

# Modern Slavery Statement

## Statement of compliance for the year to 31 December 2024

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 ("**the Act**") and is published by Camellia Plc ("**Camellia**"). It sets out the steps Camellia has taken to prevent slavery, human trafficking and forced labour in its own supply chains as well as Camellia's expectations of, and steps being taken by, the operating companies in which it is invested.

### Overview of our business and our policy

Camellia is the ultimate holding company of a diverse group of companies ("**the Group**"). Within the Group, Camellia has indirect interests in several entities which have responsibility for managing primarily agricultural operations, including responsibility for managing the assets and employees associated with those operations ("**the Operating Companies**"), as well as other investments. The Operating Companies are based in Bangladesh, Brazil, India, Kenya, Malawi, South Africa, Tanzania and the UK. The majority of the Group's turnover is derived from the work carried out by the Operating Companies in the agricultural sector through the growing of tea, avocado, macadamia, rubber, wine grapes, blueberries, arable crops, forestry and livestock farming.

Consistent with the Group's long-standing commitment to maintaining high legal and ethical standards, slavery, human trafficking and forced labour in any form are prohibited in the business and operations of all Operating Companies.

### Governance and strategy

Camellia's business philosophy is based on an approach which provides the Operating Companies with a high degree of operational autonomy. This is founded on a belief that the management teams of the individual Operating Companies have better local insight and expertise which positions them to make the best decisions with respect to operational matters, employees, local communities and the environment. So that Camellia can have confidence that this operational autonomy is being exercised consistent with its expectations of legal and ethical compliance, those expectations are set out within the 'Group Principal Policies' which detail the principles that Camellia expects the Operating Companies to themselves adopt and adhere to in key areas such as human rights, anti-bribery and corruption, environmental, certification and traceability, employee welfare, health and safety and whistleblowing.

From a modern slavery and human rights perspective, those expectations have been set by the Camellia Board, with the support of its Sustainability and Safeguarding Committee, having regard to overall sustainability strategy. That strategy consists of five guiding pillars, which include social sustainability and safeguarding. Please refer to our "Sustainability" webpage for more detail.

Responsibility for achieving legal and ethical compliance in accordance with those Group Principal Policies (as well as local laws and regulations) lies with the leadership of the respective Operating Companies, who are responsible for developing local policies and procedures that support the welfare

of the communities and the environments in which they operate (including in relation to slavery, human trafficking and forced labour) and that create safe working environments in which all employees and other stakeholders are treated fairly and with respect.

Ultimately, those individual Operating Companies have the local expertise and understanding which means they are best placed to identify relevant needs and apply the processes and practices that allow them to operate legally, responsibly and ethically over the long term and to embed the expectations set out in the Group Principal Policies into their own culture, strategy and daily practices. For the same reason, the Operating Companies are also best placed to ensure that the policies and practices they put in place are implemented and complied with. This promotes the continuity, development and progressive growth of those individual enterprises in an ethical and responsible way, that is relevant to, and supportive of, their own local jurisdictions and cultures.

For further information on the Group Principal Policies, please refer to our website.

### **Operations and supply chain risks**

It is recognised that modern slavery exists in many different forms and can be difficult to detect, particularly in complex international supply chains. Camellia itself is a UK office-based business with limited direct supply chains. Those supply chains are predominantly in the UK, and generally low risk in nature. The goods and services Camellia purchases to deliver its services primarily relate to information technology, professional services, travel, catering, property, facility management, maintenance and other materials as required.

The Operating Companies have more involved risks within both their own direct operations and their local supply chains. Although a number of our Operating Companies' employees are permanent, as is common in the agricultural sector, it is often necessary to employ seasonal employees to harvest, process and transport crops at peak times. Notwithstanding that the Operating Companies seek to pay wages, benefits and allowances in accordance with local legislation and trade union agreements, generally speaking the nature of a seasonal workforce has the ability to give rise to various heightened risks. We therefore expect that additional controls and mitigations are adopted by those Operating Companies where appropriate, locally. We note that many of the Operating Companies have received and maintain certifications with challenging ethical standards from, inter alia, SMETA-ETI, ETP, Fairtrade, Trustea and Rainforest Alliance, which reflect these Operating Companies' commitment to high standards in this area. The certifications require detailed audits of employment practices in the Operating Companies and of key suppliers.

The majority of the tier one suppliers for the agricultural Operating Companies are smallholder farmers. The Operating Companies purchase products from these growers at a market-related price which they then process, pack and sell via their own channels to market. Many of the Operating Companies have established extension service programs to support local smallholder farmers, assisting them with their farms and crops and helping to build closer relationships. Most Operating Companies have a continuous process of engagement with their considerable number of tier 1 suppliers to understand supply chain risks. Identifying these risks and establishing practical mitigation measures is an evolving process which requires both short and long-term strategies.

The Operating Companies are responsible for implementing their own due diligence and onboarding measures in relation to their suppliers. These include conducting supply chain due diligence on their major tier one and two suppliers, where feasible, and including enhanced contractual protections as necessary in relation to modern slavery and human trafficking matters.

### **Supply chain standards**

Whilst neither Camellia nor the Operating Companies can guarantee that all tiers within their respective supply chains are completely free of slavery, human trafficking or forced labour, as customers, Camellia expects the Operating Companies to play an active role in communicating their expectations to chart a journey of continuous improvement.

In that context, the Operating Companies continue their efforts to grow and nurture their businesses, including developing relationships with their suppliers and the wider communities in which they operate, in a sustainable way with respect for human rights as defined by the UN Guiding Principles on Business and Human Rights. For example, certain Operating Companies have in place specific policies and procedures for suppliers relating to ethical purchasing designed to mitigate risks to people.

### **Training**

Camellia has undertaken and continues training of its directors and relevant employees in relation to modern slavery. Likewise, where relevant, the Operating Companies have undertaken and continue training of their relevant employees and, where appropriate, suppliers to raise awareness of modern slavery issues and assist in identifying risks in their given businesses and supply chains.

### **Monitoring and reporting of concerns**

The Camellia Board, together with and supported by the Group General Counsel and the Sustainability and Safeguarding Committee, will:

1. continue to oversee the implementation and monitoring of Camellia's compliance with the Act in respect of its own operations and supply chains; and
2. in accordance with the governance approach described above, keep under review the alignment of the Operating Companies with the Group Principal Policies.

The leadership of the individual Operating Companies is responsible for ensuring compliance with legal and ethical requirements relating to slavery, human trafficking and forced labour in their business and jurisdictions consistent with the Group Principal Policies, including having appropriate remediation and redress mechanisms.

We also expect that any modern slavery issues identified by employees, officers, consultants, contractors, volunteers, interns, casual workers, agency workers and the general public can, and should be, immediately reported to the appropriate point of contact in the relevant Operational Entity in line with the Whistleblowing Group Principal Policy as implemented and operationalised locally.

### **Next steps**

- This MSA statement will be posted on the UK Government's Modern Slavery registry. Camellia has also registered its nominated contact on such registry.
- Further training of Camellia's key personnel.
- Operating Companies to consider any next steps required in relation to their specific operations, including undertaking further supply chain due diligence and related mitigating measures in respect of key tier one and two suppliers. In addition, agricultural Operating Companies to promote further training of the smallholders and outgrowers.

### **Board approval**

This statement was approved by the Board of Camellia Plc on 24 April 2025

Next Review: January 2026



Name: Simon Turner

Title: Chairman

Date: 24 April 2025