MODERN SLAVERY STATEMENT

FOR FINANCIAL YEAR ENDED 31.12.2024

ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015

This statement sets out the steps that we have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

INTRODUCTION

Omnicom Trading LLP is a partnership engaged in trading agricultural commodities.

The business model is to perform back to back documentary trading.

Our major products are sunflower seed meal, rape seed meal, wheat bran. Additional products are wheat, corn, barley.

The purchasing of goods is usually done from certified suppliers mostly in the Black Sea region (Ukraine, Romania).

Our main destinations are European and Middle East countries, where we usually sell to local importers on wholesale basis.

Contract format is based on GAFTA standard models.

We operate under GTP standards (Good Trading Practice) – a detailed code developed by The European Feed and Food Ingredient Safety Certification (EFISC-GTP), a harmonized assurance scheme that includes requirements for the management system, (operational) prerequisite programmes, risk control (hazard analysis critical control points), documentation, withdrawal and traceability, suppliers selection procedure, human resources management and other core processes.

OUR POLICIES

We believe that modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit him for personal or commercial gain.

We have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Whereas complying with the legislation is the very minimum, we are implementing a comprehensive quality management system as per the highest European Good Trading Practice standards and combatting modern slavery is an integral part of it.

To ensure the best performance we have developed a detailed operating procedure and set of practices, which are followed by all the personnel at all steps of our operation. These are based on regulatory requirements and industry best practice. We will regularly measure compliance with these standards and enhance our operation and management system.

Our comprehensive risk assessment procedure is based on the principles of Hazard Analysis Critical Control Point (HACCP) and insures all practicable due diligence in our operation.

We have a dedicated compliance team led by our Quality Manager.

Management is committed to make available all the necessary means and resources towards implementing the comprehensive control system across our operation and communicating our policies and standards to all employees, combatting slavery and human trafficking being among major points.

SUPPLY CHAINS

All our suppliers are rigorously selected, assessed and re-assessed. All details on those evaluations are written in the relevant purchase procedure that makes a part of the company's quality management system developed under GTP standards.

We operate a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on site audits which include a review of working conditions where applicable. Our anti-slavery policy forms part of the terms to be stated before a contract with a supplier is concluded and the suppliers are required to confirm that no part of their business operations contradicts this policy, that they have taken steps to eradicate modern slavery within their business and they hold their own suppliers to account over modern slavery.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our operation or supply chain.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from:

- employees
- the public
- law enforcement agencies

to indicate that modern slavery practices have been identified.

This statement was approved by the Board of Directors on April 30, 2025



Director of
Omega Agri Resources Ltd.
Designated Member of
Omnicom Trading LLP