

**Financial Year 2022-23** (1st April 2022 – 31st March 2023)

## **United Molasses Group Limited Modern Slavery and Human Trafficking Statement**

### **Background**

United Molasses Group Limited is a non-trading parent company of a group of businesses focused on the global trading and marketing of molasses and related products and the storage of bulk liquids (together the **United Molasses Group**). The Group's ultimate parent company is W&R Barnett Holdings Limited.

Section 54 of the United Kingdom's Modern Slavery Act 2015 ('the Act') encourages increased transparency within businesses and supply chains. Section 54(1) of the Act places a statutory obligation on commercial organisations, in any part of a group structure, that supply goods or services with an overall turnover of £36 million or more to produce a "slavery and human trafficking statement" for each financial year. Such an organisation has an obligation to produce a statement within 6 months of their financial year-end, indicating their position, policies and due diligence in relation to modern slavery and human trafficking.

This is our eighth year of producing Modern Slavery statements for entities within our group, with the most recent statements being prepared for signature on 29<sup>th</sup> September 2023 for the reporting period of 1st April 2022 – 31st March 2023. These statements are published in accordance with the Modern Slavery Act 2015 and set out the steps and measures taken by the United Molasses Group during the financial year 1st April 2022 – 31st March 2023 to seek to prevent modern slavery in its business and, to the greatest extent possible, in that of its supply chain.

### **Policy Statement**

United Molasses Group Limited remains committed to ensuring that modern slavery and / or human trafficking does not occur within our business and, to the best of our ability, in our supply chain or in any part of our business that falls within the scope of the United Molasses Group audit sample. Our policies and our interaction with colleagues, as well as suppliers and customers, continues to reflect our commitment to acting ethically in all our operational matters. We continue to review our approach annually, striving to ensure that we act in compliance with the Modern Slavery Act 2015 and we continue to monitor such compliance.

### **Due Diligence**

As part of our modern slavery due diligence, the past year has seen an increased focus on ensuring a coherent understanding of modern slavery legislation across the various Senior Management and Director groups. In addition, we are aware that each of the companies within the United Molasses Group that fall within the scope of the Modern Slavery Act 2015 have taken the following steps:

1. Undertaken a risk assessment of areas within their businesses and supply chain, with a particular focus on child labour, forced labour, health and safety, workers' rights, diversity and inclusion and the payment

of the minimum wage in accordance with national standards. The risk areas were identified using the latest data published on the [2023 Global Slavery Index](#).

2. Taken steps to assess and manage the risks identified including:
  - a. Auditing their supply chain;
  - b. Issuing a new Environmental, Social and Governance ('ESG') Policy and establishing an ESG Committee to manage risks;
  - c. Introducing a new internal online training package in relation to modern slavery and human trafficking. This training is now mandatory for all members of staff and is a part of the induction process for new start employees;
  - d. Complying with their Slavery and Human Trafficking Statement;
  - e. Complying with the Group's Anti-Slavery and Human Trafficking policy; and
  - f. Ensuring that modern slavery and our response to such is a regular agenda item for each Board's consideration.

### **Assessing and managing risk**

The United Molasses Group Limited acknowledges that the greatest risk of modern slavery occurring within the Group is via our supply chain. As such, each entity within the United Molasses Group that falls within the scope of the Modern Slavery Act 2015 is responsible for producing its own annual modern slavery statement and report and each company reports their own compliance to the United Molasses Group. This report is based upon their own internal audit and risk assessment of their business, which seeks iterative improvement year on year.

### **Effectiveness of our procedures**

For the financial period 1st April 2022 – 31st March 2023, all companies within the United Molasses Group that are within the scope of the Modern Slavery Act 2015 have confirmed their compliance with section 54 of the Modern Slavery Act 2015 and have published statements in their own right.

### **Policies**

We are committed to addressing modern slavery and ensuring ethical compliance, and have developed policies that reflect the values that we adhere to as a business. This includes an ESG Policy, a Whistleblowing Policy, an Anti-Slavery and Human Trafficking Policy and online training on such policies. These policies are made available within our staff handbook, and provide both an explanation of our obligations in regard to Modern Slavery, as well as a safe reporting mechanism for whistleblowing. The provision of these policies reinforce the need for effective systems and controls and seek to ensure, as far as possible, that modern slavery is not taking place anywhere within our own business. Relevant policies can be made available to third parties on request.

### **Training**

We have developed training for our staff on the issue of modern slavery and human trafficking within our business and supply chains and have delivered that training to the Senior Executive and Senior Management team already. We have also developed a new online training platform for our staff on the issue of modern slavery and have



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delivered that training to all members of UMG. The purpose of this training is to ensure that our employees have an understanding of modern slavery which may occur in our business or supply chain.

United Molasses Group Limited acknowledges our responsibilities in relation to ethical business activity and tackling modern slavery within our supply chain and business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in relation to the financial year and reporting period of 1st April 2022 – 31st March 2023. This statement was reviewed and approved by the Board of United Molasses Group Limited on 28th September 2023.

A handwritten signature in black ink, appearing to read 'Ben Macer'.

Ben Macer  
Chief Executive Officer  
United Molasses Group Limited  
29<sup>th</sup> September 2023

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