

MODERN SLAVERY AND HUMAN TRAFFICKING ANNUAL STATEMENT FOR THE 2025 FINANCIAL YEAR

Published June 2026



This Modern Slavery and Human Trafficking Annual Statement is produced by UCC Coffee UK Ltd in accordance with section 54 of the UK Modern Slavery Act 2015. The Statement outlines the steps we have taken to mitigate modern slavery and human trafficking risks in our business operations and supply chains during the year ending 31 December 2025. Our previous Statement can be accessed [here](#).

1. Our organisation and supply chains

Our organisation

UCC Coffee UK Ltd is the leading Total Coffee Solution provider within the UK and Ireland retail, hospitality and foodservice markets. We are headquartered in Milton Keynes, UK, and employ over 530 members of staff. We create and manage coffee experiences tailored to customers' needs, including own branded and bespoke private label coffee blends; supply and service of professional coffee machines, coffee consumables, beverage equipment and ancillary products; and provision of customer training and market insight support. More information about our business can be found at <https://ucc-europe.com/markets/uk-ireland/>.

UCC Coffee UK Ltd is a subsidiary of UCC Europe Ltd (together, 'UCC'), a leading private label coffee business, headquartered in London, with operations in France, the Netherlands, Spain, and Switzerland. Operating within a European group enables UCC Coffee UK Ltd to leverage expertise, innovation, and experience in coffee to deliver market-leading products and services.

UCC Europe Ltd is a subsidiary of UCC Holdings Pte. Ltd Singapore, the ultimate parent company of UCC.

Our supply chains

UCC Coffee UK Ltd takes pride in delivering our industry-leading Total Coffee Solution. This is supported by a diverse number of supply chains that vary in terms of products, geographies, spend and the level of influence we have upon them. Our supply chain and procurement activities fall mainly into the following areas:

- Sourcing raw green coffee from approximately 15 producing origins across Central and South America, Asia and Africa, through our European coffee procurement centre in Switzerland (UCC Coffee Services Switzerland). Our Tier 1 suppliers are predominantly coffee trading companies, based in both European countries and production countries.
- Purchasing of packaging materials, and other factory-related ingredients, goods, and services (including utilities) essential to the manufacture and distribution of our product range. Our suppliers for these goods and services are located within Europe, predominantly locally in the UK and Ireland.
- Procuring, distributing, and servicing professional coffee machines and beverage equipment, including associated spare parts and ancillary products such as machine cleaning products. Suppliers for these products are globally located, with manufacturing facilities in Switzerland, Italy and China.
- Indirect procurement of goods and services. Examples include legal and professional services; vehicle lease contracts; facilities management services; and finished side products and consumables to support our Total Coffee Solution.

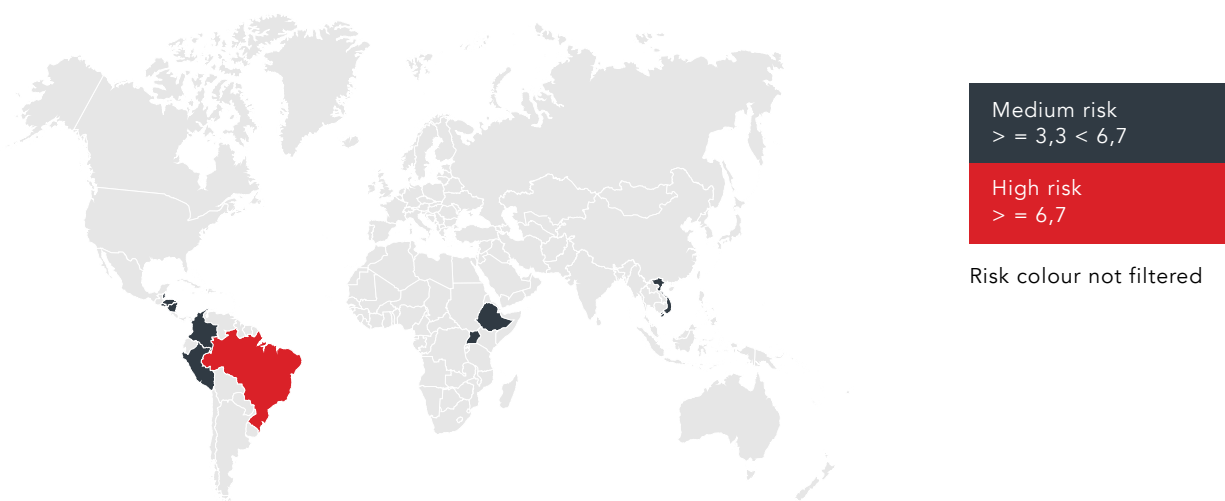


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The map below shows our key coffee sourcing countries (from which >1% of green coffee is sourced from) and the associated forced labour risk (source: Rainforest Alliance Child Labor and Forced Labor Risk Maps, 2025).



2. Our commitment

UCC Coffee UK 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 Coffee UK Ltd and UCC Europe Ltd. We are guided by the principles and standards set out below.

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. These commitments are formally reflected in our Human Rights Policy and Supplier Code of Conduct.

3. Our policies and governance structure

UCC Coffee UK 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 2025, 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. Examples of the steps we have taken are set out throughout this Statement. 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.

3.1. Human Resources Policies

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. Our policies are reviewed every three years.

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, every week or quarter depending on the location, ensure these policies are effectively implemented and safeguarded, and specific governance committees meet regularly to review internal policy and strategy in action. The Human Resources Department oversees strengthened control measures, such as the onsite management agency worker interviews and whistleblowing helpline, and during 2025, no issues were identified. In 2026, we are planning to conduct a review of risks and mitigation measures associated with third-party recruitment, including recruitment undertaken directly and through agency providers.

3.2. UCC Europe Supplier Code of Conduct

Our UCC Europe Supplier Code of Conduct governs 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 is also included in our standard purchase terms and is part of our contract template.

In 2025, we updated our Supplier Code of Conduct to strengthen our standards on human rights and responsible employment. We also drafted an implementation plan to guide our internal teams on how to monitor and implement the standards included in the Code and how to provide support to suppliers for addressing issues effectively.

In the same year, we also updated our Code of Ethics and Behaviours to enhance the provisions on workplace standards and ethical working practices. 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.

3.3. Additional policies and codes

Additional policies include:

- UCC Holdings Purpose and Values
- UCC Holdings 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.



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3.4. Governance

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 address challenges that arise. Furthermore, the Board of Directors of UCC Holdings is responsible for observing the UCC Group's commitment to human rights, 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.

UCC's human rights due diligence approach is informed by an independent review of our policies, governance and due diligence processes against the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Responsible Business Conduct. The findings from this review have been used to identify gaps, prioritise improvements and develop a roadmap for strengthening our approach to human rights due diligence. We continue to use this roadmap to guide practical actions across our policies, supplier due diligence processes, training, governance and remediation work.

As a member of SEDEX (Supplier Ethical Data Exchange), the roastery of UCC Coffee UK Ltd completes an annual self-assessment questionnaire to assess our ethical, health and safety, and employment practices and the site undertakes biennial SMETA 4-pillar audits. A continuous improvement approach is taken to minimise the occurrence of non-conformances.

UCC Coffee UK Ltd 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 2025, 95.9% of the green coffee sourced by UCC Coffee UK Ltd. 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.

UCC Europe is planning to refresh the supply chain mapping and, jointly with UCC Coffee UK Ltd, to map the non-coffee supply chain. The objective of this exercise is 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.

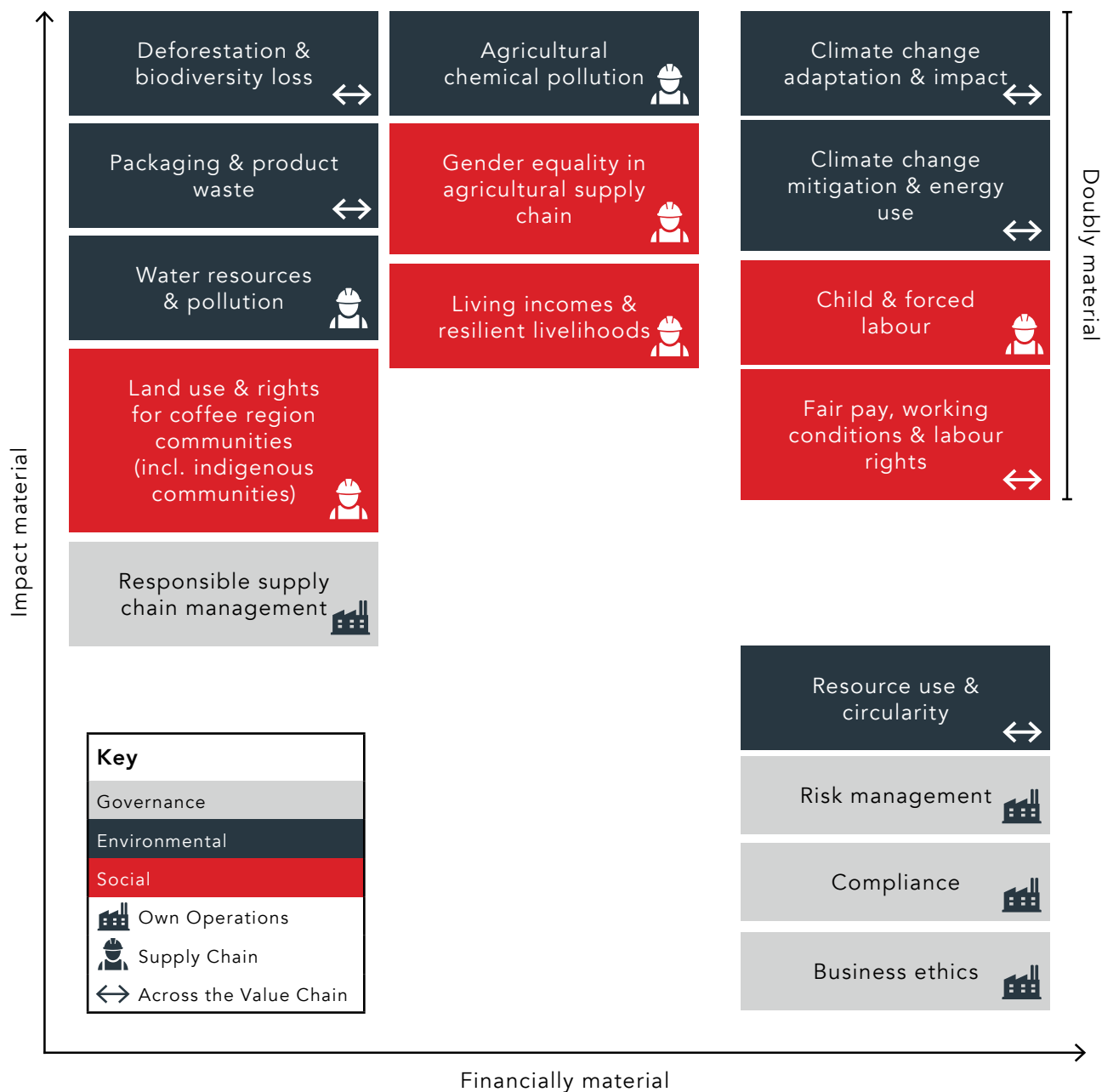
If, through our supplier due diligence process, we identify a supplier who does not have adequate modern slavery risk management processes in place, the supplier will be sent corrective actions to strengthen processes and mitigate any risk. We will also work with the suppliers in question to remediate modern slavery issues and support them, as necessary. Further details on our supplier risk assessment process and how we respond to identified risks can be found under Section 5.2.3: Supplier Risk Assessment.

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 undertaken 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.

The buying team visits tier-one suppliers and other suppliers on a regular basis. During the reporting period, the buying team visited Uganda and Vietnam, and documented reports from those visits. Insights from supplier visits continue to inform company decision-making and support UCC's understanding of risks and practices in key sourcing regions.

5. Risk assessment and management

As part of UCC's CSRD double materiality assessment, child and forced labour, fair pay, working conditions and labour rights were identified as doubly material topics. This means they were assessed as material both from an impact perspective and a financial perspective. These findings reinforce the importance of modern slavery and broader human rights risks within UCC's value chain, particularly in agricultural supply chains.



The outputs of the materiality assessment are used alongside other risk inputs, including human rights risk assessment findings, supplier self-assessment responses, country and sector risk data, certification and traceability information, grievance data and supplier engagement insights. Together, these inputs inform how UCC prioritises risks, identifies higher-risk suppliers or sourcing contexts, and determines where further due diligence, supplier engagement, corrective actions or monitoring may be required.

5.1. Risks associated with recruitment

We recognise that temporary, agency and migrant workers can be more vulnerable to modern slavery risks. In 2025, temporary, agency or contract labour made up less than 1% of the UCC Coffee UK Ltd workforce. Based on UCC's group-wide human rights risk assessment, the risk of modern slavery in our employment practices has been assessed as low. We nevertheless maintain controls to manage residual risk linked to temporary and agency labour, including:

- Supplier due diligence checks before agencies are onboarded;
- Confirmation that labour providers hold the required Fair Work Agency licence, with copies kept on file;
- Review of agency terms of business, including worker pay rates and associated costs;
- Annual ethical and health and safety audits of agency sites; and
- Random monthly interviews with agency workers to identify any modern slavery indicators.

Our Human Resources department also maintains internal policies and processes to confirm that employees are of legal working age and to address any suspected employment rights issues.

5.2. Risks associated with our supply chain

5.2.1. Human rights risk assessment at the group level

In 2024, the UCC Group conducted a group-wide human rights risk assessment, informed by the UCC Group Human Rights Policy, to evaluate the potential human rights impacts connected to its business activities and value chain. The assessment considered the business areas most likely to involve significant human rights risks and examined who could be affected, which rights could be impacted, and where risks may arise across relevant parts of the value chain.

The assessment drew on several sources of information, including previous supplier self-assessments, desktop risk analysis, country and sector risk indicators, and interviews with stakeholders across the value chain, including individuals from our procurement and human resources teams, NGOs, and farmer's union. Based on this information, UCC assessed the severity and likelihood of identified risks, considered UCC's connection to potential impacts, and prioritised the human rights risks requiring further action. Forced labour and child labour were evaluated as high-priority issues, although the risks differ depending on the country of origin.

UCC is committed to repeating the group-wide human rights risk assessment on a three-year cycle, with the next assessment expected to take place in 2027. In the interim period, the findings of the 2024 assessment have been developed into specific action plans, which are being used to guide UCC's human rights due diligence priorities, risk mitigation activities and continuous improvement roadmap.

5.2.2. Identified high-level risks for green coffee

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



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High-level risks for the coffee-sourcing regions were identified using a combination of third-party assessments and desk-based research. These assessments identified several origins that pose a higher risk of modern slavery and forced labour:

GRAS Risk Analysis Results ¹	
Country*	Forced labour and modern slavery risk level
Brazil	Substantial
Colombia	Substantial
Ethiopia	Substantial
Honduras	Substantial
Nicaragua	High
Peru	Substantial
Uganda	Moderate
Viet Nam	Moderate

*Countries from which >1% of green coffee is sourced from.

1: Global Risk Assessment Services (GRAS) German Coffee Association Country and Sector Specific Abstract Risk Analysis Summary Report October 2025.

UCC uses this data to monitor country-level risk across its coffee sourcing origins and to identify whether there are material changes in the risk profile of sourcing countries over time. The data provides an indication of inherent country and sector risk and supports UCC's broader understanding of where modern slavery and related human rights risks may be more likely to arise.

At present, this information is used as a contextual risk monitoring tool alongside other sources of information, including supplier assessments, certification and traceability information, and supplier engagement.

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.

Green coffee sourcing is managed by our European procurement centre, UCC Coffee Services Switzerland (UCCCSS), which is approved under the BRCGS Global Standard for Agents and Brokers. UCCCSS takes a supplier relationship management approach, including working with suppliers with integrated supply chains, where possible, to support greater upstream visibility and traceability, and with specialist importers that work directly with producers.

The UCC Europe Supplier Code of Conduct has been included in green coffee sourcing contracts since 2021. Our BRCGS Global Standard Food Safety-accredited roastery also operates supplier approval and risk assessment procedures. As part of this process, we request Modern Slavery and Ethical Trading Policies from suppliers and expect suppliers to support safe, legal and fair working conditions, alongside required quality and food safety standards. Relevant ethical policies are also displayed in key employee rest locations, including staff rest areas.

5.2.3. Supplier Risk Assessment

To help control the risks associated with the green coffee supply chain, our European green coffee procurement centre (where UCC UK Ltd Coffee is sourcing from), 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



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- Conducting field visits during annual origin visits
- A supplier performance assessment process

During the reporting period, UCC conducted an EUDR pre-audit risk assessment covering all coffee suppliers. The process was designed to assess suppliers' existing systems, identify gaps and support compliance with the European Union Deforestation Regulation, including its legality requirements. While the EUDR is primarily focused on deforestation we included in the assessment's consideration of applicable laws in the country of production, including requirements relevant to human rights and child labour.

Suppliers completed a pre-audit questionnaire based on the European Coffee Federation industry-standard template, covering management systems and policies, geolocation data, traceability, risk assessment procedures, risk mitigation measures and legality. Responses and supporting documentation were reviewed to identify inconsistencies, information gaps and procedural weaknesses. Suppliers with amber or red flags were subject to follow-up engagement to clarify responses, review risk issues and agree actions where further mitigation or documentation was required.

As a next step, we will build on the learning from the EUDR pre-audit risk assessment by strengthening our wider supplier management process. This will include developing a more consistent approach to supplier onboarding, risk assessment, supplier engagement, corrective action management, escalation and ongoing monitoring. We will also review and strengthen our human rights due diligence self-assessment questionnaires, so that supplier responses can be assessed consistently and translated into appropriate follow-up actions where required. We will also strengthen the supplier management process so that third-party country and sector risk data is more consistently incorporated into supplier onboarding, HRDD self-assessment questionnaires, risk assessment, corrective action management and ongoing monitoring.

UCC will conduct a further round of human rights due diligence assessments for selected non-coffee suppliers, using a risk-based approach to determine which suppliers should be prioritised. These assessments are conducted less frequently than coffee supplier assessments, reflecting the higher inherent human rights risks associated with the coffee supply chain. The process will help UCC maintain proportionate oversight of human rights risks in its non-coffee supply chain and identify where further engagement, information requests or corrective actions may be required.

As the distributor of leading professional coffee and beverage equipment brands, UCC Coffee UK Ltd has long-standing and collaborative relationships with original equipment manufacturers (OEMs). These OEMs are mainly located in the UK, Switzerland, Italy, the USA and China 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.

5.3. Reporting mechanisms

The UCC Europe 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.

Safecall is our appointed 3rd party whistleblowing hotline provider. This hotline enables our employees to 'Speak Up' and report their concerns anonymously. 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. The mechanism is also accessible to our suppliers for reporting suspected violations of our Supplier Code of Conduct.

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 Group developed and is currently implementing a Remediation Protocol (the Protocol). 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 Remediation Protocol is comprised of two parts: a Standard Operating Procedure, which sets out the structured process for managing adverse human rights impacts, and a Remediation Guidance Document, which provides additional context, practical examples and remediation scenarios to support effective implementation in line with international standards. UCC is also developing a response procedure to support a structured approach where potential human rights impacts are identified through NGO or media reports, grievance channels, supplier reporting, due diligence processes or other sources. The procedure is intended to guide how concerns are reviewed, investigated, escalated, and, where appropriate, remediated. It will also support consistent documentation of actions taken, roles and responsibilities, decisions made, supplier follow-up, engagement with affected stakeholders and any further monitoring required.

6. Raising awareness

Our Modern Slavery training strategy continued to be developed through 2025 to further enhance people’s learning and understanding of modern slavery and help mitigate and eradicate forced labour across society.

UCC Coffee UK Ltd strives to ensure all employees receive some form of training or awareness building on modern slavery.

In 2025, we partnered with Learning Pool, our new training supplier, to provide our employees and managers with more in-depth online training on modern slavery. During the year, 233 employees completed the new modern slavery training. Refresher training is provided on a 3-year cycle.

Engagement with industry forums and federations such as the European Coffee Federation and Global Coffee Platform also provide a means of external communication and inter-company information sharing.

7. Measuring effectiveness

The table below provides a brief overview of our progress towards the forward-looking goals outlined in our 2024 statement:

Continuous Improvement Goals	Progress Summary
Maintain at 96% or increase the proportion of coffee sourced from certified schemes, in association with customer and own brand needs.	Achieved in 2025
Continuously improve our supplier risk management including onboarding of Tier 1 suppliers with SEDEX, strengthening and standardising our supply chain risk assessment capabilities.	Partially achieved, continuous improvement goal for 2026
Continue to apply our controls associated with temporary labour and keep reliance on temporary labour below 1% of the workforce.	Achieved in 2025

Maintain focus on Modern Slavery training and awareness including – a. Continue to refresh awareness among existing employees. b. Ensure all new starters complete the introductory Modern Slavery training.	Achieved in 2025
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The table below provides a brief overview of our future objectives and ways to measure progress:

Focus area	Objective	How we will measure progress
Governance	Social Compliance Working Group established and operating effectively	– Working Group launched. – Meetings held during the reporting period.
Policies	Embed the new Supplier Code of Conduct	– Percentage of in-scope suppliers issued with the updated Supplier Code of Conduct. – Percentage of in-scope suppliers that have acknowledged, signed or otherwise confirmed acceptance of the updated Supplier Code of Conduct.
Due diligence and risk assessment	Supplier management process developed	– Supplier management process developed, covering onboarding, risk assessment, supplier engagement, corrective actions, escalation and ongoing monitoring.
	Enhance supplier risk assessment	– Percentage of in-scope coffee suppliers and higher-risk non-coffee suppliers assessed through the relevant supplier risk assessment process.
	Follow-up engagement with higher-risk suppliers	– Number and percentage of assessed suppliers identified for follow-up engagement, additional information requests or corrective actions.
Training	Targeted HRDD training completed by relevant roles	– Percentage of relevant procurement, sustainability, HR, operations and leadership roles completing targeted training on human rights due diligence. – Number of working group members trained on B&HR introductory e-learning provided ISEP approved training through Ardea International.

During the next reporting period, UCC will begin collecting baseline data against the indicators set out above. This will allow us to better understand current performance, identify where data collection processes need to be strengthened, and develop appropriate targets for future reporting. In next year's Statement, we intend to report against this baseline data and, where appropriate, include targets to support ongoing improvement.

Approved by UCC Coffee UK Ltd Board and signed by Eser Sevinc, General Manager, UCC UK Ltd.




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