

Modern Slavery and Human Trafficking Statement 2025

24 June 2025

This Modern Slavery and Human Trafficking Statement (the “**Statement**”) is made by **OFI Group Limited**¹ on behalf of our wholly owned subsidiaries and broader affiliates in the **United Kingdom**², **United States of America**³ and **Australia**⁴, together the “**Reporting Entities**” (“**ofi**”, “**us**”, “**we**”, “**our**” or the “**Group**”).

ofi's (Olam Food Ingredients) approach to modern slavery and human trafficking is consistent across the Group, with policies, approach, risk management, actions and governance being led at a corporate level, which are then tailored, adapted and localized by **ofi**'s subsidiaries as required. As such, this Statement addresses the actions taken by all Reporting Entities.

This statement is for the financial year ending 31 December 2024.

Due to **ofi**'s operational footprint, **ofi** subsidiaries in other jurisdictions may meet thresholds to report under applicable legislation addressing similar subject matter in their country⁵. Where appropriate, this reporting is completed as required.

About **ofi** and our Supply Chains

ofi is part of the Olam Group of companies (<https://www.olamgroup.com>) which is a leading food and agri-business supplying food, ingredients, feed and fibre to over 22,000 customers worldwide. Olam Group's value chains span over 60 countries and include farming, processing, and distribution operations, as well as a sourcing network of an estimated 5 million farmers.

ofi is an operating group born out of the Olam Group, supplying food and beverage ingredients and solutions to customers worldwide. The Group consists of industry-leading businesses of cocoa, coffee, dairy, nuts, and spices, as well as a newly formed commercial platform focused on developing food and beverage solutions for our customers. **ofi** has a global value chain presence in ~50 countries including our own farming operations, farm-gate origination sourcing from approximately 2.4 million farmers, and more than 120 manufacturing facilities. As part of our purpose, to “*Be the change for good food and a*

¹ This Statement has been voluntarily prepared by OFI Group Limited on a consolidated basis on behalf of the Reporting Entities.

² Olam Europe Limited is the UK company that meets the thresholds to report against the UK Modern Slavery Act. It is a corporate office within **ofi** based in London.

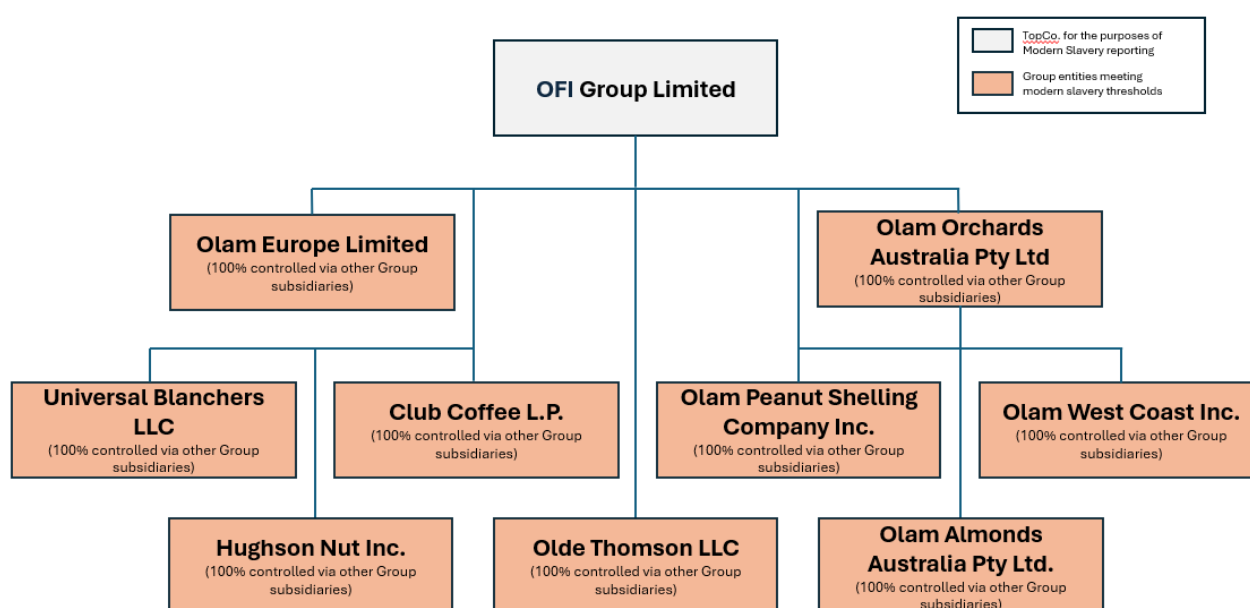
³ Universal Blanchers LLC, Olam West Coast Inc., Olam Peanut Shelling Company Inc., Hughson Nut Inc. And Olde Thomson LLC are the US companies that meet the thresholds to report against the California Transparency in Supply Chains Act.

⁴ Olam Orchards Australia Pty Ltd (“Olam Australia”) is the Australian company that meets the thresholds to report against the Modern Slavery Act 2018.

⁵ For example, Club Coffee L.P. is a Canadian entity that meets the thresholds to file a report in accordance with the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act.

healthy future," **ofi** can source, grow and manufacture ingredients that are good for farmers' livelihoods, for consumers' health and well-being, and for the world around us. See page 8 of this statement for further details in relation to the Australian operations of **ofi**.

ofi, through our group of companies, believes in maintaining a safe and healthy work environment, treating all employees with dignity and fairness, and respecting the rights of people and communities across our value chains. Below, the Group has provided a simplified breakdown of the group structure for the purposes of our Modern Slavery and Human Trafficking reporting. The Reporting Entities are all 100% controlled by **OFI Group Limited** via other 100% controlled group subsidiaries of **OFI Group Limited**.



The Group is highly aware of the risk of modern slavery and human trafficking in our business and supply chains, given the global presence of **ofi** and our diverse and fragmented agricultural supply chains, relying on millions of farmers, many of them smallholders.

The Group condemns illegal and unacceptable labor practices. **ofi's** local and global teams engage with suppliers, customers, civil society, governments, communities and individual farmers at risk, to seek to identify and mitigate the risk of modern slavery across our value chains.

Under the Olam Group, **ofi** is a signatory to the UN Global Compact and as such has put in place a robust Human Rights Due Diligence Process to monitor and address modern slavery and human trafficking.

Olam Group was one of the first agri-businesses to be affiliated with the Fair Labor Association (FLA), which it joined in 2012, to strengthen processes and monitoring systems where most needed. **ofi** has continued with this affiliation.

The **ofi** Agri-Supplier Code (ASC), Supplier Principles and Fair Employment Policies cover requirements related to preventing and addressing modern slavery risks within **ofi** workplaces and in the Group's supply chains. In 2024, **ofi** also launched *Choices for Change*,

our global sustainability strategy which includes our target to establish systems to address human rights issues in all supply chains by the end of 2025.

Risks Identification

ofi's risk identification process for assessing modern slavery risk involves a structured approach to identifying, evaluating, and mitigating risks across our supply chain. The Group considers factors such as geography, industry, labor conditions, and supplier relationships, and engages with stakeholders, utilizing third-party data to identify high-risk areas.

Through a partnership led by [Wageningen University Research](#) (WUR), **ofi** has developed commodity specific risk scores for eight human rights principles: forced labor, child labor, violence and harassment, discrimination, unfair remuneration, occupational health and safety, freedom of association and the right to collective bargaining. This process has allowed **ofi** to determine country-product risk scores for the products it sources to provide an overall understanding of risk levels in specific countries. The country-product risk scores enable **ofi** to prioritize in-depth assessments and actions to mitigate human rights risks, including modern slavery, and implement heightened monitoring where needed. This system has been in operation since 2020 and **ofi**'s risk scores were updated with improved methodologies in 2024.

In addition, **ofi** enables the FLA to carry out annual assessments of the Group's policies, strategies and targets and supports the FLA in its conduct of field assessments of the Group's cocoa and nuts supply chains, its assessment of **ofi**'s monitoring systems and its identification of any non-compliance with labor standards. Building on the work with WUR to identify **ofi**'s high-risk locations, the FLA has evaluated all high-risk cocoa supply chains and the Turkey hazelnut supply chains, mapping working conditions and labor risks. They have also partnered with **ofi** to review the Group's corrective action plans to strengthen our systems and responses.

Based on the WUR risk scores, **ofi** teams will roll out additional risk identification and remediation systems on the ground, specifically **ofi**'s Child Labor Monitoring and Remediation System (CLMRS), which **ofi** developed on the recommendation of the FLA, and includes monitoring for forced child labor. CLMRS has been fully implemented in all nine of the Group's direct cocoa sourcing origins, two coffee origins and two nuts' origins. In 2024, nine additional coffee origins were digitally onboarded to the system and will begin implementation on the ground in 2025. The system will be expanded to more origins in 2025, based on the Group's risk mapping.

ofi also piloted a Forced Labor Monitoring and Remediation System (FLMRS) in two cocoa origins in 2024 based on the WUR risk scores. This effort will be scaled up to more origins in 2025, as relevant.

ofi's grievance mechanism *Speak Out*, which is implemented by an external, independent, third-party, was launched in 2024, supplementing previous whistleblowing processes for identifying grievances. *Speak Out* allows internal and external stakeholders to raise any suspected wrongdoing, including human rights issues, to **ofi**.

As part of our risk identification process, **ofi** requires all our suppliers to sign the ASC, which outlines the Group's requirements for social and environmental practices in supply chains. Following its implementation, **ofi** teams must implement a verification of supplier practices against the ASC. The ASC verification procedure was piloted in 2024 and will be

scaled up to more regions in 2025 to support farmers to improve performance against **ofi**'s standards. Where third-party verification is yet to be implemented, we are training **ofi** field teams and equipping them with the tools needed to conduct their own reviews.

Risk Mitigation Actions

ofi is committed to safeguarding human and children's rights. To this end, the Group has set itself specific human rights targets for 2025 and 2030 in our latest sustainability strategy [*Choices for Change*](#) publicly launched in 2024. This includes having systems in place by 2025 to identify, prevent and remediate child labor in all high-risk supply chains and to address human rights issues (including forced labor) in all supply chains, and to ensure by 2030 that all identified cases receive remediation actions.

To meet these targets, **ofi** has identified where human rights risks are the greatest within our supply chains, is implementing measures to prevent human rights abuses from occurring and is initiating remediation measures where needed.

Below, the Group has detailed the programs and initiatives implemented or continued during 2024 to help prevent and remediate modern slavery issues:

- **ofi** helped enhance farmer livelihoods by providing support such as training, agricultural inputs, credit and infrastructure to nearly 458,000 farmers within our global sourcing network. This includes supporting approximately 88,000 women and 12,000 youth. Supporting farmers to earn additional income reduces their need to resort to exploitative labor practices that could amount to forced labor.
- **ofi** supported more than 2,000 women with access to finance in cocoa supply chains, through extending membership to Village Savings and Loans Associations (VSLA). An independent evaluation by FLA reported a positive impact on the involvement of women in decision-making in the community and the household. It highlighted that VSLAs have improved its members' household income and saving habits which contributed to food and health expenses and supporting children's education. This was also reflected in the higher school enrolment rate of their children compared to non-VSLA members. Improved access to education and increased school enrolments can reduce the risks of child labor.
- **ofi** continued working with the NGO *100WEEKS*, helping coffee farmers in Uganda received weekly cash transfers and training to alleviate debt pressures and incentivise farm investment. According to the 2023 project survey, 80% of the participating famers found an additional income-generating activity with 78% saying the program helped increase their income, thus alleviating poverty which is one of the root causes of forced labor.
- **ofi** continued to participate in several multi-stakeholder initiatives to address human rights challenges collectively and mitigate the risk of forced labor from occurring, including: the International Cocoa Initiative, the Child Learning and Education Facility (CLEF), the International Labor Platform (ILO) Child Labor Platform (CLP), the World Business Council for Sustainable Development, the IDH Living Income Roadmap, the Living Income Community of Practice, and is a Global Living Wage Corporate sponsor.

- **ofi's** sustainability management system, [AtSource](#), offers the ability to track the social footprint of our products from the farmer to the factory gate. It includes social metrics aligned with the Global Reporting Initiative and the UN Sustainable Development Goals, including labor related metrics covering human rights, safe and decent work and diversity and inclusion. While *AtSource* does not track all farmers within **ofi's** extensive supply chain, every year more farmers are being added to those already monitored within the system. The *AtSource* scheme rules specify that all volumes supplied through *AtSource* should be verified by randomised, unannounced, third-party audits.

In **ofi's** own operations, the Chief Sustainability Officer and Chief Human Resources Officer, supported by the **ofi** Sustainability and HR functions, ensure all employees and functions understand their role in respecting human rights, implementing measures, communicating requirements to suppliers, and monitoring outcomes.

If confirmed cases of modern slavery are identified or reported to **ofi**, the Group aims to support the victims where possible in co-operation with other stakeholders as appropriate and track the status of case remediation until its resolution. **ofi** remediates cases through a range of actions including the provision of household sensitization, facilitation of birth certificates, school enrolment facilitation, access to childcare facilities, school refurbishments, and provision of school kits. **ofi** also works to address the root causes through livelihood activities for men and women farmer households, providing access to finance to women in farming households and providing nutrition and health support to improve household resilience. In addition, **ofi's** grievance mechanism *Speak Out* enables **ofi's** stakeholders to raise issues of misconduct and human rights infringements directly to the company. When cases are received, these are internally directed to the relevant departments and teams for investigation and resolution, with high-level oversight of case management maintained throughout the process.

ofi is committed to reporting on our activities to prevent and remediate human rights risks in the Olam Group Annual Report, commodity-specific annual **ofi** progress reports such as [Cocoa Compass](#), [Coffee LENS](#) and the [Nut Trail reports](#), Olam's [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. In addition, **ofi** reports against other industry reporting standards such as *Be Slavery Free's* Chocolate Scorecard for our cocoa supply chains.

Monitoring Effectiveness

ofi monitors the implementation and effectiveness of all our sustainability initiatives including interventions to address modern slavery risks in our operations and supply chains and reports accordingly across several publicly available documents listed above. The ASC verification process is also a way to measure the effectiveness of **ofi's** ASC engagement process with farmers.

Addressing child labor and detecting modern slavery across supply chains does not have a short-term solution as they are complex problems and a shared responsibility. It will take time for the Group's monitoring and remediation actions and processes to have the desired effect and drive real, systemic change. The effects of CLMRS and FLMRS are having positive outcomes, and **ofi** will continue to monitor this progress over the coming years. **ofi** reports

the number of cases of child labor identified and remediated through our CLMRS system in our product Impact Reports – for instance, Cocoa Compass reported in 2024 that 8,600 child labor cases were in the process of remediation in the previous year, with 42,000 cases addressed since 2018. The vast majority of these are cases of children working on family smallholder farms, normally remediated by facilitating access to schooling. In **ofi**'s cocoa business we have provided education support to 167,000 children since 2018.

Policies and Governance

The Group's policies are informed by 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, **ofi** has 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 the Group conducts business, engages with our stakeholders, and prohibits 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, Legal, or through the third party managed *Speak Out* anonymous reporting line without fear of retaliation.

The **ofi** Supplier Principles and ASC stipulate the human rights standards the Group expects our suppliers and business partners to uphold. **ofi** employees engage and train suppliers on the topics covered in the ASC, including forced labor and the requirement that suppliers establish a process to receive, review and investigate any grievances coming from employees, farmer group members and local communities. To facilitate better uptake and understanding of the ASC by farmers and suppliers with limited literacy, **ofi** has developed an illustrative version of the ASC and translated it into 17 different languages. Suppliers are also required to sign the ASC every year. Where supplier non-compliance with the ASC is identified, **ofi** has 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. In cases where a supplier is consistently found to be non-compliant, and does not demonstrate adequate effort to improve compliance, **ofi** reserves the right to suspend procurement of products coming from this supplier.

ofi has a robust policy framework to address and remediate instances of modern slavery in our own operations and our supply chains, if identified. Our ASC and our Fair Employment Policy are both aligned with international standards.

ofi regularly reviews and updates our policies to reflect the changing landscape, with input from in-house experts and external stakeholders.

For further information on the Group's policies, see the table with links to each policy included below.

Name of Policy	Date published/last reviewed
Fair Employment Policy	December 2024
Code of Conduct	November 2024
Agri Supplier Code	April 2024
Whistleblowing policy	April 2024
Supplier Principles	February 2024
SpeakOut Reporting Platform	January 2024
Living Landscapes Policy*	April 2018

**This is an Olam Group policy and is in the process of adoption by ofi*

ofi has been a member of the FLA since 2012. The FLA undertakes independent evaluations and publishes public reports of its findings on **ofi**'s cocoa and hazelnut supply chains globally.

Top-level oversight is provided by the **ofi** Board of Directors and its relevant committees, including the Sustainability and Governance committee and the Audit and Risk committee. **ofi** also has an Inclusion, Diversity and Equality (IDE) governance framework. Each of the Group's regional teams has an IDE Council that reports to the regional leadership team. The IDE framework provides a strategy and actions on diversity, equality and inclusion for the **ofi** Group to follow.

Training and Stakeholder Engagement

All **ofi** personnel, manager grade and above, must complete mandatory training on human rights, including modern slavery topics. In 2024, 100% of **ofi** managers were enrolled in the training. As of January 2025, 64% have completed the training. The training covers the following learnings:

- All relevant **ofi** policies, clarifying **ofi**'s position on various human rights standards.
- Introduction to the key human rights topics that are material to **ofi**'s supply chains - Child Labor, Forced Labor, Discrimination, Working Conditions (Wages, Working Hours and Health and Safety).
- Managerial responsibilities in ensuring human rights are respected within **ofi**'s operations and our supply chains.
- Key processes that managers are required to implement in **ofi**'s supply chains.

Country Specific – Australia

The following statements have been prepared to align with the requirements of the Modern Slavery Act 2018 and are specific to **ofi**'s Australian operations.

In preparing this Statement, the Group consulted with representatives from each of the Reporting Entities. Representatives were asked to provide input into how modern slavery and human trafficking is being addressed within their business and supply chains⁶. As stated above, **ofi**'s approach to modern slavery is consistent across the Group and, importantly, is supported and tailored by **ofi**'s business at local level as necessary.

ofi Australia has an established business growing, processing and trading almonds both locally and internationally. **ofi** operates approximately 15,000 hectares of almond orchards, across 13 farms in Victoria and New South Wales and has an almond processing facility located at Carwarp in Victoria. **ofi** Australia has its own established marketing and distribution network in all major almond consuming regions. It also operates a processing, packing and warehouse facility at West Melbourne in Victoria. Along with **ofi**'s products, this facility is used to source and process various other nut types. **ofi** Australia also imports and trades finished cocoa products, being cocoa powder, butter and liquor. **ofi** Australia has 237 employees located in our Melbourne offices and across the various orchards and facilities. **ofi** Australia has a global supply chain, encompassing both local and international suppliers as part of its direct and indirect procurement activities. Categories of suppliers include the following: raw materials (cocoa products produced from cocoa beans sourced from growers across various countries and processed at **ofi** facilities), logistics (e.g. freight, storage and handling, stevedoring and port terminal services, shipping), seasonal labor, packing products and site and plant related suppliers. Olam Orchards Australia Pty Ltd holds 100% of the share capital of Olam Almonds Australia Pty Ltd.

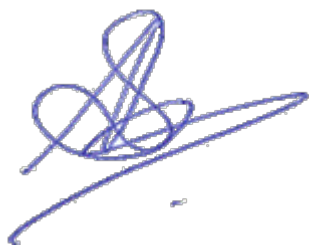
Our Commitment and the Year Ahead

ofi is committed to continue working with stakeholders from the public and private sectors to tackle discrimination, eliminate unsafe and illegal labor practices for children and adults, promote fairness and equality, and champion inclusion and diversity, while continuing to improve the livelihoods of farmers and communities.

To access previous versions of **ofi**'s Modern Slavery and Human Trafficking Statement, please [click here](#).

This Statement was approved by the Board of Directors of **OFI Group Limited** on behalf of the Reporting Entities on 7 May 2025.

⁶ For Olam Orchards Australia Pty Ltd ("Olam Australia"), consultation included representatives from entities owned and controlled by Olam Orchards Australia Pty Ltd.



Shekhar Anantharaman
Executive Director and Group CEO

OFI Group Limited

24 June 2025