

CEFETRA LIMITED

Modern Slavery and Human Trafficking Statement

For the financial year ended 31 December 2025

1. Introduction

This statement is made by Cefetra Limited pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Cefetra during the financial year ended December 2025 to identify, assess and address the risks of modern slavery and human trafficking in our business and supply chains.

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. Cefetra recognises that agricultural and global commodity supply chains can involve heightened risks because of their geographic reach, multiple tiers, use of seasonal and migrant labour, and the number of parties involved between production and final delivery.

We do not claim that modern slavery risk can be eliminated solely through contractual requirements or certification. Our approach is to identify where risks may be greatest, apply proportionate due diligence, investigate concerns and work with relevant parties to prevent or remedy harm.

During and following the reporting year, Cefetra continued to strengthen its approach, working in coordination with group-level governance and policy development. This included reviewing its risk-assessment methodology and, following the year end, introducing updated group human rights and supplier standards and developing a new employee training programme.

2. Organisation, business and supply chains

Cefetra is a UK-based agricultural commodities business supplying raw materials to the animal feed, food, drink and fuel industries. We source, trade, store and deliver grains, oilseeds, oilseed meals and other feed, food and fuel ingredients. We deliver approximately 85,000 tonnes of products each week and employ more than 200 people across Cefetra UK.

This statement covers Cefetra Limited and the following UK companies, which are managed centrally and are subject to the policies and processes described in this statement:

- Cefetra Grain
- Sinclair Logistics Limited
- Burkes Agencies Limited
- Premium Crops – a division of Cefetra Ltd

Our supply chains extend across the UK and Ireland, South America, North America, West Africa, Central and Eastern Europe, Indonesia and Malaysia. They include farmers and growers, originators, processors, crushers, storage providers, laboratories, road hauliers, ports, vessel owners and operators, agents and other service providers.

UK grain is primarily originated through relationships between our grain-buying team and growers. Imported products may pass through several commercial and physical supply-chain stages before Cefetra takes ownership or delivery.

3. Policies and governance

The Board of Directors holds overall responsibility for Cefetra's approach to modern slavery, with operational responsibility shared across procurement, trading, supplier approval, sustainability, quality, health and safety, human resources and logistics.

Our relevant policies and standards include:

- the Cefetra Group Human Rights and Social Responsibility Statement 2025, applying to all Cefetra operations and committing the group to risk-based human rights and environmental due diligence. Since the end of the reporting year, Cefetra has adopted the Cefetra Group Human Rights and Social Responsibility Statement 2026 and the Cefetra Group Supplier Code of Conduct 2026. These documents strengthen and formalise the policies and expectations that applied during 2025 and will form part of our due diligence framework for the next reporting year;
- the Employee Code of Conduct, addressing human rights, labour standards, discrimination, harassment and the fair treatment of agency and third-party labour;
- employee policies on equality, dignity at work and health and safety;
- the Bribery Code of Practice and related business-partner screening, which extends our due diligence beyond labour standards to the wider financial and reputational risk factors — such as concealed payments or unverifiable intermediaries — that can also indicate or enable exploitative labour practices; and
- requirements under relevant sustainability and assurance schemes, including Cefetra Responsible Soya (CRS), Round Table on Responsible Soya (RTRS), Roundtable on Sustainable Palm Oil (RSPO), ProTerra, International Sustainability & Carbon Certification (ISCC), (GMP+), EFISC – GTP, Organic certification and the Feed Materials Assurance Scheme (FEMAS), where applicable to the relevant product or supply chain.

Suppliers are expected to comply with applicable law, maintain accurate employment records, provide safe and healthy working conditions, respect freedom of association, protect children and young workers, and ensure pay and working hours meet applicable requirements.

Employees, suppliers, farmers, communities and other stakeholders can raise concerns safely and confidentially through the Cefetra Whistleblower Policy, our recognised internal reporting channel. This policy is aligned with whistleblowing protections in the UK, which are provided under the Public Interest Disclosure Act 1998 (PIDA), embedded within the Employment Rights Act 1996. The Supplier Code requires accessible, confidential reporting, protection from retaliation, and cooperation with any resulting investigation

4. Due diligence

Cefetra applies due diligence according to the nature and assessed risk of the supplier, commodity, service and sourcing location. During the reporting year, our due diligence included the following activities:

- Screening new business partners through a third-party platform, including checks relevant to sanctions, adverse information and unethical business practices.
- Maintaining a list of higher-risk countries and applying additional review where appropriate.
- Requesting relevant suppliers in higher-risk sourcing countries to complete an ethical or supplier questionnaire.
- Requiring suppliers under the Cefetra Group Supplier Code of Conduct to provide information and documentation required for monitoring or audit purposes.
- Checking applicable quality, sustainability and assurance certifications.
- Using independent audits under CRS and other recognised certification schemes where those schemes apply.
- Maintaining longer-term supplier relationships to improve transparency and support corrective action where improvement is required.
- Benchmarking and external third-party validation by Sedex and Ecovadis.

Certification and audit reports are inputs into our assessment; they are not treated as conclusive evidence that no modern slavery risk exists. Where information is incomplete, inconsistent or

indicates elevated risk, the matter may be escalated for enhanced review before approval or continued trading.

5. Risk assessment and management

Our assessment recognises that the most material potential risks occur beyond our directly employed workforce, particularly in upstream agricultural production and processing and in internationally sourced logistics services. Factors considered include:

- Country and regional risk, including the strength and enforcement of labour protections.
- Commodity and sector risk, particularly labour-intensive agricultural activities.
- Use of seasonal, migrant, temporary or agency labour.
- Recruitment practices, including the risk of recruitment fees, debt bondage or retention of identity documents.
- Limited visibility beyond direct suppliers.
- Working and living conditions at production and processing sites.
- Seafarer welfare, payment of wages and working conditions in maritime transport.

For responsibly certified soya and palm-related supply chains, Cefetra uses the relevant social and labour requirements of schemes such as CRS, RTRS, ProTerra and RSPO as part of its controls. Under CRS, certified production sites are audited annually and before initial certification. These controls support, but do not replace, Cefetra's own risk-based assessment.

Shipping providers contracted by Cefetra are required to comply with applicable requirements, including the Maritime Labour Convention where applicable. Cefetra may consider available inspection, certification or other information where a concern is identified.

6. Responding to concerns and remediation

Any indication of modern slavery or serious labour exploitation is treated as a priority. Our response is proportionate to the nature and severity of the concern, and may include gathering further information, commissioning or reviewing an audit, engaging directly with the supplier, agreeing a time-bound corrective action plan, monitoring its implementation, and escalating the matter to senior management.

The safety and interests of potentially affected workers come first, and we seek specialist or regulatory support where necessary. Suspending or terminating a commercial relationship may be appropriate in response to a serious breach, a failure to cooperate, or a failure to remedy identified harm. However, we recognise that immediate disengagement can increase risk to affected workers, and we weigh these consequences carefully before deciding how to act.

During the reporting year, Cefetra did not receive any reports or identify any confirmed instances of modern slavery or human trafficking within its business or supply chains, and no modern slavery-specific investigations or corrective actions were required as a result. We recognise, however, that an absence of reported cases does not mean an absence of risk, and we continue to apply our due diligence, monitoring and reporting procedures accordingly.

7. Measuring effectiveness

We assess the effectiveness of our approach using appropriate performance indicators. The following table reports results for the financial year and, where appropriate, the target for the next year.

Performance indicator	Reporting-year result	Next-year target	Status
Modern slavery or human trafficking cases identified	0	not targeted	Ongoing
Reported concerns investigated and, where substantiated, remediated	-	100%	Ongoing

Relevant staff completing modern slavery training	100% relevant staff	100% relevant staff	Ongoing
Ethical / social audits and actions reviewed	4	6	Ongoing

We will review these indicators annually and use the results, audit findings and any concerns raised to refine our due diligence and training priorities.

8. Training and awareness

Cefetra provides modern slavery, human rights, and responsible-sourcing training to relevant employees via our e-learning platform, including certification-specific modules referenced in Sections 3 and 4. At least one member of staff is a qualified ethical auditor. Training is designed to help employees recognise indicators of forced labour and human trafficking, understand Cefetra's policies and due diligence responsibilities, raise concerns, and apply appropriate escalation procedures.

During 2025, 100% of employees identified as requiring role-specific modern slavery or responsible-sourcing training completed the applicable training. Following the reporting year, Cefetra began rolling out a new modern slavery awareness programme to all employees.

9. Priorities for the next financial year

During the next financial year, Cefetra intends to focus on the following actions:

- Refining the documented methodology for assessing country, commodity, supplier and service-provider risk.
- Setting and monitoring the performance indicators identified in this statement;
- Reviewing contractual and Supplier Code of Conduct provisions dealing with modern slavery, audit rights, corrective action and termination;
- Strengthening training for employees in procurement, trading, logistics, supplier approval, sustainability and human resources.
- Increasing awareness of our whistleblower channel among suppliers and their workers, to support earlier identification of potential concerns.
- Reviewing the accessibility and effectiveness of internal and external reporting channels. Clarifying internal ownership and reporting lines for modern slavery risk.

10. Approval and signature

This statement was approved by the Board of Directors of Cefetra Limited on 29 September 2026.

It has been signed on behalf of the Board by:



Andrew Mackay
Managing Director
Cefetra Limited
Date: 29/09/2026