

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 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 2025.

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 the 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 14 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.

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).



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Medium risk
 $\geq 3,3 < 6,7$

High risk
 $\geq 6,7$

Risk colour not filtered

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 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 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 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.

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 adopt a Recruitment Protocol in response to identified risks associated with third-party recruitment, including recruitment undertaken directly and through agency providers. The Protocol will formally communicate UCC's expectations and provide guidance to employees who interact with agency providers and any subcontracted workers. It will set out principles that underpin the minimum standards expected of agency providers and relevant employees, supporting more consistent oversight of agency relationships and helping UCC to cease, prevent and mitigate human rights risks connected to third-party recruitment.

3.2. 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 to address 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 Group's commitment to human rights, overseeing its efforts and receiving reports on the progress of important issues.

In 2025, we revised the scope and launch plan for the Social Compliance Working Group. The group has not yet formally launched; however, it is expected to be launched shortly following pre-launch stakeholder engagement. As part of this process, we refined the proposed membership of the Working Group to better reflect the breadth of the business and to include stakeholders who are well placed to provide meaningful input and support progress on social compliance. This preparatory work is intended to ensure that, once launched, the Working Group can provide an effective forum for cross-functional discussion, strategy development and decision-making on human rights, modern slavery and wider social compliance matters.

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 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 2025, more than half (52.2%) 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.

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.

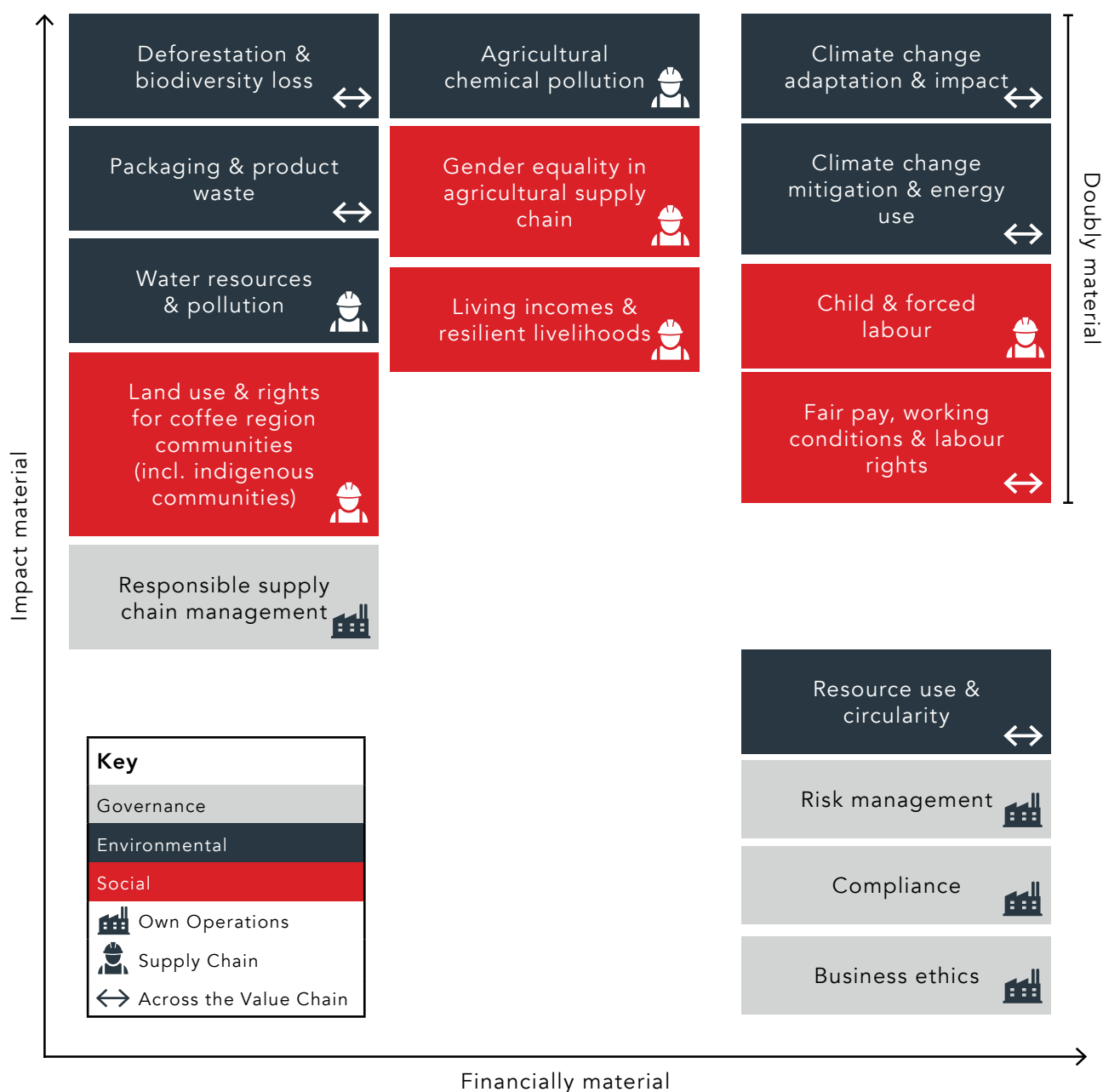
If, through our supplier due diligence process, we identify a supplier who does not have adequate modern slavery risk management processes in place, the supplier will be sent corrective actions to strengthen processes and mitigate any risk. We will also work with the suppliers in question to remediate 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, and gender equality in the agricultural supply chain 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

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

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.

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.

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 child labour and the worst forms of child labour per ILO Convention C182. These include*:



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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.

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.

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
- 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 and forest degradation, its legality aspects also require

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 against a scoring system 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 its 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 Europe 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 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.

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.



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5.4 Remediation

The UCC Group developed and currently implements 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.

To build awareness and understanding of modern slavery, a subsidiary of the Company, UCC Coffee UK Ltd, partnered with Learning Pool, a training supplier, to provide its employees and managers with 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.

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.

Engagement with industry forums and federations, also provide a means of external communication and inter-company information sharing. These include:

- Global Coffee Platform (a Sustainability-led multi-stakeholder initiative)
- Industry associations:
 - ECF (European Coffee Federation)
 - SCTA (Swiss Coffee Traders Association)
- AECafe (Spanish Coffee Association)
- Koffie and Thee Nederland;
- DKV (German Coffee Association);
- Procafé (Swiss Coffee Industry Association).



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7. Measuring effectiveness

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 below. 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 Europe Ltd and signed by Sato Tsukasa, CEO, UCC Europe Ltd.

