

Modern Slavery and Human Trafficking Statement 2021

Dated: 21 June 2021

This statement is made by Olam International UK Limited on behalf of itself and its wholly owned subsidiaries including Olam Europe Limited (“Olam”, “us” or “we”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Statement”).

Olam International UK Ltd, is part of the Olam group of companies (www.olamgroup.com) which is a leading food and agri-business supplying food, ingredients, feed and fibre to 17,300 customers worldwide. Our value chain spans over 60 countries and includes farming, processing and distribution operations, as well as a sourcing network of an estimated five million farmers.

Doing business in an ethical, socially responsible and environmentally sustainable manner is embedded in every aspect of Olam’s business. We are committed to providing a workplace where all employees are treated with dignity and fairness, and to respecting the rights of people and communities where we operate. We have zero tolerance for slavery, forced labour or human trafficking in our organisation and our supply chains.

As a leader in global food and agriculture, we are engaging with suppliers, customers, civil society, governments, and communities to eliminate and prevent abuses across our value chains, and in the markets, where we operate and have influence.

Respecting labour and human rights

Respecting labour and human rights is an intrinsic part of Olam’s Purpose of Re-imagining Global Agriculture and Food Systems to enable prosperous farmers, thriving rural communities and healthy ecosystems to coexist.

We are committed to protecting human rights, providing a safe and healthy work environment where all employees are treated with dignity and fairness, and to respecting the rights of people and communities where we operate. We have zero tolerance for illegal and unacceptable practices such as forced labour, child labour, gender-based violence, and human trafficking in our operations and our supply chains. We engage with suppliers, customers, civil society, governments, and communities to identify, eliminate and prevent abuses across our value chains, and in the markets where we operate and have influence.

Our Sustainability Framework

Purpose	Re-imagining Global Agriculture and Food Systems									
Purpose Outcomes	Prosperous Farmers and Food Systems			Thriving Communities			Regeneration of the Living World			
Material Areas	Economic Opportunity	Safe and Decent Work	Education and Skills	Health and Nutrition	Diversity and Inclusion	Climate Action	Healthy Eco-systems	Healthy Soils	Water	Reduced Waste
Impact on UN SDGs	 	 		 	 	 	 	 		 
	  Enablers									
Policies Standards	Health and Safety		Quality and Food Safety			Labour		Living Landscapes		
Farmers	Olam Livelihood Charter									
Plantations	Olam Plantations, Concessions and Farms Code									
Suppliers	Supplier Code									
Factories and worksites	QEHS Standards									

Our [AtSource](#) sustainable sourcing platform, currently being implemented across our multiple supply chains, offers the ability to track the environmental and social footprint from the farmer group to the factory gate. It includes social and environmental metrics aligned with the Global Reporting Initiative and the UN Sustainable Development Goals, including labour related metrics covering safe and decent work, as well as diversity and inclusion.

Our Policies

In addition to complying with local laws and statutory requirements in individual countries where we operate, Olam has embedded our commitment to human rights in our [Fair Employment Policy](#) and our [Code of Conduct](#) which are in line with the United Nations Guiding Principles on Business and Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work.

Our [Supplier Code](#) is grounded in the international human rights guidance and identifies the human rights standards we expect our suppliers and business partners to uphold. By 2020, 90% to 100% of directly originated volumes in our priority supply chains were responsibly sourced through suppliers we engaged on the Olam Supplier Code.

We are also a signatory to the UN Global Compact. While we work to advance respect for all rights, we focus on the most salient human rights issues and we prioritise initiatives that reach the most vulnerable people in both our workforce and supply chains.

Name of Policy	Date published/revised
Code of Conduct	March 2019
Olam Supplier Code	April 2018
Fair Employment Policy	September 2018
Living Landscapes Policy	April 2018
Sustainable Palm Policy	January 2019
Plantations, Concessions and Farms Code	July 2015

Remedy and reporting

We have established a cross-commodity [Grievance Procedure](#) which applies to our own operations and third-party suppliers to enable concerns about breaches of our policies to be raised confidentially. All grievances are logged and investigated with status updates, and actions, reported.

We continue to raise awareness and understanding, and provide training on human rights and labour practices for our employees and workers, as well as with our suppliers, and encourage them to speak up and raise concerns, without retribution. Where it has been identified that we have contributed to adverse impacts, we endeavour to provide or cooperate in the remediation process.

We report on our activities and progress in our [Annual Report](#) and [Global Reporting Initiative Report](#).

Commitment to responsible supply chains

Human rights issues are challenging to identify and complex to prevent and mitigate. We are committed to developing supply chains that respect people and human rights, where no children or adults are subject to illegal, forced, abusive or dangerous labour practices.

We are building strong human rights partnerships, as we realise that innovative solutions to human rights issues require concerted collaboration across public and private sectors. Through our membership of the World Business Council for Sustainable Development (WBCSD), and our participation in other sector-wide initiatives, we are joining with global business leaders, NGOs and

stakeholders to raise the bar on human rights and positively impact the lives of millions of the world's most vulnerable people.

In 2020, as part of our due diligence process to develop a more detailed understanding of human rights risks across our supply chain, together with Wageningen University, we developed a model to assess human rights risks at a country and commodity level based on the ILO Declaration on fundamental principles and rights at work (ILO, 2016). The model was applied to 33 countries and 19 commodities in both our own and third-party supply chains. More than 400 sources were assessed for sectoral risks. Next steps are to better understand these country and commodity level risks in our supply chains and to identify appropriate actions where required. This model can now be used by other companies to assess human rights risks.

Additionally, we undertook an analysis of different root causes and risk multipliers of child labour in the supply chains of 12 assessed Olam programmes. To understand why some programmes are more successful in achieving outcomes and creating significant impact on reducing child labour risks, the study looked into programme design and management. The study highlighted a number of best practices, gaps and recommendations.

During the past year, COVID-19 restrictions in higher-risk countries have created additional hardships for smallholder farmers and suppliers, in particular have leading to lower income and higher risks on food security, and child-labour risks in specific origins. In April 2021, an Olam-conducted [survey](#) of over 3,400 farmers across 19 countries showed the impact smallholder farmers have seen to their incomes, livelihoods and their communities as changes and disruptions have been felt across global food and agricultural supply chains. These insights confirmed what we're seeing and are helping inform how we continue to respond on the ground in rural communities.

Palm Oil

As part of our [Sustainable Palm Oil Policy](#), we are working towards a traceable and transparent palm oil supply chain, which upholds responsible labour practices and respects the rights of communities. , Olam prioritizes buying of certified palm oil according to market demand and works with our suppliers to improve labour practices in plantations and mills.

In 2019 we partnered with the Fair Labor Association to work with one of our suppliers to identify and assess labour risks. This first assessment is enabling us to take steps to refine and strengthen procedures, as well as work together towards addressing some of key issues alongside suppliers and other industry members. As part of the FLA's internal monitoring system (IMS) and independent external monitoring (IEA) for our third-party suppliers, supplying companies are subject to FLA's IEA which covers ten requirements namely human resources management system, recruitment and hiring, employment terms and conditions, administration, workers' involvement, right to organise and bargain, work rules and discipline, access to training for family members, HSE management system and grievance procedure. The program supports our palm oil supply chain business and our suppliers to evaluate performance and continuously improve our labour practices. Summary report is available on the FLA's [website](#).

For our own plantations in Gabon, we maintain ongoing, regular dialogue with 60 villages in proximity to our plantations, to address any concerns, and to invest in projects agreed with the communities to improve local education, healthcare, access to water and infrastructure.

We continue to maintain regular, open dialogue with our employees and their representatives at our oil palm operations and are implementing jointly agreed initiatives, such as food allowances and annual medical checks for workers. We have initiated specific programmes to engage and support female workers, which make up one third of our total workers at our palm operations.

Cocoa

During the past year, we published our first impact report for [Cocoa Compass](#) setting out progress against our ambition towards having a lasting, positive impact on the future of sustainable cocoa.

Amongst our progress and achievements was confirmation that along with reaching our 100% direct supply chain traceability target, we made progress against our milestones which include targets on living incomes, child labour and natural capital.

We have established child labour monitoring across our managed sustainability programmes, covering 183,000 households in nine countries, and 100% deforestation monitoring across our direct global supply chain, covering almost 12,000 suppliers.

The Child Labour Monitoring and Remediation System (CLMRS) developed in collaboration with the Fair Labor Association (FLA), covers all of our managed sustainability programmes and is a groundbreaking new tool for monitoring child labour in Cameroon, Uganda, Brazil and Indonesia. This is a critical step towards our goal of eradicating child labour from the cocoa supply chain by 2030. With training and the help of a smartphone, community leads, and field officers now collect detailed social data on individual farming households, helping to identify children at risk and take faster, more effective action.

This data paints a clearer picture of child labour in the supply chain and the interventions needed. For example, in Côte d'Ivoire, which has a reported high prevalence of child labour, 79% of school-aged children attend school and 75% of children identified in a situation of child labour combine school and work and in 97% of child labour cases, children were working for a parent or a relative. These findings are in line with the recent NORC study from the University of Chicago which showed that school attendance has increased significantly in Côte d'Ivoire in the past ten years, indicating that actions like establishing birth certificates, building classrooms, providing school equipment and setting up Village Savings and Loans Associations are contributing to improving access to education.

We have proactively partnered with the FLA to map the working conditions in our smallholder cocoa supply chain in all our nine sourcing countries. For example, the FLA team alongside our local team engaged government stakeholders, civil society organisations, local community leaders, farmers, workers, and their families to understand the root causes of child labour. The findings informed our development of CLMRS. The FLA will continue to independently monitor and then publicly report on our efforts to improve the conditions for the cocoa farmers and their families in the country.

Eradicating child labour from the cocoa supply chain requires a concerted effort. We are actively participating in multi stakeholder partnerships, including [World Cocoa Foundation](#) (WCF) and the [International Cocoa Initiative](#) to better focus resources and support the necessary actions to tackle labour issues and improve cocoa farmer livelihoods.

Hazelnuts

Turkey produces 70% of the world's hazelnuts and at harvest, the reliance of farmers on a seasonal workforce brings challenges including issues around working practices, fair wages and child labour. Since 2012, Olam has been taking actions to support farmers and seasonal workers, and to improve conditions in the hazelnut supply chain in Turkey. Partnering with government, industry, customers and NGOs we are helping improve workers' livelihoods and incomes, working conditions and eliminate unacceptable labour practices.

We continue to work with the [Fair Labor Association \(FLA\)](#) on independent auditing of our hazelnut supply chain and additionally partnering with the FLA, local authorities, and NGOs to support initiatives that are helping to improve working practices and wages for workers. This includes training for workers on issues such as gender equality, child labour and financial literacy.

A grievance mechanism has been put in place to enable workers and farmers to raise concerns and complaints free of charge via telephone. All complaints are immediately and thoroughly investigated and appropriate actions taken as necessary.

We have established Summer School programme in Turkey for children of seasonal worker and despite COVID-19 imposed movement restrictions, we set up two new schools in 2020 with one school being run in partnership with the [International Labor Organisation \(ILO\)](#); both offer catch-up courses on academic subjects, as well as creative and sports activities. These schools provide safe spaces where

children of workers have access to educational facilities including libraries, information technology classes, sports and playground facilities, as well as healthy daily meals.

Cotton

We are committed to the traceable and sustainable supply of cotton. Through our membership of [Cotton Made in Africa](#) and the [Better Cotton Initiative \(BCI\)](#), we continue to support activities to improve agricultural and labour practices, as well as improving farmers' livelihoods.

Our operations in Africa provide inputs and train cotton farmers on Good Agricultural Practices, including supporting female farmers.

Our continuing commitment

We are committed to playing our part to work with stakeholders from the public and private sectors to tackle discrimination, eliminate unsafe and illegal labour 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 our Slavery and Human Trafficking Statement, please click [here](#).

This Statement was approved by the Board of Olam International UK Limited on behalf of all of its wholly owned subsidiaries which includes Olam Europe Limited.



Gerard Manley
Director, and CEO (Olam Cocoa)
Olam International UK Limited