

MODERN SLAVERY AND HUMAN TRAFFICKING ANNUAL STATEMENT FOR THE 2024 FINANCIAL YEAR

Published August 2025



This Modern Slavery and Human Trafficking Annual Statement is produced by UCC Europe Ltd in accordance with Section 54 of the Modern Slavery Act 2015. The Statement outlines the steps that UCC Europe Ltd has taken to mitigate modern slavery and human trafficking during the year ending 31 December 2024.

This statement covers UCC Europe Ltd. For the UCC Coffee UK Ltd Modern Slavery Statement please see the [company website](#).

Our previous Statement can be [accessed here](#).

1. Our organisation and supply chains

Our organisation

UCC Europe Ltd ('the Company') is a leading private label coffee business within retail, hospitality and foodservice markets, with operations in United Kingdom, France, Germany, Ireland, The Netherlands, Portugal, Spain, and Switzerland (together 'the Group'). UCC Europe Ltd is headquartered in the United Kingdom, and is a subsidiary of the parent company, UCC Holdings Pte. Ltd. in Singapore. Across the Group, around 1600 members of staff are employed to create and manage coffee experiences tailored to customers' needs, including own brand and bespoke private label coffee products, the supply and service of professional coffee, beverage equipment, ancillary products and provision of customer training and market insight. The organisation includes approximately 25 people directly employed by the Company, who provide corporate management, support, and services to its European operating subsidiaries, as well as consolidated financial reporting of the Group.

Our supply chains

A range of supply chains are utilised across the Group, which vary dependent on product, geography, spend and level of influence we have upon them. Supply chain activities are managed through both a centralised and local-led procurement approach and fall mainly into the following areas:

- Sourcing green (unroasted) coffee for European operations, through our centralised coffee procurement centre in Switzerland (UCC Coffee Services Switzerland)
- Purchasing of packaging materials, and other operational/factory-related ingredients, goods, and services essential to the manufacture and distribution of our products
- Procuring, distributing, and servicing of professional coffee machines and beverage equipment, including associated spare parts and ancillary products such as machine cleaning products
- Indirect procurement of goods and services to support our business needs



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2. Our commitment

UCC Europe Ltd is committed to complying with national laws and respecting all internationally recognised human rights. We do not condone any form of modern slavery, human trafficking, or exploitation within our business and supply chains. This commitment is expressed through a variety of policies, controls, and practices which are produced and implemented by UCC Europe Ltd.

We expect our employees, suppliers, and third parties that we work with to support our commitment to preventing and addressing modern slavery, human trafficking and any form of exploitation in their operations and own supply chains.

We also recognise that modern slavery is a global issue, and businesses can be inadvertently implicated in it in their operations and supply chains. If any instances of modern slavery are identified in our supply chains, we will work collaboratively with our suppliers and business partners to remediate and resolve the issue. We may responsibly suspend or terminate relationships with a supplier or business partner who fails to remediate a modern slavery issue or demonstrate sufficient improvement.

3. Our policies and governance structure

UCC Europe Ltd operates a range of internal and external policies and control measures that help mitigate and prevent risks of slavery and human trafficking, taking practical steps to ensure we do not knowingly facilitate modern slavery or human rights abuses.

We are guided by the following principles and standards:

- International Bill of Human Rights, which includes:
 - The Universal Declaration of Human Rights
 - The International Covenants on Civil and Political Rights
 - The International Covenants on Economic, Social and Cultural Rights
- The ILO Declaration on Fundamental Principles and Rights at Work
- The ILO Core Labour Standards
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The OECD Guidelines for Responsible Business Conduct

Through 2024, we have continued to evolve our practices and actions to ensure our employees, suppliers, and business partners understand our commitment to the sustained eradication of human rights abuses and modern slavery. Through our internal governance structure and review processes, we strive to continue learning and building rigour into our business policies and practices.

We have several policies that underpin our efforts to ensure that we are addressing the risk of modern slavery across our operations and supply chains.

Our Human Resources policies and controls support the recruitment and onboarding of new employees, ensuring right to work checks and include ongoing alignment to the 'Employer Pays' principle for recruitment of permanent and agency labour.

The Human Resources (HR) department is responsible for internal employment, labour and recruitment policies and controls related to modern slavery. Management teams are accountable for the day-to-day implementation and execution across the business, in addition to checkpoints within the HR systems.

Regular site visits by HR teams to our business operations ensure these policies are effectively implemented and safeguarded, and specific governance committees meet regularly to review internal policy and strategy in action. Strengthened control measures are overseen by the Human Resources Department, such as the onsite management agency worker interviews and whistleblowing helpline, and during 2024 no issues were identified.

Since 2021, our UCC Europe Supplier Code of Conduct has governed our green coffee suppliers, detailing our business-wide commitment to responsible and ethical business practices, and the policy provisions which include the prohibition of modern slavery and child employment under the legal minimum age. This policy also makes up part of our standard purchase terms and is part of our contract template.

Our Supply Chain, Procurement and Technical teams are responsible for ensuring our supplier-facing policies and practices are communicated and implemented effectively, meeting our customer standards, and external audit and accreditation requirements.

Additional policies include:

- UCC Group Purpose and Values
- UCC Group Human Rights Policy
- UCC Europe Group Code of Ethics and Behaviours
- UCC Europe Child Labour Supply Chain Due Diligence Policy
- UCC Europe Group Whistleblowing Policy
- UCC Europe Group Equal Opportunities and Dignity at Work Policy

Further details on how each policy is implemented and enforced, and communicated to our employees and business partners, can be found in the policies themselves.

The UCC Group (globally) has established a Senior Committee on Sustainability, comprising Group Directors and executives responsible for key areas. At the monthly sustainability meetings, we examine various sustainability-related actions including efforts to respect human rights, from a global perspective, and promptly resolve any issues that arise. Furthermore, the Board of Directors of UCC Holdings is responsible for observing the Group's commitment to human rights and overseeing its efforts and receiving reports on the progress of important issues.

4. Our due diligence approach

In keeping with our commitment to ensuring that modern slavery and human trafficking do not take place in any part of our operations or supply chain, we continue to mitigate the risk by strengthening our due diligence practices in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Responsible Business Conduct.

In 2023, we conducted a Human Rights Due Diligence Maturity Assessment (HRDDMA), followed by a gap analysis carried out by a third-party expert, to determine our approach to due diligence and how we manage human rights risks. We continuously review our progress against the HRDDMA. We will continue to embed required changes in the coming year to address gaps in our processes and strengthen our policies, identifying opportunities for improvements and ensuring the sustainable growth of the business.

As a member of SEDEX (Supplier Ethical Data Exchange), the roasteries of UCC Europe Ltd complete an annual self-assessment questionnaire to assess our ethical, health and safety, and employment practices and the sites undertake biennial SMETA audits. A continuous improvement approach is undertaken to minimise the occurrence of non-conformances.

UCC Europe sources primarily from large, reputable organisations with developed human rights due diligence systems. Nonetheless, we are aware of the risks associated with the coffee supply chain and conduct proportionate due diligence to identify and address risks.

In 2024, almost half of the green coffee sourced for customers across the UCC Europe Group was from certified standards (including Rainforest Alliance and Fairtrade). These certified standards include farm and supply chain criteria relating to the prevention of modern slavery and human trafficking and include regular audit and compliance requirements for all certificate holders in the value chain.

Additional work on coffee supply chain traceability for coffees not purchased under one or more certified sustainable schemes of Rainforest Alliance, Fairtrade, Organic is currently in progress. This will enable the green coffee buying team to locate suppliers in the coffee supply chain and factor them into supply chain due diligence for human rights and environmental impacts.



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Furthermore, UCC has conducted a supply chain mapping exercise to identify our leverage in business relationships and affected stakeholder groups to be consulted in future stakeholder engagement and considered in our human rights' due diligence approach.

The UCC business is committed to addressing impacts within its supply chain that the company has caused or contributed to by providing for or cooperating in the remediation of those impacts. In doing so, UCC will consult and engage with impacted rights-holders and their representatives to determine appropriate remedial steps to address the adverse human rights impacts.

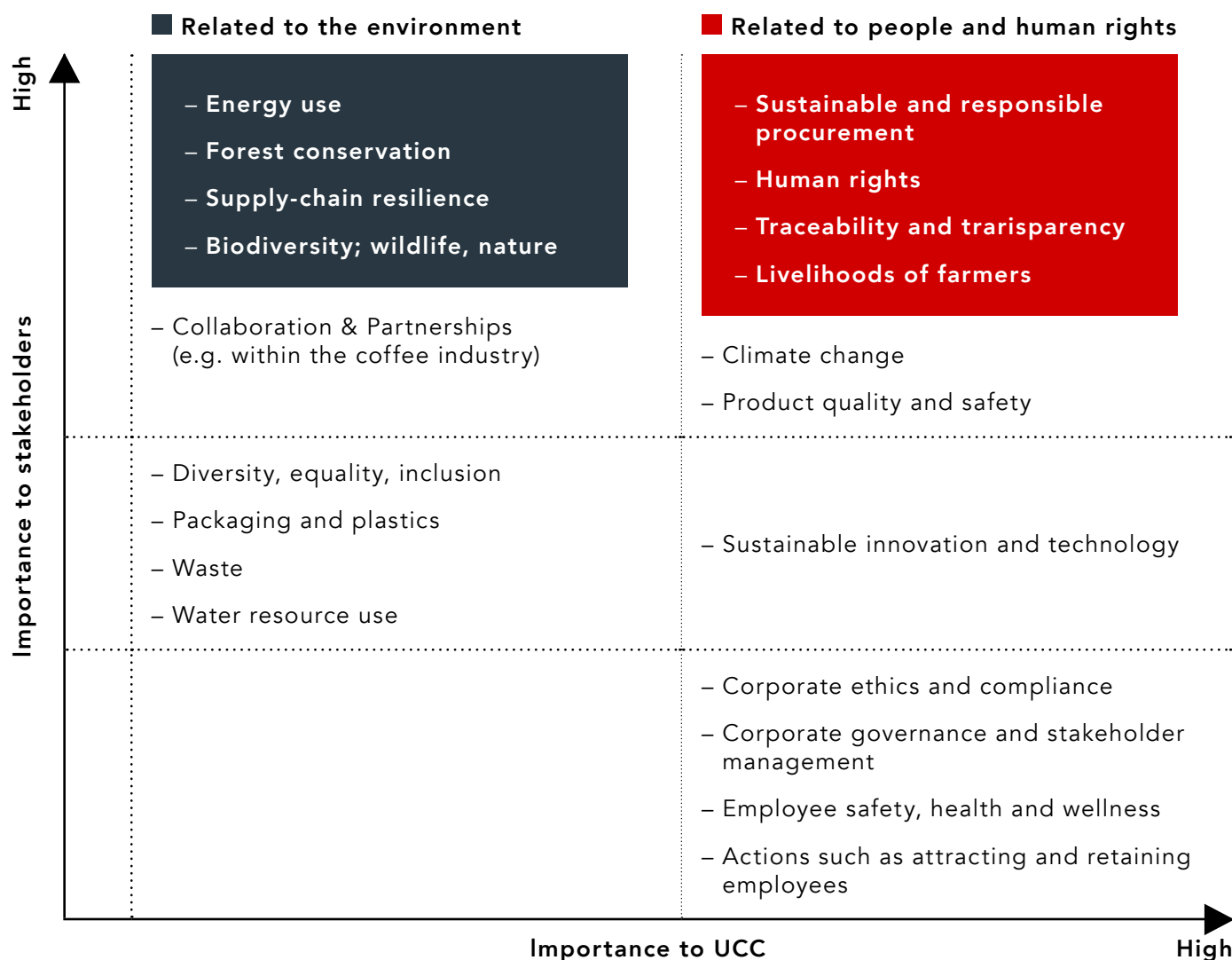
If, through our supplier due diligence process, we identify a supplier who does not have adequate modern slavery risk management processes in place, the supplier will be sent corrective actions to strengthen processes and mitigate any risk.

Our new pre-qualification requirements for supplier onboarding are currently in development. These are based on the findings of the 2023 supplier risk assessments and lessons learned to continuously improve the process.

At UCC, stakeholder engagement serves as a critical pillar of our human rights' due diligence approach. Anchored in our Double Materiality Assessment and aligned with the CSRD ESRS requirements, we have designed a comprehensive and structured process to capture the perspectives of both external and internal stakeholders. This engagement aims to inform sustainable business practices, identify both positive and negative impacts, and guide our future strategies.

5. Risk assessment and management

Our materiality assessment places human rights and sustainable and responsible procurement as high priority issues to us and our stakeholders:



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5.1. Risks associated with recruitment

Internal controls include recruitment and selection of employees to ensure that all persons employed or engaged to provide contracted labour for the Company or Group are suitable for appointment, appropriately qualified and can be lawfully employed. We work with a preferred supplier list of labour providers (online or agency) and all costs of recruitment are agreed in advance and in line with the 'Employer Pays' principle.

Across the Group, each local Human Resources (HR) function is responsible for internal employment, labour and recruitment policies and controls. Management teams are accountable for the day-to-day implementation and execution across the business, in addition to checkpoints established by HR and in accordance with local regulations.

Within our own operations, our Human Resources department has internal policies and processes for ensuring all employees are of the appropriate age and addressing any suspected employment rights issues that arise.

5.2. Risks associated with our supply chain

The UCC Group conducted a human rights risk assessment based on our human rights policy to evaluate the potential impact our business may have on human rights. First, we narrowed down the business areas considered to have significant risk and specifically examined the potential for human rights violations (i.e. who might be affected and what human rights could be impacted) at each stage of the process in those areas. As part of the assessment, we checked the results of past self-assessments received from the UCC Group's primary suppliers. We cross-referenced these results with a desktop risk assessment analysis to make an initial assessment of risk categories, including potentially high-risk countries and human resource issues. Next, we conducted interviews with a wide range of stakeholders across the value chain. Based on the information obtained, we assessed our company involvement along with the severity and likelihood of the issues and ultimately determined the priorities for the UCC Group to address the identified human rights violation risks. The UCC Group has begun preparing specific action plans for identified human rights risks and priority issues, including the promotion of sustainable coffee procurement, which we intend to address in order of priority.

Green coffee is a key raw material to the delivery of our Total Coffee Solution. We recognise that coffee-growing countries and the agricultural sector have inherent social risks and vulnerabilities.

High-level risks for the coffee-sourcing regions were identified using a combination of third-party assessments and desk-based research. Other sources of high-level risk data include SEDEX 'RADAR' risk mapping data and insights from regional coffee associations such as the European Coffee Federation. We also receive risk data from third parties, including Rainforest Alliance, Fairtrade, ILO, US Department of Labour, and UNICEF Child Labour risk scores. These findings inform the approach to supplier due diligence on an ongoing basis.

Our European green coffee procurement centre, UCC Coffee Services Switzerland (UCCCSS), manages all green coffee sourcing activities and adopts a supplier relationship management approach, which includes selecting suppliers with integrated supply chains for added upstream visibility and traceability, and specialist importers who work directly with producers.

Our BRC-accredited roasteries operate strict procedures for supplier approval and supplier risk assessment. We expect all our suppliers to support working conditions that are safe, legal, and fair, in addition to required quality and food safety standards. As part of UCC's supplier risk assessment process, Modern Slavery and Ethical Trading Policies are requested from suppliers and our Ethical Policy is displayed at key employee rest locations, such as staff rest areas

We receive bi-annual self-assessments from key suppliers based on the UCC Group's Supplier Code of Conduct to ensure fair and ethical business transactions. This self-assessment asks suppliers to answer 20 questions on topics such as human rights, labour, child labour, fair corporate practices, quality and safety, and the supply chain. When a supplier's self-assessment results show a large number of risks and issues, we interview them in detail to understand the situation, then work together to implement initiatives to bring about improvement. In addition, via feedback on the overall results from these self-assessments, there is a mutual exchange of information with all our suppliers that builds a cooperative framework for further improvement.



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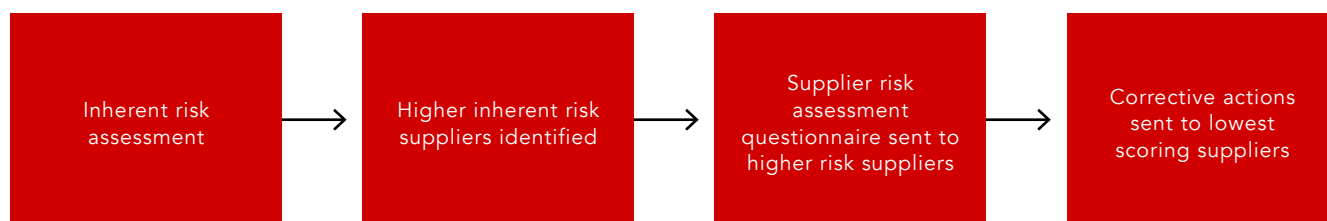
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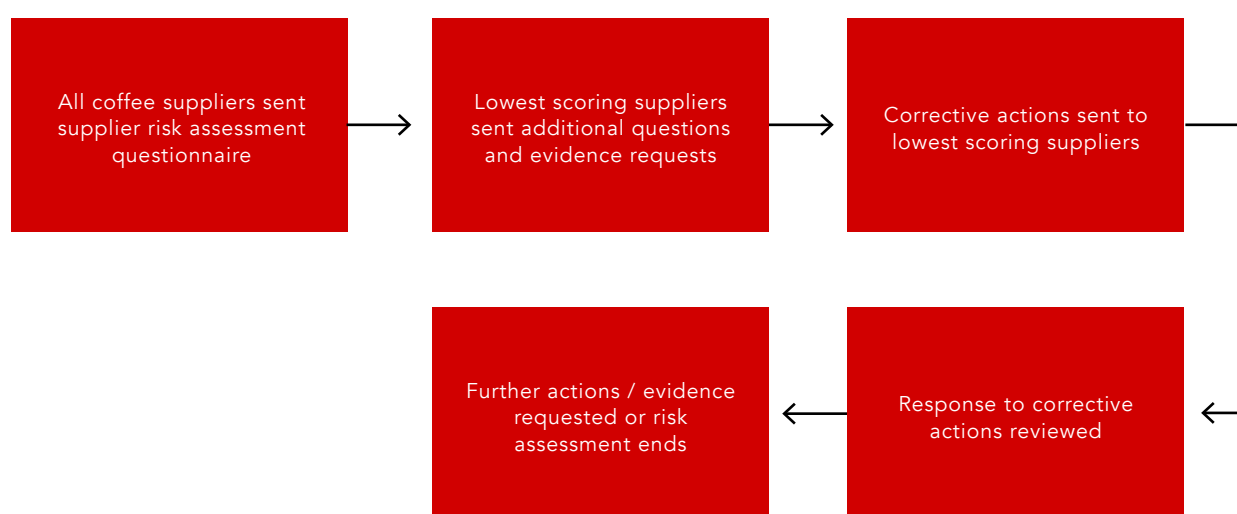
Due to the higher risk associated with the coffee supply chain, all coffee suppliers were sent risk assessment questionnaires. The findings of these assessments have been analysed and corrective actions devised for the lowest-scoring suppliers.

Below is a summary of the supplier risk assessment process:

Non-coffee supply chain



Coffee supply chain



As the distributor of leading professional coffee and beverage equipment brands, UCC Europe Ltd has long-standing and collaborative relationships with original equipment manufacturers (OEMs). These OEMs are mainly located in the UK, Switzerland, Italy, and the USA and follow their policies or country regulations to ensure the respect of human rights in all forms, in addition to respecting UCC supplier-facing policies.

Following continuous improvement assessment of Tier 1 supplier policies, measures and controls, and to further our commitment to responsible and ethical business practices, additional control and due diligence measures have been introduced as part of UCC Europe Ltd supplier risk management protocols. These now include a dedicated supplier ethical trade questionnaire, aligned to the ETI base code, linked (where possible) to the SAQ of the SEDEX (Supplier Ethical Data Exchange) system, and a supporting risk-based supplier audit approach. To help control the risks associated with the green coffee supply chain, our European green coffee procurement centre, UCC Coffee Services Switzerland, has adopted the following measures:

- Sourcing from certified standards where requested
- Selecting suppliers with integrated supply chains for added traceability and upstream supply chain visibility
- Conducting field visits during annual origin visits
- A supplier performance assessment process

5.3. Reporting mechanisms

The UCC Group Whistleblowing Policy sets out a process to manage reported grievances, including those relating to modern slavery. In the first instance, employees may raise concerns with a line manager or contact the senior manager of a business unit. Employees are also able to contact the local or European HR Director in instances where the above personnel cannot be contacted. Following the adoption of the UCC Group Code of Ethics and Behaviours Policy and the 2022 update of the UCC Group Purpose and Values, the Safecall whistleblowing service was launched in August 2022. The internal whistleblowing mechanism acts as an early warning system for UCC employees to report potential human rights issues, including modern slavery and human trafficking, within our operations and supply chain.

This service is paid for by UCC but operates with strict rules around confidentiality and disclosure. Employees are trained on how to use the service in case they are not comfortable raising an issue through the internal process of contacting a line manager or HR.

The UCC Group has joined JaCER, a non-judicial grievance platform aligned with the UN Guiding Principles on Business and Human Rights. We have established a contact point to address any human rights impacts across our value chain. Reports submitted through JaCER are confidential and anonymous, with whistleblowers protected from any disadvantage. This mechanism is open to both internal and external stakeholders. Based on UCC Europe's Supplier Code of Conduct, our suppliers are required to have in place internal mechanisms for receiving and handling reports of workplace grievances and wrongdoings. These mechanisms must enable fair, confidential, and anonymous reporting without fear of reprisal. Suppliers are expected to provide training to workers and employees on how to access the grievance mechanism and have remediation processes in place to remediate identified harms promptly and sufficiently.

5.4 Remediation

The UCC Remediation Protocol (the Protocol) is in development. The Protocol establishes the procedures for identifying and addressing adverse human rights impacts across UCC's operations and value chain. Grounded in the UN Guiding Principles on Business and Human Rights, the Protocol outlines a clear framework for remediation, prioritising the safety and welfare of those affected.

The Protocol is complemented by the Remediation Guidance Document, which provides additional context and practical examples to support the implementation of effective remediation measures. Together, these documents form a comprehensive approach, with the Standard Operating Procedure (SOP) offering a structured process for managing adverse impacts, and the Guidance Document enhancing this framework by detailing expectations, exploring remediation scenarios, and promoting alignment with international standards.

6. Raising awareness

Our Modern Slavery training strategy continued to be developed through 2024 to further enhance people's learning and understanding of modern slavery and play a part in helping to mitigate and eradicate forced labour across society.

To build awareness and understanding of modern slavery, a subsidiary of the Company, UCC Coffee UK Ltd, uses an independent e-learning module. Since 2019, all employees have received training, including directors and managers (including those in procurement and customer facing roles), UCC Europe employees and key employees of our coffee procurement centre. Automatic refresher training is built into our system and is tracked to ensure ongoing renewal of knowledge. Further content was delivered as a refresher to Line Managers and Heads of Departments in 2023.

All employees in Europe have also attended Purpose and Values training on the UCC group-wide company values, including our commitments to sustainability through upholding human rights.

We developed an in-depth training workshop on Human Rights Due Diligence (HRDD) for UCC Group's coffee buying team. This workshop focused on identifying human rights risks within procurement processes and equipping our team with strategies to address these challenges responsibly. Engagement with industry forums and federations such as the European Coffee Federation, and national coffee trader associations, also provide a means of external communication and inter-company information sharing.



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7. Measuring effectiveness

The table below provides a brief overview of our progress against our ongoing goals:

Continuous Improvement Goals	2024 Progress Summary
Maintain or increase the proportion of coffee sourced from certified schemes, in association with customer and own brand needs.	Maintained at 48%
Provide additional training for European-wide leadership teams not previously covered.	Progressed through the design of targeted HRDD training
Build group-wide due diligence capability to meet the requirements of the United Nations Guiding Principles for Businesses and Human Rights.	Progressed (see action set out under 'Our Due Diligence Approach')
Improve procurement due diligence via roll-out of SEDEX supplier enrolment for non-coffee procurement and use of UNGP-aligned surveys and process for green coffee procurement.	Progressed for non-coffee procurement for operations in Spain

Approved by UCC Europe Ltd on 7th August 2025 and signed by Ichiro Nishikura, CEO