

Position Statement on Human Rights

ofi **Group Limited**





Our position

We are acutely aware of the risk of human rights issues in our global operations and supply chains. In order to supply our food ingredients and solutions to our global customer base, we rely on the ability to source agricultural commodities from millions of farmers, many of them smallholders.

We condemn illegal and unacceptable practices forced labor and child labor¹, gender-based violence, and human trafficking throughout our operations and supply chains. Our local and global teams engage with suppliers, customers, civil society, governments, and communities to seek to identify and mitigate the risk of human rights impacts in our own operations and across our value chains.

I. Policies and commitment

Our policies are reflective of the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the Women's Empowerment Principles. As part of the Olam Group, we have also been a signatory to the UN Global Compact since 2016, noting Principle 4 "Businesses should uphold the elimination of all forms of forced and compulsory labor".

ofi's Code of Conduct sets out the principles by which we conduct our business, engage with our stakeholders, and prohibit child labor and any form of forced labor. All **ofi** employees are expected to commit to and uphold the standards set out in the Code of Conduct and can report breaches or raise serious concerns to their respective manager, country leadership team, Human Resources or Legal, or through **ofi's** [anonymous reporting line](#) without fear of retaliation.

The **ofi** Supplier Principles and Agri-Supplier Code (ASC) stipulate the human rights standards we expect our suppliers and business partners to uphold. We engage and train suppliers on the topics covered in the ASC, including child labor, forced labor, respect and non-discrimination and the requirement that suppliers provide access to a process for employees, farmer group members and local communities to raise grievances without fear of retaliation. Where supplier non-compliance with the ASC is identified, we have developed guidance for origin teams to follow to know when they should engage with the supplier to put in place corrective action plans and when immediate exclusion might be needed.

We regularly review and update our policies to reflect the changing landscape, with input from in-house experts and external stakeholders.

II. Assessing actual and potential human rights risks

In accordance with the UNGPs, **ofi** carries out risk assessments to identify the most salient human rights risks and where they are most likely to occur, to tailor interventions accordingly. In partnership with Wageningen University and Research (WUR), we have developed commodity-specific risk mapping across eight human rights principles, including: forced labor, child labor, violence and harassment, discrimination and unfair remuneration, for the countries we source from. Understanding where human rights risks are the highest helps us decide where we should

¹ Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development (work that interferes with schooling or is hazardous) (ILO convention 138). The worst forms of child labor include children being enslaved, separated from their families, exposed to serious hazards and illnesses, and/or left to fend for themselves on the streets of large cities – often at a very early age



look to carry out in-depth assessments to identify the root causes in that particular context. It also allows us to prioritise actions on the ground to mitigate the risk of human rights infringements (including modern slavery practices) and carry out heightened monitoring systems where appropriate.

In supply chains that have been identified as high risk for certain human rights issues, we aim to carry out in-depth assessments to better understand how those risks manifest themselves in our supply chain, and what interventions we can put in place to address them. For example, the Fair Labor Association has evaluated all high-risk cocoa supply chains and the Turkey hazelnut supply chains, mapping working conditions and labor risks and partnered with us to review our corrective action plans in order to strengthen our systems and the responses available to those businesses on the ground.

III. Addressing human rights risks

Human rights issues are both challenging to identify and complex to prevent and mitigate. We are aware that solutions to human rights issues require strong and concerted collaboration between the public and private sectors, and, as such, are continuously working to build and strengthen these partnerships. Through our membership of the World Business Council for Sustainable Development (WBCSD), FLA, the International Cocoa Initiative (ICI), the ILO Child Labor Platform (ILO CLP) and other sector-wide initiatives, we join other global business leaders, NGOs, governments and other key stakeholders to raise the bar on human rights and positively impact the lives of the world's most vulnerable people.

A. A safe, equitable and supportive workplace

ofi believes in maintaining a safe and healthy work environment and to treating all employees with dignity and fairness. We do not tolerate any form of harassment or discrimination in the workplace.

We provide equal employment opportunities based on merit and performance without regard to the employee's race, color, religion, sex, age, national origin, sexual orientation, disability, citizenship status or marital status.

ofi is committed to complying with all applicable laws on compensation, including minimum wage. We respect freedom of association and workers have the right to join or to refrain from joining representative associations of their choice, and to bargain collectively.

Diversity and inclusion

At **ofi** we value diversity and we believe inclusion and collaboration amongst different people with diverse backgrounds, experiences, and expertise offers unique value to our business. We strive to promote diversity and inclusiveness at all levels in the organization, and we are focused on creating an enabling environment that allows every individual to reach their full potential. **ofi** also has an Inclusion, Diversity and Equity ("IDE") governance framework. Each of our regional teams has an IDE Council that reports to the Corporate Leadership Team. The IDE framework provides a strategy and actions on diversity, equity and inclusion for the **ofi** Group to follow.

Nutrition and health

At **ofi** we believe that good nutrition is a key driver for both employee wellbeing and thriving businesses. In the workplace we follow the standards outlined in our Fair Employment Policy on health and nutrition, as well as company-wide Code of Practice for safe Water, Sanitation and Hygiene (WASH) and food safety across our operations. We are actively rolling out the Workforce Nutrition Alliance's self-assessment scorecard to assess and continuously improve the nutrition support provided to employees across four pillars: healthy food at work, nutrition education, nutrition-focused health checks, and breastfeeding support. In September 2024, **ofi** – recognized



as a Lighthouse Leader on breastfeeding support by the Workforce Nutrition Alliance - was invited as guest speaker in their Lighthouse Leader webinar series to discuss the importance of this topic. We are aiming for 100% of our primary workforce to have access to nutrition support by 2030.

B. Addressing human rights issues in our supply chains

Our local and global teams collaborate with customers, governments, civil society and other partners to develop supply chains that respect people and human rights, where no children or adults are subject to illegal, forced, abusive or dangerous labor practices. We recognize the importance of working with our suppliers to develop supply chains that respect these rights. **ofi** has rolled out the Agri Supplier Code (ASC) to the majority of our global direct supply chain and an increasing number of indirect suppliers. Where supplier non-compliance with the ASC is identified, we have developed guidance for origin teams to follow to know when they should engage with the supplier to put in place corrective action plans and when immediate exclusion might be needed.

Supporting communities

We know that efforts to address human rights challenges in supply chains must consider the social and economic context in which farmers and their families live, in order to tackle the root causes of human rights infringements. For this reason, **ofi** works with international expert organizations, donors and customers to implement multi-year projects and programs to improve livelihoods, inclusion, living incomes and wages. We respect customary and legal tenure, and access rights of indigenous people, as well as local and cultural traditions. We are committed to the principle of Free, Prior and Informed Consent (FPIC) which is outlined in our [Living Landscapes Policy](#).

Children's rights

In supply chains where there is a high-risk of child labor, we strive to implement digital or non-digital systems to monitor and remediate, where possible, cases of child labor, including forced child labor. Our local teams have rolled out **ofi**'s Child Labor Monitoring and Remediation System (CLMRS), to cover the risks of child labor across multiple countries in cocoa, coffee and nuts supply chains, with a roll-out in progress to more priority origins.

ofi is one of the first agri-businesses to be affiliated with the FLA which we joined in 2012, to strengthen processes and monitoring systems in our cocoa supply chain and in our hazelnuts supply chain in Turkey. We are taking action to protect children from child labour by tackling child labour's root causes, including improving the livelihoods of farmers and their families and supporting better access to education.

We also recognise that overcoming these complex challenges ultimately requires collaboration with others, including customers, governments and civil society. We participate in several multi-stakeholder initiatives to address these challenges collectively and mitigate the risk of forced labor from occurring, including the International Cocoa Initiative, the Child Learning and Education Facility ("CLEF"), the ILO CLP, the WBCSD, the IDH Living Income Roadmap, the Living Income Community of Practice, and are a Global Living Wage Corporate sponsor.

Empowering women

As a signatory to the Women's Empowerment Principles (WEP) we are also focused on improving opportunities for women across our supply chains, through programs and initiatives that offer gender-inclusive training, educational opportunities, access to finance, income generating and diversification activities, as well as boosting women's representation and leadership in cooperatives and farmer groups.

In many places globally, women are disadvantaged with less access to resources, training, and economic opportunities, yet make up a large part of the agricultural labour force. We strive to



support women in farming communities, with specific targets in our Choices for Change sustainability strategy.

Our sustainability team has developed *The Women's Inclusion Toolkit* to guide efforts to improve women's inclusion in agricultural supply chains where they play a significant role as landowners, family workers, hired workers, extension agents and traders. The Toolkit helps field teams identify opportunities across four key pillars of action: training advisory and handholding; access to infrastructure, services and inputs; access to finance and markets; and community development initiatives.

Nutrition and health

At **ofi** we know that good nutrition and health are essential for individuals and communities to thrive, and that poor nutrition and health outcomes are inextricably linked to other social and economic challenges. Many farming communities where we operate experience high rates of malnutrition and have limited access to clean water, sanitation and hygiene and quality healthcare. Farmer households cannot always grow sufficient food or do not have the means to invest in nutritious food or health and nutrition services, further hampering productivity and earning potential. Compounding this, in many communities, households are not equipped with the necessary knowledge to contribute to improved nutrition and health outcomes.

In line with the aims of UN Sustainable Development Goals 2 and 3, **ofi**'s initiatives to improve nutrition and health in many of the communities where we operate include the **ofi** Healthy Living Campaign (OHL), facilitating access to screening and other healthcare services, supporting food crop production, building waterpoints, refurbishing local hospitals, and sensitizing communities on good nutrition and disease prevention. In 2025, **ofi** won the Edie 'Social Sustainability Project of the Year' award for the Infant Malnutrition System Alert app which our cashew team is rolling out in Cote d'Ivoire, a key risk origin for infant nutrition.

IV. Measures taken to prevent and remediate identified cases of Human Rights issues

Where child labor is a risk in the supply chain, **ofi** teams and partners on the ground may implement a range of prevention and remediation measures in the communities where we have a local presence. These include activities to train and sensitise households or facilitate children's access to education or help to address the root causes of child labor. Some examples of prevention and remediation actions include facilitation with local government to issue children birth certificates, provide school kits and materials, school fees sponsorship, facilitating access to bridge schools, kindergartens or vocational training and refurbishment of school infrastructure. In 2024, our coffee teams were recognised at the World Coffee Innovation Awards for the kindergartens they established in Guatemala, Nicaragua and Honduras for children of coffee farming households.

In addition, teams also help to address the root causes of child labor through our programmes to address the living incomes of farmers and empowerment of women through Village Savings and Loans Associations.

In cases where forced labor were to be identified in our supply chains or reported to us, we would aim to support the victims in cooperation with other stakeholders as appropriate, and track the status of case remediation until its resolution. Remediation actions could include referral to local institutions or partners with expertise in handling such cases. **ofi** is committed to respecting a victim-centred approach to such cases if they were to occur in our supply chain.

Stakeholder feedback is essential to ensure we are constantly improving, upholding best practices, and increasing transparency in our supply chains. We have established a cross-commodity complaints mechanism that is used both throughout our own operations and with



third-party suppliers to ensure concerns about breaches of our policies can be raised confidentially. All grievances are logged, investigated and acted upon, with status updates provided to complainants.

We continue to raise awareness about human rights amongst employees, suppliers, farmers and workers and encourage everyone to raise concerns, without retribution.

V. Reporting on our actions to protect human rights

We are committed to reporting on our activities to prevent and remediate human rights risks in the Olam Annual Report, commodity-specific annual progress reports including Cocoa Compass, Coffee LENS and Nut Trails, the Additional Sustainability Information Report, publicly available FLA assessments of our cocoa and hazelnut supply chains, and to national and multi-stakeholder initiatives such as the Cocoa Forests initiative and the International Cocoa Initiative. From 2026, we will be reporting annually on our dedicated targets related to protecting human rights as set out in **ofi**'s overarching sustainability strategy Choices for Change. This includes the target for all identified human rights cases to receive remediation actions by 2030, with a 2025 milestone for all supply chains having systems in place to address human rights.

IV. Governance

The Chief Sustainability Officer, supported by the **ofi** Sustainability and Human Resources functions, ensures that all employees, businesses, and other functions across geographical areas are clear about their role in respecting human rights, implement necessary measures within our own operations, communicate our requirements to suppliers, monitor the implementation and outcome of these measures, and maintain and update the relevant Policies and Codes. Top-level oversight is provided by the **ofi** Board and its relevant committees. Our IDE Council, cochaired by the **ofi** Group CEO, also leads and oversees our strategy and actions on diversity, equality, and inclusion across the Group.