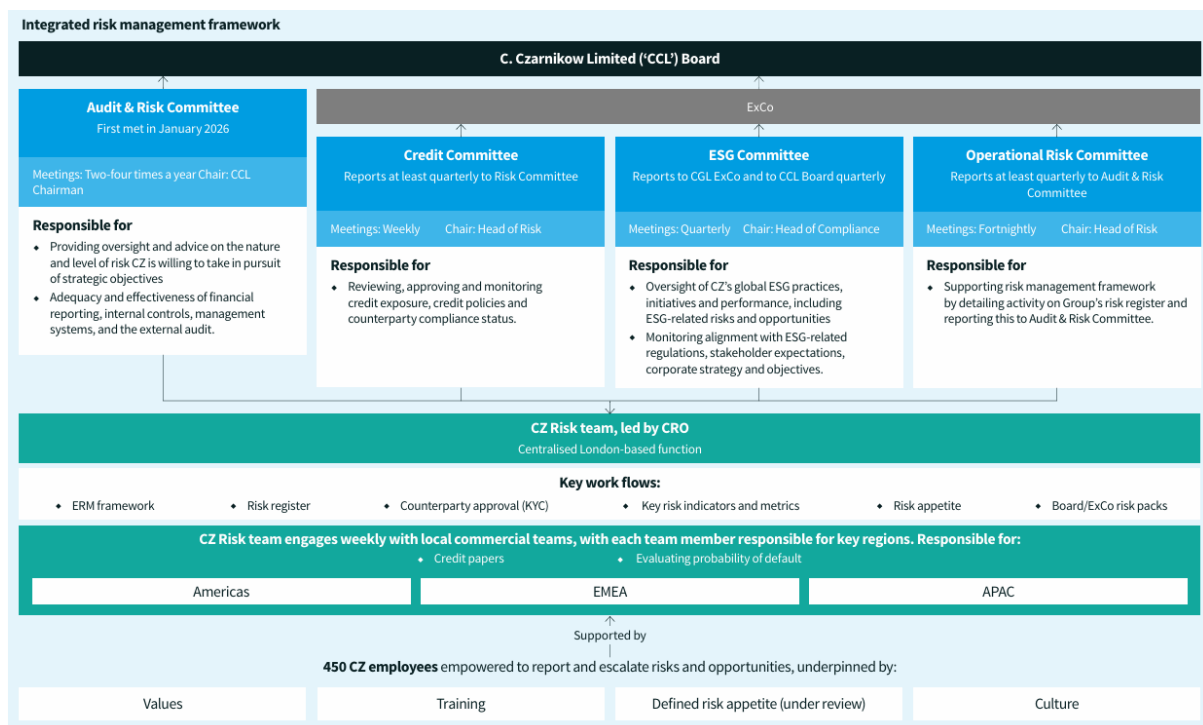


CZ has over 400 employees globally and has 26 registered entities across 20 countries. Employees are based across 13 offices and local presences spanning Brazil and the Southern Cone, Central and North America, Sub-Saharan Africa, North Africa, Europe, the Middle East and Asia.

Governance and policies

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

See CZ's risk management framework below:



CZ has a number of policies that are related to modern slavery in addition to this annual statement. We have a Business Code of Conduct which outlines to employees the ethical and social responsibilities CZ expects them to adhere to. In the past year we have also introduced two new policies that relate to modern slavery - The Anti-Slavery and Human Trafficking Policy and a Supplier Code of Conduct. The Anti-Slavery and Human Trafficking Policy sets out responsibilities for all employees in observing and upholding CZ's position on modern slavery and human trafficking prevention. This includes guidance on how to spot and report concerns. The Supplier Code of Conduct outlines CZ's ethical and social expectations to suppliers, including that suppliers must not engage with any form of slavery or forced labour.



Modern slavery-related policies are communicated to all CZ employees via the intranet and included within relevant training on an annual basis. Public policies are shared with stakeholders externally through CZ's website, linked [here](#). Compliance with policies is monitored by the Compliance team and all policies are reviewed and updated where necessary on an annual basis.

CZ complies with applicable labour laws on pay, working hours and employment conditions across all jurisdictions in which it operates. CZ also complies with UK health and safety legislation and all other relevant local regulations, providing a safe working environment for its employees.

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, which are both available to all employees on the company's Intranet.

Assessment and management of modern slavery risk

In 2025, CZ undertook desk-based research to identify potential modern slavery risks. To do this we utilised the Social Responsibility Alliance's publicly available Slavery and Trafficking Risk Template (STRT). The STRT supports organisations with compliance efforts under all major supply-chain-related slavery, human trafficking and child labour regulations. It is a standard survey which can be used to collect and share risk and compliance-related data across supply chains.

The STRT includes a list of 'goods of potential concern' and their associated source countries which have been known to be produced by child labour or forced labour or have been known to be produced with inputs of child labour or forced labour in violation of international standards according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).

For our STRT analysis conducted in 2025 CZ focused on sugarcane and sugar beet as these products fall within CZ's top traded product category - sugar. CZ recognises that both sugarcane and sugar beet are identified as 'goods of potential concern' by ILAB. The global sugarcane sector also faces elevated human rights risks due to its reliance on labour-intensive, seasonal work across key production activities.

Results from the 2025 STRT analysis show that although CZ does not produce sugarcane or beet from countries listed on the STRT, we do source sugarcane from ten countries identified by ILAB and must be alert to potential risks in these regions. This analysis was conducted in 2025 and based on 2024 sourcing data.



CZ's sugar business is subject to CZ's due diligence processes and if modern slavery risks are identified through this, the Adverse ESG-Related Event Response Procedure will be implemented. If potential risks are identified associated counterparties are prioritisation for ESG-related questionnaires to ensure processes are in place to prevent modern slavery. CZ plans to continue to develop its understanding of potential risks within the supply chains in which they operate in the coming years, including through conducting annual re-assessments of relevant products against the STRT.

CZ also conducts a supplier-based questionnaire to identify and understand potential risks across the supply chain in which the company operates. In 2025, the ESG Committee and Quality team completed the first round of CZ's ESG Data Capture Questionnaire which forms part of the Quality team's annual review of existing core suppliers who are not VIVE participants. The assessment covers the rights of vulnerable groups (women, children, migrants, seasonal workers), workers and local communities. This is a self-assessment questionnaire and desk-based analysis. Completion rate was 66% and there were no escalations. CZ's core suppliers will be prompted to complete the ESG Data Capture Questionnaire on an annual basis which shall be reviewed annually to corroborate current practices, and to adapt if changes are required.

Furthermore, in 2025, CZ introduced to its already established product approval process an ESG review. Undertaken by the Compliance team, new products put forward for approval are reviewed for potential ESG risks, including risks of modern slavery. If such risks are identified, engagement with suppliers and clients to ensure mitigation controls are in place are taken where possible. Potential risks are escalated through the Ops Risk Committee.

On the VIVE Sustainable Supply Programme, a globally recognised continuous improvement sustainability programme which is jointly owned by CZ and Intellync (AB Agri LTD), participants are subject to comprehensive onsite verification audits which cover criteria on modern slavery, governance, policies and procedures under the VIVE programme's 'People' pillar. VIVE is benchmarked against major sustainability initiatives and CZ encourage clients and their suppliers to join the VIVE Sustainable Supply Programme.

Due diligence in relation to modern slavery

CZ conducts due diligence on all counterparties we deal with as a key measure to mitigate risks and to ensure compliance with applicable laws and regulations, including due diligence checks of the human rights records of each potential partner. The due diligence checks are conducted in accordance with the internal CZ Counterparty Due Diligence Procedure, which was updated in 2025, and are performed both prior to the provision of goods or services and on an ongoing basis throughout the business relationship. All counterparties and related parties are screened against global law-enforcement and regulatory lists, which



includes monitoring of human rights practices, using the LSEG World-Check One database. Any red flags are promptly escalated to the Chief Risk Officer.

CZ is also a member of Sedex and Ecovadis which provide platforms for engaging with suppliers and clients on ethical and sustainability topics. At present, our use of these platforms is limited to information sharing and initial supplier engagement where requested.

CZ has established procedures to ensure that concerns raised are investigated. As part of the ESG-Related Adverse Event Response Procedure and Whistleblowing Policy, senior management (CGL Board Members and Managing Directors) have final responsibility to make the relevant decision and sign-off on an aligned response according to UK Government Guidance. This includes determining the appropriate action for modern slavery incidents. Any trading relationship with a supplier which does not respect the commitments outlined in this statement, will be reassessed and, where appropriate, actions to suspend the relationship may be taken.

Training

Annually, all CZ employees in the UK and global offices complete mandatory training focused on the risk of modern slavery in the supply chains in which the company operates. This year, we enhanced our existing compliance training programme by introducing mandatory ESG training to further embed awareness of modern slavery prevention within our broader governance and sustainability framework. This internally developed training was rolled out to 466 employees and involved considering a real-world example to demonstrate the risk of modern slavery in global supply chains, while learning about the escalation process that employees can take if risks are identified. ESG training will now be updated annually and will be a requirement for all employees.

Furthermore, to mark the EU's Anti-Slavery Week 2025, internally developed resources were shared with over 250 employees across our London, São Paulo, and Thailand offices, which included sharing practical steps individuals can take to identify and respond to risks alongside multiple case studies on the initiatives our client's conduct to help prevent modern slavery. As part of this, a modern slavery awareness quiz was shared, where employees could test their understanding of the shared resources and CZ's policies on modern slavery prevention.

CZ's ESG Committee also held its first ESG All Hands to raise awareness of the ESG committee and its initiatives across the company. This included a case study from the media exemplifying how a modern slavery incident



can occur within supply chains and underscoring why human rights and ethical conduct is of paramount importance to CZ.

Monitoring and evaluation

In 2025 CZ's ESG Committee worked to improve data capture for ESG-related metrics. These metrics, including those relating to human rights, grievance impacts and modern slavery, are reported in CZ's latest annual report on p.26, linked [here](#).

Formal goals related to modern slavery prevention have not yet been set, however, we do monitor modern-slavery related training and the number of assigned core suppliers who complete the ESG Data Capture Questionnaire. The baseline figures for these metrics in 2025 were:

- 66% response rate for core suppliers assigned CZ's ESG Data Capture Questionnaire
- 88% completion rate for ESG annual mandatory training

We aim to continuously improve these baseline figures by following up with our suppliers and monitoring employee activity.

The Compliance Team also developed internal KPIs in 2025 which includes KPIs related to mandatory training completion and the development of role-specific training.

Importantly, at CZ we work with all our clients to promote and support responsible and sustainable supply chains. CZ support clients and stakeholders with sustainability initiatives and encourage clients to join the VIVE Sustainable Supply Programme. At the end of 2025, across 17 countries, there were 40 VIVE participants and 100+ Buyers Supporting VIVE. More details about the VIVE programme can be found on their dedicated website, linked [here](#).

CZ commits to continuous improvement in our processes relating to modern slavery and human trafficking, including understanding and monitoring of the potential slavery and human trafficking risks within the supply chains in which we operate and finding appropriate and practicable solutions to work with our stakeholders to prevent these from occurring.

Future steps

CZ will review actions related to this statement and their effectiveness in the new financial year and take any steps considered appropriate to further enhance our policies and procedures.



Looking ahead, we anticipate embedding modern-slavery related policies into our supplier onboarding process, updating the STRT analysis of sugarcane and sugar beet on an annual basis and reviewing other products traded by CZ, if any, against ILAB's modern slavery related lists. We also aim to conduct another round of our data capture questionnaire and roll out role-specific/targeted training on modern slavery prevention for supplier-facing roles and seek to set a goal around this type of training in coming years.

This statement was approved by the Boards of CCL and CGL on 25th June 2026 for all reporting entities covered by this statement and is available on our website at www.czarnikow.com.


.....

William Rook, CEO

Date: 25/06/2026