



Modern Slavery Statement

ECOM Agroindustrial Corp. Ltd (“**ECOM**”) is proud of the steps it has taken, and continues to take, to combat slavery and human trafficking which may exist in commodity supply chains. It is a fundamental policy of the ECOM group of companies (the “**ECOM Group**”) to conduct its business with honesty and integrity and in accordance with the highest legal and ethical standards.

We are a global commodity trading and processing company specializing in coffee, cocoa and cotton, in major producing and consuming countries, with ancillary agricultural operations in speciality commodities. ECOM has its head office in Switzerland but operates in over 40 countries with over 5,400 permanent employees worldwide.

OUR BUSINESS

Our business is organised into three business units; (i) Integrated Supply Chain and Physical Trade; (ii) Market Trade and Business Support; and (iii) Production and Processing.

OUR SUPPLY CHAINS

Our supply chains cover origination, primary processing, export, secondary processing and merchandising globally.

We acknowledge that we operate worldwide in a number of high risk countries for modern slavery and human trafficking. In addition, we employ temporary and seasonal workers which further increase the risk of us operating a supply chain susceptible to modern slavery or human trafficking. We continuously work with our business partners and clients around the world to eliminate modern slavery or human trafficking from our supply chains.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In order to become the preferred buyer for our suppliers and preferred seller for our clients, ECOM seeks to comply with applicable laws and to work with farmers to improve crops over the long term. This goes hand in hand with compliance with modern slavery laws around the world, including the UN Guiding Principles on Business and Human Rights (“**UNGPs**”). This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our policies state that the ECOM Group will not employ forced labour, which is defined as involuntary or compulsory labour, such as indentured labour, bonded labour or similar labour-contracting arrangements. Our managers are responsible for ensuring that employees under their supervision are familiar with our policies and for promoting compliance. We make enquiries of our suppliers about the possibility of the existence of forced labour within their supply chains and work to eliminate the same.

Together with a number of international companies, ECOM has a strategic ambition to improve the livelihoods of farmers and their economic opportunities by increasing productivity and advancing community development. The focus on improving communities will help to reduce any instances of modern slavery.



OUR TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide annual training to our staff through ECOM's Sustainable Management Services ("SMS") initiatives at origin level and at other points in the supply chain. SMS looks to improve farmer yields through improving farming practices and/or the introduction of certifications or traceability programs. Not only does certification or verification improve farmer profits but it also allows our customers to rely on the traceability of the cocoa and coffee beans in their supply chains. In addition, we are raising awareness internally of our SMS activities and associated SMS Code, ECOM Supplier Code of Conduct and general approach to the eradication of modern slavery through training aimed at top and middle management globally.

OUR DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place a Social Environmental Management System ("SEMS") to ensure that our:

- sustainable practices are aligned with and support our business objectives;
- own facilities are compliant with legal requirements and international expectations;
- procurement supports improvement in production and discourages unsustainable and inappropriate practices. We anticipate and mitigate negative social and environmental consequences of our business and that affect our business.

SEMS is a management tool used globally within ECOM to assess environmental, safety and social compliance of owned or operated locations and details on environmental and social issues in the supply chain.

OUR SUPPLIERS' ADHERENCE TO OUR VALUES

ECOM does not tolerate any forms of slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a Supplier Code of Conduct. It goes beyond compliance with the law and aims to advance social and environmental responsibility, and highlights our commitment to eradicate modern slavery and the expectation on our suppliers to maintain the same high standards. By accepting our Supplier Code of Conduct, ECOM is entitled to audit a supplier's practices to ensure compliance. If a violation of ECOM's Supplier Code of Conduct is identified during one of ECOM's monitoring exercises, ECOM has the power to terminate the business relationship.

ECOM will avoid buying from and selling to parties discovered to be acting in violation of national environmental and social legislation (specifically including improper labour practices).

SUSTAINABILITY AND TRACEABILITY

Certification or verification against widely accepted schemes for sustainable agriculture is viewed by ECOM as one of the most effective ways to advance the supply of sustainable products. ECOM works with certification schemes and encourages the development of supply of certified production. This enables ECOM to be confident that suppliers certifying sustainable practices are using ethical and accepted methods; for example, Fairtrade strictly prohibits slave and child labour. Other certification schemes that ECOM works with include UTZ/Rainforest Alliance, several Organic certified cocoa and coffee schemes,



CAFE Practices and several other bespoke and niche schemes. ECOM also implements programs that have similar credit/verification schemes, including Mondelez' Cocoa Life, Nestlé's Nestlé Cocoa Plan (“**NCP**”) and Lindt Verified, which are all verified by a third party. Our SMS initiatives seek to expand the use of certifications and traceability primarily within the coffee and cocoa markets. The SMS programs look to recruit farmers to programs backed by ECOM and its clients. Through SMS programs at origin level, SMS looks to improve farmer yields through technical support, and provision of equipment, thus improving farming practices. The SMS programs focus on certification and/or traceability, which allow transparency of our SMS supply chains, and in our view, are a highly effective way to eliminate modern slavery and human trafficking from our supply chains.

DEVELOPMENTS

ECOM continues work to prevent modern slavery in our business and supply chains. Examples of these include:

- ECOM actively participates in, and contributes to, various organizations and initiatives that are attempting to eradicate abusive child labour. For example, ECOM is a founding member of two Jacobs Foundation-led innovative pooled funding facilities designed to address some of the underlying causes of child labour in the Ivory Coast: Children's Learning and Education Facility (“**CLEF**”) and Early Learning and Nutrition facility (“**ELAN**”).
- ECOM is an active participant in cocoa industry initiatives with numerous leadership roles, as well as being a signatory of various pre competitive sector initiatives. ECOM is a signatory to two voluntary national initiatives, namely the Swiss Platform for Sustainable Cocoa and Beyond Chocolate (the Belgian initiative for sustainable cocoa); both of these include targets related to the eradication/reduction of child labour.
- ECOM draws on high level expertise and local experience to ensure monitoring systems and engagement are at the highest level. As examples, ECOM is a board member of the World Cocoa Foundation (“**WCF**”) and the International Cocoa Initiative (“**ICI**”). ICI works to improve the lives of children in cocoa-growing communities by supporting the acceleration and scale-up of child-centred community development and responsible supply-chain management throughout the cocoa-sector. ICI aims to safeguard child rights and contribute to the elimination of child labour through innovation, through the development, application and promotion of good practices, and through the building of partnerships. ECOM works closely with ICI to train our staff, implement Child Labor Monitoring and Remediation System (“**CLMRS**”) as well as to take advantage of the learnings of their programs on child labor and more recently forced labor.
- ECOM has systems in place for avoiding purchasing coffee from any farm on Brazil's Transparency List on Contemporary Slave Labour.

WHISTLEBLOWING

ECOM has a procedure in place for resolving complaints (both internal and external), including those relating to modern slavery. ECOM will process any such complaint in line with this procedure. It is our stated intent that complainants be acknowledged and taken seriously; there is a mechanism in place to allow for the protection of a complainant and for any complaint to be made and handled anonymously. ECOM's external complaints resolving policy (“**Ethics Concerns Policy**”) is publicly available on our website.



OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- A periodic programme of internal audits is conducted to ensure that local policies align with ECOM Group policies;
- Spot checks for suppliers in higher risk countries; on the basis that it is not feasible to audit every supplier;
- Third party certification audits such as those listed above (UTZ/Rainforest Alliance, Fairtrade, etc.).

ECOM relies on a combination of these third party certification and verification audits, external client visits, surprise staff visits and long term engagement with ECOM's suppliers in order to monitor compliance with our Modern Slavery Statement and the implementation of ECOM's Supplier Code of Conduct throughout the supply chain. ECOM's suppliers are aware that, without notice, ECOM can assess compliance with this Code at any time. If a violation of ECOM's Supplier Code of Conduct is identified during one of ECOM's monitoring exercises, ECOM has the power to terminate the business relationship.

We are satisfied with the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains and we intend to continue these steps to continue to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the UK's Modern Slavery Act 2015, the US's Trade Facilitation and Trade Enforcement Act 2015, the California Transparency in Supply Chains Act 2010 and the UNGPs, and it constitutes the ECOM Group's slavery and human trafficking statement for the financial year ending 31 December 2019ⁱ.

Approved by the board of directors of ECOM Agroindustrial Corp. Ltd on 12 October 2020 and signed on its behalf by:

Ramon M. Esteve III

Director

Date: 12 October 2020

ⁱ This statement applies to all the subsidiary organisations of ECOM Agroindustrial Corp. Ltd (details of which can be found on our website (<https://www.ecomtrading.com/global-offices>)), including the UK entities East Africa Coffee Co. LLP, ECOM Agrotrade Limited, ECOM Agrotrade Holdings Limited, Keynote Coffee Limited and Mercanta Limited.