



Modern Slavery and Human Trafficking Statement

5 May 2026

Scope

This Modern Slavery and Human Trafficking Statement (the “**Statement**”) is made by **OFI Group Limited**¹ on behalf of its wholly owned subsidiaries and broader affiliates in the **United Kingdom**² and **Australia**³, together the “**Reporting Entities**” (“**ofi**”, or the “**Group**”).

The Reporting Entities are all 100% controlled by **OFI Group Limited** via other 100% controlled subsidiaries of **OFI Group Limited**.

ofi's (Olam Food Ingredients) approach to modern slavery and human trafficking is consistent across the Group, with policies, approach, risk management, actions and governance being led at a corporate level, which are then tailored, adapted and localized by **ofi**'s subsidiaries as required. In preparing this Statement, the Group consulted with representatives from each of the Reporting Entities. As such, this Statement addresses the actions taken by all Reporting Entities within the Group.

This statement is for the financial year ended 31 December 2025.

ofi subsidiaries in jurisdictions other than the UK and Australia may meet thresholds to report under applicable legislation addressing a similar subject matter in their country. This report meets applicable requirements and all similar reports align with and are consistent with the statements made in this report.

About ofi and its Supply Chains

OFI Group Limited is part of the Olam Group of companies (<https://www.olamgroup.com>) which is a leading food and agri-business supplying food, ingredients, feed and fibre to over 11,000 customers worldwide.

ofi is an operating group born out of the Olam Group, supplying food and beverage ingredients and solutions to customers worldwide. The Group consists of industry-leading businesses of cocoa, coffee, dairy, nuts and spices, as well as an integrated food and beverage solutions platform. **ofi** has global operations in ~50 countries including its own farming operations, farm-gate origination sourcing from approximately 2.75 million farmers, 19 innovation centers and more than 110 manufacturing facilities. Goods are purchased from farmers, transported to processing facilities and then sold to other food manufactures for use in their products. As part of **ofi**'s purpose, to 'Be the change for good food and a

¹ This Statement has been voluntarily prepared by OFI Group Limited on a consolidated basis on behalf of the Reporting Entities.

² Olam Europe Limited is the UK company that meets the thresholds to report against the UK Modern Slavery Act. It is a corporate office within ofi based in London.

³ Olam Orchards Australia Pty Ltd, Reg No.139 442 532 (“ofi Australia”) is a private company incorporated in Australia. Olam Almonds Australia Pty Ltd, Reg No.166 588 772 (“Olam Almonds”) is a wholly owned subsidiary of ofi Australia. ofi Australia meets the threshold to report against the Commonwealth Modern Slavery Act 2018. The registered office address for each entity is Suite 2 Level 8, 412 St Kilda Road, MELBOURNE VIC 3004.

healthy future', **ofi** can source, grow and manufacture ingredients that are good for farmers' livelihoods, for consumers' health and well-being and for the world around us.

ofi's local and global teams work closely with suppliers, customers, civil society organizations, governments, communities and individual farmers to assess and understand the risks of modern slavery and human trafficking within its operations and supply chains. Given **ofi's** global footprint and the diversity and fragmentation of agricultural value chains, it depends on millions of farmers, many of them smallholders operating in impoverished communities with limited access to education and training. Recognizing these vulnerabilities, **ofi** is committed to identifying, addressing and mitigating the risks of modern slavery across its value chains. Through human rights risk assessments completed across many supply chains, the Group has developed strong visibility of the modern slavery risks within them. **ofi's** global sustainability strategy, Choices for Change (launched in 2024) strengthened the Group's supply chain approach by deploying teams in major growing regions and investing in digital tools for traceability. However, achieving full coverage across 100% of the Group's supply chains remains a challenge due to the scale and complexity of its extensive farmer network, with approximately half of ingredients sourced from indirect suppliers.

Australian operations

ofi Australia has an established business growing, processing and trading almonds for both local and international consumption. **ofi** Australia operates almond orchard properties, processing plant and the trading of edible nut products. **ofi** Australia sells locally within Australia and exports to major almond consuming regions. It also operates a processing, packing and warehouse facility at West Melbourne in Victoria. Along with **ofi** Australia's products, this facility is used to source and process various other nut types. **ofi** Australia has a global supply chain, encompassing both local and international suppliers as part of its direct and indirect procurement activities. Categories of suppliers include the following: raw materials (nut products sourced from growers across various countries and processed at **ofi** Australia facilities), logistics (e.g. freight, storage and handling, stevedoring and port terminal services, shipping), seasonal labor, packing products and site and plant related suppliers. **ofi** Australia has two trading or brand names: Olam Orchards and Olam Edible Nuts. **ofi** Australia holds 100% of the share capital of Olam Almonds. Olam Almonds has no direct subsidiaries and no trading or brand names. **ofi** Australia consulted Olam Almonds in the development of this Statement.

Governance

ofi's approach to modern slavery and human trafficking is underpinned by a clear governance structure that provides oversight, accountability and effective decision-making across the Group. The **ofi** Board of Directors ("Board") is responsible for approving this Statement and is supported by a number of Board committees, specifically the Sustainability and Governance Committee and the Audit and Risk Committee in this regard.

At the management level, responsibility for day-to-day oversight sits with the Chief Sustainability Officer, who is supported by the central Sustainability leadership team including the social impact team. The team has dedicated human rights expertise and is responsible for embedding human rights due diligence and social impact projects in collaboration with colleagues in product platforms.

ofi's Sustainability and HR functions ensure employees understand their role in respecting human rights, implementing measures, communicating requirements to suppliers and monitoring outcomes.

Risks Identification and Monitoring

ofi has put in place a Human Rights Due Diligence Process to monitor and address modern slavery and human trafficking grounded in the UN Guiding Principles on Business and Human Rights, which call on companies to identify, prevent, mitigate and account for human rights impacts across their operations and supply chains. In line with these principles, ofi's Human Rights Due Diligence Process employs a structured and systematic risk identification and monitoring process to assess potential modern slavery risks. The Group considers factors such as geography, industry, labor conditions and supplier relationships and engages with stakeholders, utilizing third-party data and collaborating with experts to identify high-risk areas. This process is underpinned by leveraging ofi's extensive presence throughout the supply chain and direct engagement with farmers and local communities in key sourcing regions. This presence means ofi is well positioned to proactively identify and monitor modern slavery risks.

- **Risk Mapping:** Through a partnership with [Wageningen University Research](#) ("WUR"), ofi has developed country-product specific risk scores for eight human rights principles: forced labor, child labor, violence and harassment, discrimination, unfair remuneration, occupational health and safety, freedom of association and the right to collective bargaining. WUR risk scores use desk-based risk mapping and in 2024 the scoring methodology was improved to reflect risks more accurately on the ground. This process has allowed ofi to determine country-product risk scores that provide an overall understanding of risk exposure across sourcing countries. This enables ofi to prioritize in-depth assessments, targeted mitigation actions and enhanced monitoring where needed.
- **External Assessments:** The Olam Group was one of the first agri-businesses to be affiliated with the Fair Labor Association ("FLA"). ofi has continued this affiliation, drawing on their expertise for the appraisal of its cocoa supply chains and its hazelnut supply chain in Turkey. As an affiliate member of the FLA and to facilitate advancement to becoming an accredited member, the FLA assess ofi's Human Rights Due Diligence Process and systems against accreditation requirements. This includes a review of the Group's policies, strategies and targets as well as field assessments. For new supply chains the FLA conducts baseline assessments in the first year and performs independent external monitoring and independent external verifications to assess ofi's monitoring and remediation systems and identify any non-compliance with FLA's code of conduct which aligns with international labor standards. FLA provides advice on ways to improve ofi's approaches to human rights due diligence and reviews the Group's corrective action plans to strengthen its systems and responses.
- **Identification and Monitoring systems:** Based on the WUR risk scores, ofi is able to identify specific sourcing origins with a high risk of child and forced labor. To further identify and remediate child and forced labor risk in such regions, ofi teams implement additional systems:
 - ofi's Child Labor Monitoring and Remediation System ("CLMRS"), which was developed using recommendations from the FLA continued to be further rolled out in 2025. To date, CLMRS has been fully implemented in all nine of the Group's direct cocoa sourcing origins, nine coffee origins and six nut origins. The system was also put in place in six additional coffee origins which will become fully implemented in 2026.

- **ofi** also continued to roll out a Forced Labor Monitoring and Remediation System ("FLMRS"). Whilst the system was not mandatory in 2025, it will become a requirement in 2026 for all high-risk origins.
- **Whistleblowing and Grievances:** Suspicion or concern of serious wrongdoing is reported through **ofi**'s global mechanism 'Speak Out', which is operated by an external, independent, third-party. 'Speak Out' allows internal and external stakeholders to raise any suspected wrongdoing, including human rights issues to **ofi**. Additionally in 2025, **ofi**'s new global complaints mechanism 'Hello ofi' was launched for external and supply chain stakeholders. This enables any stakeholder in **ofi**'s supply chains to raise issues directly to **ofi** for investigation and resolution.

The 'Speak Out' reporting platform is available here: [SpeakOut Reporting Platform](#)

The 'Hello ofi' reporting platform is available here: [EthicsPoint - Hello ofi](#)

Continuous Improvement: In 2025 the Group started the roll out of a Forced Labor Digital Survey ("FL Survey"), to improve forced labor identification, with teams in certain high-risk origins receiving training on its use. The FL Survey consists of 47 questions covering working conditions, relationships with employers and instances of workplace coercion or threats. Surveys are conducted with farmworkers through **ofi**'s Farmer Information System ("OFIS") and reviewed by the human rights team to flag instances of forced labor.

In addition, from 2026 onwards **ofi** plans to further enhance the risk assessment methodology, building upon the WUR desk-based research methodology through working with an external organisation to undertake ground-truthing assessments in certain supply chains. This approach will involve remote stakeholder consultations, field visits, or a combination of both, to verify the accuracy of the WUR risk mapping.

Risk Mitigation Actions

ofi is committed to safeguarding human and children's rights. The below programs and initiatives were implemented or continued during 2025 to help prevent modern slavery risks:

Supplier Standards and Verification

ofi requires all suppliers to sign the Agri Supplier Code ("ASC") which outlines **ofi**'s requirements for social and environmental practices in supply chains, covering all human rights risks including child labor, forced labor, fair working conditions and respect and non-discrimination. The ASC is available in 17 languages to facilitate better communication and engagement with suppliers. It is aligned with international standards. **ofi** origin teams train suppliers on the ASC on a regular basis.

In 2025, **ofi** teams further expanded on efforts to assess compliance with the ASC through the ASC verification process. To support suppliers to close gaps in compliance, each origin has established an action plan to improve overall compliance in origin with the ASC.

Initiatives to Address Modern Slavery Risk

- **ofi** supported farmer livelihoods by providing training, agricultural inputs, credit and infrastructure to over 573,000 farmers within its global sourcing network. This includes supporting 132,000 women and 23,000 youths. Supporting farmers to earn additional income reduces their need to resort to exploitative labor practices that could amount to forced labor.

- **ofi** supported more than 21,000 women to date with access to finance in cocoa, coffee and nuts supply chains, through extending membership to Village Savings and Loans Associations ("VSLA"). An independent evaluation by the FLA reported a positive impact on women's involvement in decision-making in the community and the household. It highlighted that VSLAs have improved its members' household income and saving habits which contributed to food and health expenses and supporting children's education. This was also reflected in the higher school enrolment rate of their children compared to non-VSLA members. Improved access to education and increased school enrolments can reduce the risk of child labor.
- To address the root cause of child labor, **ofi** works to extend access to education through a variety of activities such as the provision of birth certificates to facilitate school enrolment, supporting the building and repair of existing schools and classrooms, provision of educational learning materials and supporting the establishment of safe spaces and learning centres for children.
- **ofi** continued to participate in several multi-stakeholder initiatives to address human rights challenges collectively and mitigate the risk of forced labor from occurring, including: the International Cocoa Initiative, the Child Learning and Education Facility (CLEF), the International Labor Platform (ILO), Child Labor Platform (CLP), the World Business Council for Sustainable Development (WBCSD), the IDH Living Income Roadmap, the Living Income Community of Practice and act as a Global Living Wage Corporate sponsor. **ofi** also runs multiple projects globally with donors such as the Dutch Fund Against Child Labor (FBK) to mitigate risks to children in its supply chains. Collectively these initiatives seek to address the systemic drivers of modern slavery such as low education, lack of community awareness, poverty and income insecurity.
- **ofi's** sustainability sourcing solution, [AtSource](#), provides traceability to a product's origin and transparency on key supply chain sustainability challenges through data and insights. It enables customers to map their unique sustainability journey, monitor performance and partner to create impact through targeted interventions. AtSource covers social metrics aligned with the Global Reporting Initiative (GRI) and the UN Sustainable Development Goals, including labor related metrics covering human rights, safe and decent work and diversity and inclusion. AtSource continues to expand its reach across **ofi's** extensive supply chain, with more farmers joining the system each year. This growing participation reinforces the integrity of AtSource, where all supplied volumes are verified through rigorous, randomized and unannounced third-party audits.

Actions to mitigate against identified cases

ofi has a robust policy framework to address and remediate instances of modern slavery in its own operations and supply chains, if identified.

When cases are received through 'Hello ofi' or 'Speak Out', these are internally directed to relevant departments and teams for investigation and resolution, with high level oversight of case management maintained throughout the process. Should any cases of modern slavery be reported to **ofi**, the Group will investigate and commits to support the victims where possible in co-operation with other stakeholders as appropriate. **ofi** remediates cases through a range of actions which target root causes.



ofi is committed to reporting on its activities to prevent and remediate human rights risks in the Olam Group Annual Report, ingredient-specific annual **ofi** progress reports such as [Cocoa Compass](#), [Coffee LENS](#), [Spice Maps](#) and the [Nut Trail](#) reports and Olam's Supplementary Sustainability Disclosures (SSD) report. It also reports to publicly available FLA assessments of its cocoa and hazelnut supply chains and to national and multi-stakeholder initiatives such as the Cocoa Forests initiative and the International Cocoa Initiative. In addition, **ofi** reports against other industry reporting standards such as BeSlaveryFree's Chocolate Scorecard for its cocoa supply chains.

Monitoring Effectiveness

ofi monitors the implementation and effectiveness of its sustainability initiatives including interventions to address modern slavery risks in its operations and supply chains and reports accordingly across several publicly available documents listed above. In 2025, **ofi** improved the monitoring and evaluation of modern slavery risks in supply chains, primarily through increasing the number of supply chains with digital tools and systems to identify, track and effectively monitor resolution of modern slavery risks, in particular OFIS.

ofi relies upon a range of internal and external stakeholders to ensure effective monitoring and evaluation. Internal stakeholders include the social impact team who design and develop the processes for child labor and forced labor monitoring on OFIS, country and global teams who are involved in resolution of cases and global digital teams who design the tools to implement the processes. External stakeholders, including farmers and communities are routinely consulted and involved in the monitoring of cases. The FLA performs field assessments to provide independent verification for modern slavery risks and monitor action plans. In some supply chains, project partnerships with NGOs such as Save the Children, ChildFund, Verite and Funcafe are implemented to ensure effective monitoring of child labor and forced labor risks. The ASC verification process provides a measurable indicator of the effectiveness of supplier engagement with the code, assessing the extent to which ASC requirements are understood, adopted and acted upon.

Addressing child labor and detecting modern slavery across supply chains are complex problems and a shared responsibility. It will take time for the Group's monitoring and remediation actions and processes to have the desired effect and drive real, systemic change. The effects of CLMRS and FLMRS are having positive outcomes and **ofi** will continue to monitor this progress over the coming years.

As at 31 December 2025, 92% of child labor cases identified during the year had been remediated or were in the process of remediation. The majority of these cases relate to children working on family smallholder farms, which are normally remedied by facilitating access to schooling. In 2025 **ofi** provided education support to over 48,000 children.

The Group's latest sustainability strategy [Choices for Change](#) established ambitious 2030 targets aimed at fostering prosperous farmers and thriving communities, thereby contributing to the prevention of modern slavery across its supply chains. These targets, which apply across the entire organization are informed by the data and insights available from each of **ofi**'s product platforms. They are developed through collaboration with field experts and formally approved by **ofi**'s Board following recommendation from the Sustainability and Governance Committee. Progress toward these commitments is monitored and tracked by the Sustainability and Governance Committee and Sustainability Leadership Team. Further information on **ofi**'s targets can be found [here](#).

Policies

The Group's policies relating to modern slavery and human trafficking are informed by the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the Women's Empowerment Principles.

- **Code of Conduct:** **ofi's** Code of Conduct sets out the principles by which the Group conducts business, engages with stakeholders and prohibits child labor and any form of forced labor. All **ofi** employees are expected to commit to and uphold the standards set out in the Code of Conduct and can report breaches or raise serious concerns to their respective manager, country leadership team, Human Resources, Legal or through the 'Speak Out' platform.
- **Supplier principles and ASC:** The **ofi** Supplier Principles and ASC stipulate the human rights standards the Group expects suppliers and business partners to uphold. **ofi** employees engage and train suppliers on the topics covered in the ASC, including forced labor and the requirement that suppliers establish a process to receive, review and investigate. Where supplier non-compliance with the ASC is identified, **ofi** has established guidance to help origin teams determine when to engage suppliers to implement corrective action plans and when immediate exclusion is required. In cases where a supplier is consistently found to be non-compliant and does not demonstrate adequate effort to improve compliance, **ofi** reserves the right to suspend procurement of products from such supplier.

ofi undertakes a review of policies annually. Where necessary, updates to policies are made to reflect the changing landscape, with input from in-house experts and external stakeholders. In 2025 updates were made to **ofi's**, Code of Conduct and Human Rights Position Statement.

The list of the Group's most relevant policies, statements and codes is available at Appendix 1.

Training

Training is provided to internal stakeholders to support the Group's response to modern slavery. Training was developed by the Global Human Rights Manager along with training development partner LRN Corporation. The trainings are digitally hosted on the LRN platform and are available in 10 languages. External training is also provided in some origins like Nigeria, where training is made accessible to co-op leaders in the cocoa supply chain.

All **ofi** personnel, manager grade and above, must complete mandatory training on human rights, including modern slavery topics. In 2025, 99% of enrolled personnel completed the training. The training covers the following learnings:

- All relevant **ofi** policies, clarifying **ofi's** position on various human rights standards.
- Introduction to the key human rights topics that are material to **ofi's** supply chains - child labor, forced labor, discrimination, working conditions (wages, working hours and health and safety).
- Managerial responsibilities in ensuring human rights are respected within **ofi's** operations and supply chains.
- Key processes that managers are required to implement in **ofi's** supply chains.

In addition, **ofi** rolled out a basic ASC training to all sustainability and procurement staff globally in July 2025. The training covers all business, human rights and environmental standards in the ASC as well as how teams must ensure supplier compliance.

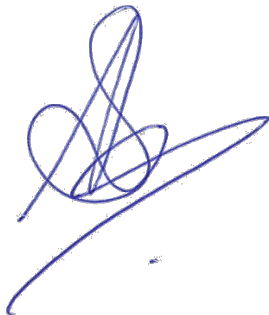
Targeted training on forced labor was also developed for global cocoa origin teams, with a focus on case identification and remediation. The program followed a Training of Trainers model, with sustainability managers completing an online module and receiving standardized guidance and materials to train field teams. The training content was developed by Verité with input from **ofi**'s Global Human Rights and Inclusion Manager.

ofi's Commitment and the Year Ahead

ofi is committed to continue working with stakeholders from the public and private sectors to tackle discrimination, eliminate unsafe and illegal labor practices for children and adults, promote fairness and equality and champion inclusion and diversity, while continuing to improve the livelihoods of farmers and communities.

To access previous versions of **ofi**'s Modern Slavery and Human Trafficking Statement, please click [here](#).

This Statement was approved by the Board of Directors of **OFI Group Limited** on behalf of the Reporting Entities on 5 May 2026.



Shekhar Anantharaman

Executive Director and Group CEO

5 May 2026

OFI Group Limited

Appendix 1 – Relevant Policies, Statements and Codes

Name	Date published/ Last updated
ofi Whistleblowing Policy	June 2024
ofi Fair Employment Policy	September 2023
Code of Conduct	October 2025
ofi Agri Supplier Code	April 2024
ofi Supplier Principles 2025	February 2024
Human Rights Position Statement	March 2025