



**Slavery and Human Trafficking Statement 2017/2018**

**Dated: 29 June 2018**

This statement is made by Olam International UK Limited on behalf of itself and its wholly owned subsidiaries (“**Olam**”, “**us**” or “**we**”) including Olam Europe Limited, pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Statement**”).

As a leading agri-business operating from seed to shelf in 66 countries, supplying food and industrial raw materials to over 22,000 customers worldwide through a team of 72,000 full-time, seasonal, contract and temporary employees, we have zero tolerance for slavery or human trafficking in our organisation and industry. We are committed to maintaining our work, as a global leader in many food and industrial raw material businesses, and engaging with others including suppliers, interest groups and Governments, to eliminate abuses in the labour markets where Olam operates or has influence.

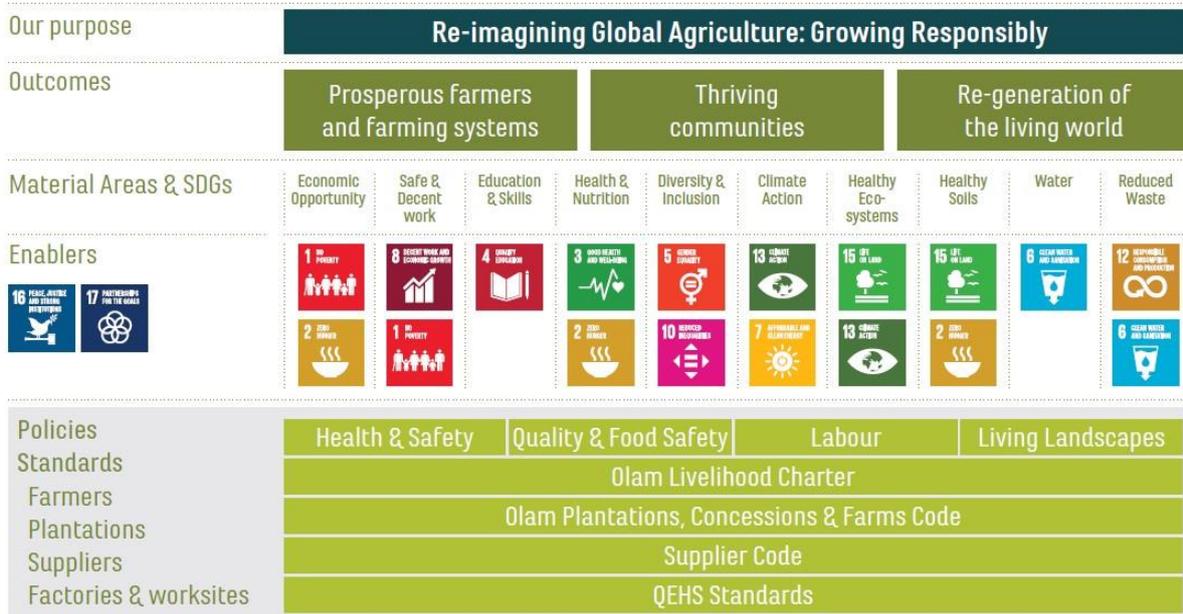
**Re-imagining Global Agriculture: Growing Responsibly**

In 2017 our Core Purpose was relaunched to better address the intractable problems facing global agriculture today, from climate change to water scarcity, impoverished farmers to child labour. We recognise that we need to fundamentally *re-imagine* the global agricultural system so that it works for people and planet. Within this, we have retained the *Growing Responsibly* element of our Core Purpose, as it describes how we do business every day. It binds our business units, geographies and functions to living this ethos. We believe in embedding sustainable practices across every section of our supply chain.

Re-imagining global agriculture : Growing Responsibly		
<b>What are we on fire about?</b>	<b>How do we conduct our business?</b>	
Re-imagining Global Agriculture	Growing Responsibly	
<b>What do we want to achieve?</b>		
Prosperous farms and farming systems	Thriving communities	Re-generation of the living world

Importantly, our London office serves as Olam’s global headquarters for our dedicated Corporate Responsibility and Sustainability (“CR&S”) function spanning the global Olam business and all subsidiaries including Olam Europe Limited. In early 2018, we refreshed our global CR&S framework in 2017 to integrate our new purpose with our 10 new Material Areas, and the UN SDGs that these key material areas will impact. We have also now mapped and aligned our Material Areas (our focus areas) to the 9 Planetary Boundaries. In this exercise, we added certain Material Areas that were missing from the Planetary Boundaries framework and removed certain other overlapping areas. This means that instead of our 2016/2017 Material Areas Livelihoods and Labour we now have: Economic Opportunity; Safe and Decent Work; Education & Skills, and Diversity & Inclusion. These apply either directly, or indirectly in our supply chains. We report on progress in meeting our goals in our [Annual Report](#) and separate [Global Reporting Initiative Report](#).

## Our CR&S Framework



### Relevant Policies

Olam already has in place a number of policies which are reviewed and improved upon regularly along with all our initiatives which require us to mitigate the risk of slavery or human trafficking occurring in Olam’s business or any of its supply chains. These include:

- [Olam International Code of Conduct](#) - establishing our commitment to growing responsibly including to human rights and standing against all forms of child exploitation, the use of forced labour and abiding by relevant ILO conventions.
- [Olam Supplier Code](#) - establishing a minimum, non-negotiable standard to which all our suppliers must adhere and which supplements our usual due diligence processes.
- [Olam Livelihood Charter](#) – reflecting our commitment to acting ethically and with integrity in all of our business relationships. In particular, working with smallholders to improve economic, social and environmental issues, which include labour practices.
- [Olam Sustainable Palm Oil Policy](#) – reflecting our commitment to human rights and ‘no exploitation’ in our own plantations, as well as our third-party sourcing.

### Our 2017/2018 Progress

Since our first modern Slavery Statement in 2016/2017, we have undertaken a number of significant initiatives to help reduce the risk of negative labour practices in our supply chains. As context, Olam grows, buys, trades and processes over 40 agri-commodities including cocoa, coffee, cashew, hazelnuts, oil palm, rubber, rice and sugar. In our own operations, we employ many workers on our plantations in countries such as Laos, Tanzania and Zambia (coffee) and Gabon (oil palm and rubber). We estimate that we buy crops from an extended network of 4.7 million farmers, the vast majority being in highly fragmented supply chains in emerging markets. While we have direct contact with many, including just under 363,000 smallholders in our flagship sustainability programme the Olam Livelihood Charter, it is impossible for Olam to physically reach 4.7 million. This is why we place such emphasis on the Olam Supplier Code which now covers 70% of our high-risk products as well as working with



industry initiatives such as [CocoaAction](#). The table below demonstrates some of the actions we have taken in the past 12 months to minimise labour risks in our direct and indirect supply chains.

	<b>Action</b>
Olam Fair Employment Policy	<p>Due to be launched imminently, it reaffirms Olam’s commitment at group level to:</p> <ol style="list-style-type: none"> <li>1. Ensuring compliance with all applicable national employment laws and international standards</li> <li>2. Creating a fair and non-discriminatory workplace that provides equal opportunity to everyone</li> <li>3. Establishing, maintaining, and improving the worker-management relationship and ensure employees’ rights to self-representation</li> <li>4. Protecting workers, including vulnerable categories such as migrant workers, and workers engaged through third parties</li> <li>5. Prohibiting the use of child labour and forced labour</li> <li>6. Providing safe and healthy working conditions and promote the health of workers</li> </ol> <p>(Base Principles: ILO guidelines on labour and UNGC on Human rights)</p> <p>Implementation of this policy will include:</p> <ul style="list-style-type: none"> <li>• Audit of prioritised countries with 80% of workforce: Gabon, India, Nigeria, Vietnam, Brazil, Cote d’Ivoire, Republic of Congo, Ghana and Indonesia</li> <li>• Plan of action for each country</li> <li>• Awareness and Communication</li> <li>• Metrics and Reports: Biannual tracking &amp; monitoring of data; Leadership report on key metrics</li> </ul> <p>As part of our ongoing monitoring to ensure human rights are not violated in our places of work, we undertake internal audit conducts spot checks – see the 2017 <a href="#">Annual Report</a> for progress against targets.</p>
<a href="#">Supplier Code</a>	<p>Updated labour and human rights commitment in April 2018. Page 3 details the criteria which includes: i. Complying with the International Labour Organization (ILO) Convention 138 on the Minimum Age of Employment and Convention 182 on the Worst Forms of Child Labour (is a prerequisite when applicable in the relevant jurisdiction). ii. Not using forced, involuntary or slave labour, including but not limited to bonded, indentured, involuntary prison labour, as well as trafficked human beings.</p> <p>Teams on the ground undertake extensive training and briefing sessions to ensure suppliers, intermediaries and buying agents understand the Code. The Living Landscapes Policy (below) outlines the process we take for any suppliers found to be contravening the code.</p>
<a href="#">Olam Living Landscapes Policy</a>	<p>In 2017, we consulted widely with experts and civil society on a forest policy to cover all commodities in Olam’s portfolio. We concluded that a Policy based narrowly on unacceptable land use management practices will not be sufficient to meet the challenges of deforestation and ecosystem degradation. As part of our ambition to re-imagine global agriculture we have therefore adopted a Living Landscapes Policy. We aim to deliver a triple positive impact in the places where we work to create and sustain living landscapes, where profitable farms and plantations, thriving rural communities, and healthy ecosystems coexist. The Policy applies to both Olam-owned and third party supply chains. It states:</p> <p><i>Our requirement for legal and regulatory compliance extends to laws and regulations governing labour rights, human rights, the elimination of exploitation and</i></p>

	<p><i>discrimination, and workplace health and safety, with guidance in the Olam Supplier Code, Health and Safety Policy, Code of Conduct and other corporate policies.</i></p> <p>Going forward, each Olam business will take a risk-based approach to establish strategies and plans appropriate to our role in growing, sourcing, processing and trading each crop and commodity. Time-bound commitments are incorporated into the Policy (2018 and 2020). To ensure successful application of this Policy group-wide we will develop and implement a suitable process to monitor compliance with the Policy. Reporting on progress will begin in the 2018 Annual Report.</p>
<a href="#">Olam Livelihood Charter</a>	Embraced an additional 19,000 smallholder farmers to reach just under 363,000 in 2017 (49 programmes in 21 countries). Training on labour practices, including child labour and worker rights, reached just under 233,000 farmers.
Palm Oil	<a href="#">Sustainable Palm Oil Policy</a> updated in January 2018 to expand on ‘No Exploitation’ labour practice requirements – see page 3 with regard to our own plantations and page 4 with regard to third party suppliers. Explicit statement: <i>Enforce a strict child labour/forced labour rule as defined by ILO standards and national laws. Communicated to suppliers.</i> All grievances (environmental and social) logged on <a href="#">olamgroup.com</a> and investigated with action recorded on the log.
Cocoa	<p>In 2013, Olam became the first agri-business to become a member of the Fair Labor Association (FLA). Olam Cocoa has been working with the FLA to help strengthen processes and monitoring systems, as well as to provide transparency. The reports can be read at <a href="#">www.fairlabor.org</a>.</p> <p>With the support of FLA, manufacturer customers and Rainforest Alliance, Olam Cocoa also conducted a pilot Child Labour Monitoring and Remediation Systems (CLMRS) programme with 3 cooperative suppliers in 2013, after which CLMRS have since been established at over 140 cooperatives in Côte d’Ivoire. Significant investment has also been made in schools and education materials. Read more here: <a href="http://olamgroup.com/products-services/confectionery-beverage-ingredients/cocoa/sustainability/tackling-child-labour/">http://olamgroup.com/products-services/confectionery-beverage-ingredients/cocoa/sustainability/tackling-child-labour/</a></p> <p>And in the Olam Cocoa <a href="#">sustainability report</a>.</p>
Hazelnuts	<p>Olam Hazelnuts has been working with FLA, customer Nestle and competitor Balsu to reduce the risk of labour issues in the migrant workforce during the hazelnut harvest. Estimated as high as 1.5 million, migrants work to bring in the harvest of 400,000 hazelnut farmers, bringing challenges including child labour, wages and working conditions. It is likely these have been exacerbated by the Syrian conflict and refugee crisis with whole families fleeing together and seeking work.</p> <p>Olam Progida works to improve working conditions, as well as help farmers improve yields, which in turn can boost labour wages. The monitoring reports can be found at <a href="#">www.fairlabor.org</a>. In 2017, Olam Progida doubled its sustainability team and developed further social projects with NGOs, local authorities and the International Labor Organization (ILO). Under the Olam Livelihood Charter the sustainability team trained 2,870 farmers in 2017 specifically on labour issues.</p> <p>In June 2018, the FLA launched a series of films explaining the objectives, challenges and achievements of the multi-stakeholder programmes:</p> <ul style="list-style-type: none"> <li>- <a href="#">A Conversation With Nestle: Improving Conditions in the Hazelnut Sector</a></li> <li>- <a href="#">Companies and NGOs Partnered With Turkish Government Officials to Reduce Child Labor</a></li> </ul>

	<ul style="list-style-type: none"> <li>- <a href="#">Migrant Workers in Turkey Describe Their Lives During the Hazelnut Harvest</a></li> <li>- <a href="#">A Conversation with Balsu and Olam, Suppliers to Nestle in Turkey</a></li> </ul> <p>Also with the FLA, Nestle and Balsu, Olam is involved in a <a href="#">specific programme</a> called the “Partnership to Prevent Child and Forced Labor in Imported Agricultural Products: Piloting the USDA Guidelines in Turkey’s Hazelnut Supply Chain,” funded by the United States Department of Labour’s Bureau of International Labour Affairs (USDOL-ILAB). The project seeks to pilot the U.S. Department of Agriculture Guidelines for Eliminating Child and Forced Labour in Agricultural Supply Chains (USDA Guidelines) in the hazelnut supply chain of the project partner companies by strengthening their internal child and forced labour monitoring and remediation system.</p>
Cotton	<p>In 2018, Olam expanded its partnership with FLA to include additional high risk supply chains. This includes cotton in Cote d’Ivoire. Olam has already made significant progress in holistically tackling social and environmental issues in the cotton supply chain as can be seen in this case study from our 2017 Annual Report: <a href="#">Thriving Communities</a>.</p> <p>For several years, Olam has also reported on challenges in the Uzbekistan supply chain regarding child and forced adult labour during the cotton picking harvest. In December 2017 the <a href="#">ILO published a report</a> stating: “<i>The picture emerging to the monitors was one of intensifying efforts to ensure voluntary recruitment. The monitoring and assessment confirms that the large majority of cotton pickers engage voluntarily in the annual harvest. They have received wages which have been increased this year in line with recommendations by the ILO and the World Bank. Furthermore, productivity was comparable to previous harvests.</i>” The report acknowledges however, that more awareness and monitoring is required. Olam will continue to monitor reports on cotton harvesting from Uzbekistan and other cotton producing states in the region.</p>
Fair Labour Association wider programme	<p>In 2018 Olam began exploring a ‘scaling-up plan’ of our internal human and labour rights due diligence programme with the FLA. Progress will be reported in next year’s statement.</p>
Launch of AtSource	<p>In April 2018, Olam launched a sustainable sourcing package for customers which we believe to be one of the most comprehensive in the B2B market.</p> <p><b>AtSource</b> presents manufacturers with rich and granular data through a digital dashboard which tracks the social and environmental footprint of a product. There are three tiers for customers to choose from:</p> <ul style="list-style-type: none"> <li>• <b>AtSource Entry Tier</b> is for products that comply with all Olam policies and the suppliers must have understood and signed the Olam Supplier Code. This minimises key risks for customers at country level and gives reassurance that suppliers are engaged on responsible sourcing principles and practices.</li> <li>• <b>AtSource Plus</b> focuses on identifying opportunities for improvement based on more than 80 indicators across 12 key sustainability topics (including labour issues) starting at farmer group level through to logistics and processing. Example indicators include farmer yields, deforestation and water scarcity. While the framework is rigorous, it allows customers to tailor their interventions based on their specific sustainability priorities.</li> </ul>

	<ul style="list-style-type: none"><li>• <b>AtSource Infinity</b> allows Olam and its customers to co-create programmes to achieve a net positive impact, putting more back into the farming system and the environment than is taken out, working towards a goal of regenerating agricultural and living landscapes at scale.</li></ul> <p><b>AtSource</b> will initially begin with 5 product supply chains, with more gradually coming on board:</p> <ul style="list-style-type: none"><li>• Cocoa and cashew from Côte d'Ivoire</li><li>• Coffee from Brazil and Vietnam, and</li><li>• Onions and garlic from the USA.</li></ul> <p>By 2025, Olam's vision is for 100% of its physically sourced volumes to be AtSource ready.</p> <p>Find out more at <a href="http://www.atsource.io">www.atsource.io</a></p>
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### **Our Continuing Commitment**

Olam recognises that despite this progress, ongoing focus is required by the agricultural sector to ensure that the food we consume and the fibre we wear is produced responsibly and sustainably. We are committed to playing our part, and will continue to work individually as a company, and with multiple partners, to protect children and adults from all forms of slavery, exploitation and the use of forced or trafficked labour.

To access the previous version of our Slavery and Human Trafficking Statement, please click [here](#).

This Statement was approved by the Board of Olam International UK Limited on behalf of all of its wholly owned subsidiaries.



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Gerard Manley

Director, and CEO (Olam Cocoa)

**Olam International UK Limited**