ECOM

Modern Slavery and Due Diligence Statement

ECOM 2025

Modern Slavery and Due Diligence Statement

for the financial year ending 31 December 2025

Modern slavery is a crime and a violation of fundamental rights and freedoms. It takes many forms, including child labour, human trafficking, forced labour and servitude, and is estimated to affect around 50 million people globally.[1]

ECOM Agroindustrial Corp. Ltd and its group companies (**"ECOM"** or **"ECOM Group"**) take modern slavery risks seriously and are committed to continuous improvement in identifying, preventing, and addressing modern slavery across our operations and supply chains.

ECOM's Modern Slavery and Due Diligence Statement (the **"Statement"**) provides an overview of our business and supply chains in the context of modern slavery prevention and due diligence relating to child labour, and sets out our approach and the actions taken in an effort to combat modern slavery. It has been prepared with input from relevant internal stakeholders and subject-matter experts across the ECOM Group.

This Statement is made pursuant to: Articles 964a–964l of the Swiss Code of Obligations, as implemented by the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour; the UK Modern Slavery Act 2015; the Australian Modern Slavery Act 2018; and the California Transparency in Supply Chains Act of 2010, and is our tenth such statement.

This Statement applies to all the subsidiary organisations of ECOM Agroindustrial Corp. Ltd. This joint statement is issued on behalf of: ECOM Agroindustrial Corp. Ltd (for Switzerland), ECOM Agrotrade Ltd (for the United Kingdom), ECOM Commodities Pty. Limited (for Australia), and ECOM USA, LLC; Atlantic (USA), LLC; Atlantic Cocoa Company, Inc.; and Atlantic Specialty Coffee, Inc. (for California, US) for the financial year ending 31 December 2025 (approved in 2026). Unless expressly stated otherwise, references to 'we,' 'us,' and 'our' refer to the ECOM Group as a whole.

1. OUR ORGANISATION, BUSINESS, AND SUPPLY CHAINS

Who we are. ECOM is a world-leading soft commodity services group specialising in coffee, cocoa and cotton, with ancillary activities in nuts and ingredients. We are headquartered in Switzerland, operate in 40+ countries, and employ 6,000+ permanent employees worldwide.

How we operate. As an origin-integrated company, a large part of ECOM's supply chains is traceable, sustainable, and client- and partner-specific. Our commodities are procured both directly from producers and producer organisations, or indirectly through larger suppliers. We also provide primary processing, logistics and risk management services, and sell to branded product manufacturers.

Core businesses.

Coffee: ECOM is among the world's largest coffee traders and the leading coffee dry and wet miller, sourcing through our origin operations in 20+ countries and more widely from 40+ countries.

Cocoa: We are one of the largest cocoa traders and processors, sourcing through our origin operations in 10 countries and more widely from 30+ countries. We sell beans directly to our clients or process them into cocoa mass, butter, cake and powder in our six factories on three continents.

Cotton: ECOM operates across 13 origin countries and 36 sales destinations, handling approximately 2.5 million bales of raw cotton annually, with a local presence in almost all major cotton-producing markets and distribution to key importing destinations.

Nuts & Ingredients: ECOM supplies nut and seed ingredients to food and feed customers across North America, Europe and Asia. We source these products from Africa, Latin America, Asia and North America.

[1] International Labour Organization, Walk Free Foundation and the International Organization for Migration. Global Estimates on Modern Slavery 2022.

Value chain roles. ECOM's operations are organised across multiple steps in the value chain. We interact with many stakeholders across the globe, working closely with producers to improve farming practices and livelihoods, and with clients and suppliers to strengthen due diligence and transparency.

Coffee

Coffee is predominantly cultivated by smallholder farmers, who typically sell their cherries or parchment to local aggregators. These entities collect coffee from remote areas and carry out, or coordinate, primary processing at wet and dry mills. Wet mills – often operated by cooperatives or by ECOM – process coffee cherries into parchment or green beans suitable for export.

In some countries, most notably Brazil, farms are often larger, allowing them to process cherries into green beans and manage exports directly.

Cooperatives support farmers across many origins by organising production, improving access to markets, and facilitating collective bargaining.

Exporters, including ECOM's origin operations, purchase green coffee from aggregators, cooperatives, or farms, and sell it either directly to customers or through ECOM's destination offices. Depending on the origin and operating context, ECOM may act as a local aggregator, post-harvest processor, or exporter within the coffee supply chain. In addition, ECOM operates as a global trader, buying and selling green coffee with third parties outside its origin operations, while promoting responsible supply chain practices.

Through these roles, ECOM supplies tailor-made quality coffee to roasters and brands worldwide.

Cocoa

Cocoa is largely produced by smallholder farmers who sell to local aggregators and exporters, as the domestic market is limited. Exporters then sell to global traders for processing into cocoa liquor, powder and butter, after which manufacturers and retailers bring products to consumers.

In our origin-integrated supply chains, we act as both local aggregators and exporters, connecting farmers to global markets. Our teams support producers with better agricultural practices, climate resilience, and community initiatives on issues like gender equality and child labour.

We also process cocoa into butter, liquor and powder at six facilities, where we continue to improve efficiency and reduce environmental impact.

As a global trader, we buy and sell cocoa beans and products from third parties outside our origin network, working together with our suppliers to strengthen their supply chain due diligence. Our Supply Chain Due Diligence policy outlines how we engage with these third party suppliers.

Cotton

ECOM generally purchases cotton already processed and packed in bales. Our suppliers may include individual farmers, ginners acting as aggregators, cooperatives, local exporters or, in some markets, state-run entities.

Once purchased, ECOM markets the cotton primarily to destination countries in Asia and the Indian Subcontinent. Throughout the procurement and logistics process, we leverage our assets to aggregate specific quantities or qualities, safeguard consistency, and ensure full traceability from farm to mill.

Our customers are generally textile mills, which process the fibre into yarn. Many of these mills are vertically integrated and continue production downstream, including fabric manufacturing, dyeing, finishing, cutting and, in some cases, the final garment stage.

Nuts and Ingredients

In our conventional and large organic supply chains, we function as a global trader trading conventional nuts and ingredients from third parties and cultivating committed trade relationships with large organic suppliers. In most cases ECOM is the exporter, occasionally providing warehousing and logistics services at destination.

We play a more active role in our smallholder organic supply chains. We support cooperatives to produce certified organic commodities; aggregate organic produce from partner cooperatives; process at our facilities; and export to global markets.

2. GOVERNANCE AND ACCOUNTABILITY

Board oversight. Overall responsibility for the Environmental, Social, and Governance ("**ESG**") strategy and alignment with ECOM's objectives rests with the *Conseil d'Administration* (Board of Directors). The Board delegates day-to-day management to the CEO. The Executive Committee reports to the CEO and serves as a collective decision-making forum for the members.

A cross-functional ESG Committee, comprising members of the Executive Committee and representatives from Legal, HR, Sustainability, and other relevant functions, oversees the integration of human rights policies, procedures and actions across the ECOM Group. The Committee meets at least quarterly and provides advice and recommendations to both the Executive Committee and the Audit Committee of the Board.

Values and culture. In 2024, we launched ECOM Values - *Innovation, Inclusivity, Excellence, Integrity, Collaboration* - guiding how we do business and how we engage with employees, partners and communities.

Management systems. ECOM's Environmental and Social Management System ("**ESMS**") is the ECOM Group's global framework for assessing and managing environmental, safety and social compliance across owned and operated sites.
It establishes a standardised structure, minimum requirements, and common tools applicable across all operations, while requiring each origin to develop a locally adapted ESMS aligned with its operational context, risk profile, and applicable national legal and regulatory requirements.

The ECOM Group-level ESMS consolidates ECOM's longstanding environmental, social, health and safety, stakeholder engagement, and grievance-related policies. It is supported by standard procedures, risk assessment tools, and monitoring and reporting requirements into a single global framework aligned with International Finance Corporation Performance Standard 1, supported by standard procedures, risk assessment tools, management plans, and monitoring and reporting requirements.

ESMS is regularly updated; the most recent revision in 2025 strengthened areas including risk assessment, supply chain due diligence, occupational health and safety, emergency preparedness, security management, and monitoring.

To ensure effective implementation across diverse operational contexts, ESMS is currently being rolled out through a phased, region by region approach led by the ECOM Group Environmental and Social team. The rollout prioritises the development of locally adapted ESMS at each origin, supported by standardised tools such as legal registers, risk screening and assessment, and management plans, while allowing for proportional, risk-based application in line with local regulatory requirements and operational realities.

3. STANDARDS, COMMITMENTS AND POLICIES

ECOM complies in all instances with applicable laws. Employment is freely chosen: ECOM will not employ forced labour, which is defined as involuntary or compulsory labour, such as indentured labour, bonded labour or similar labour-contracting arrangements. We will inquire about any possibility of its existence within the supply chain and work to eliminate the same.

We comply with local laws regarding minimum employment age and ensure that any young persons engaged (such as trainees or interns) are above the relevant local legal working age. ECOM will not employ children in a manner that is economically exploitative or is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development.

We adhere to the UN Universal Declaration of Human Rights and the International Labour Organisation ("**ILO**") core labour conventions (including Conventions 29 and 105 (Forced Labour), 182 (Worst Forms of Child Labour) and 138 (Minimum Age), and seek alignment with the UN Guiding Principles on Business and Human Rights ("**UNGP**") and the OECD Due Diligence Guidance for Responsible Business Conduct.

Our commitments to international frameworks are reinforced through our participation in global initiatives. In 2025, ECOM submitted its third Communication on Progress to the UN Global Compact initiative ("**UNGC**") - the largest voluntary corporate sustainability initiative in the world. This is an annual disclosure of ECOM's continuous efforts to integrate the ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption (the "**Ten Principles**") into our business strategy, culture, daily operations and contribute to the United Nations goals (in particular, the Sustainable Development Goals). In line with the UNGC requirements, ECOM will continue to report, on an annual basis, its progress on implementing the Ten Principles.

Key policies.
We implement and enforce several effective systems and controls to address the risks of modern slavery in our supply chains, and regularly review and update these to reflect changes in the law, demographics, business requirements, and changing risks. Our internal and external policies and procedures are ultimately overseen by the most senior management level at ECOM and are core to advocating our global values of integrity, respect and ethical conduct in all our internal and business relationships. These policies and procedures have been developed taking account of applicable law and international standards and guidance mentioned in the previous section.

The key policies include:

Internal

The following policies apply to employees, managers, internal operations and ECOM owned facilities. Compliance is reinforced by managers. Human Resources department oversees, reviews and standardises processes across operations. Internal audits check alignment between local and group level practices.

Policy	Description
General HR Policies	Apply to all ECOM employees globally and cover equal opportunities, non-discrimination, fair hiring, working conditions and safety; reinforce ethical, transparent recruitment and uphold Freedom of Association in line with ILO Conventions 87 and 98, including commitment to ensure slavery and child labour are not taking place in any part of our business. Accessible to employees through the ECOM Group's Intranet.
Equality, Diversity & Inclusion Policy	Prohibits discrimination based on age, disability, gender, race, religion, sexual orientation and other protected characteristics. It aims to build a fair, transparent and inclusive culture that values merit and diverse perspectives. Promotes equal opportunities and supports all employees in reaching their potential. Available on the ECOM Group's Intranet and website.
Anti-Discrimination & Harassment Policy	Introduced in 2024 and aligned with key ILO conventions and UN human rights standards. Commits to a workplace free from bullying and harassment, where all individuals are treated with dignity and respect. Available in seven languages. Communicated via email and reinforced through mandatory online training.

ECOM Code of Conduct	Outlines the standards expected from all employees, agents and representatives to ensure responsible, ethical and sustainable business practices. It reaffirms ECOM's commitment to not discriminate in its employment practices, nor use child or forced labour. It is mandatory for all employees and available in six languages; it is regularly shared with all staff. All new employees must sign it to confirm adherence.

External

The following policies apply to suppliers, farmers, cooperatives, partners, and broader supply chain stakeholders.

ESG Compliance team monitors compliance by way of (1) carrying out country level and supplier level risk assessments, (2) supply chain and traceability mapping through TRACT and BanQu and (3) targeted follow-ups and action plans for high risk suppliers.

Policy	Description
Supplier Code of Conduct	Sets expectations for suppliers and contractors to uphold ECOM's ethical, social and environmental standards. It reinforces our commitment to eliminating modern slavery and promoting responsible practices throughout the supply chain. It was updated in 2024 to include Audit, Breach, and Corrective Action sections, as well as stronger human-rights commitments. It is available in five languages. Monitoring compliance includes (1) supplier audits where risks are identified, (2) yearly due diligence questionnaires and (3) follow-up evaluations, corrective action plans and potential responsible disengagement. The Supplier Code of Conduct is integrated into our supplier contracts.
Supply Chain Due Diligence Policy	Published in 2024 to meet Swiss law, the EU sustainability regulations, and expectations of ESG auditors. It complements the Supplier Code of Conduct and expands due diligence requirements to all suppliers. It provides a framework for identifying, preventing and addressing human rights and environmental risks across operations and supply chains. While the policy was initially rolled out as a standalone process, it is now being progressively integrated into ESMS as part of the ECOM Group's phased ESMS rollout. This integration embeds supply chain due diligence within existing ESMS processes, including operations risk screening, assessment, monitoring, and corrective action planning, ensuring a more consistent and operationalised approach across origins.
Social Policy	Reflects ECOM's commitment to strong social standards across all operations and supply chains. The Social Policy addresses topics such as working conditions, child and forced labour, and diversity and inclusion. Prevention and mitigation of child and forced labour are also integrated in our other policies, such as Supplier Code of Conduct and Supply Chain Due Diligence policy to reinforce the commitment and communicate more widely.
Environmental Policy	Reflects ECOM's commitment to preventing and mitigating environmental risks in our operations and supply chains. It reinforces commitments in key areas including climate change mitigation, responsible chemical use, wastewater and resource management, biodiversity protection, and the prevention and detection of deforestation and forest degradation.

Internal and External

Policy	Description
Speak Up Policy	Establishes mechanism for raising and investigating concerns in relation to ethics and compliance practices within ECOM Group. We encourage early reporting of suspected wrongdoing and having a robust policy and effective systems ensures a safe, transparent reporting culture. The policy is available in two versions (internal and external), which are available in six languages and aligned with the EU Whistleblower Directive. See also *Grievance mechanisms* below.

4. SALIENT RISKS AND DUE DILIGENCE

Risk profile. ECOM operates globally across high-risk geographies and within complex agricultural supply chains, many of which rely on smallholder farmers, seasonal labour and multiple intermediaries. These structural characteristics create inherent risks related to child labour and modern slavery.

Geographic and Supply-Chain Exposure

ECOM's direct operations, including origin-based aggregators, mills and processing facilities, carry a higher level of visibility and control, but also operate in high-risk geographies with structural vulnerabilities such as rural poverty, weak labour enforcement and informal labour markets.

Tier-1 suppliers include cooperatives, small and large aggregators, exporters, ginners, processors and other direct commercial partners. Key risks include limited traceability and visibility in supplier-managed purchasing networks; variation in capacity and human-rights maturity across supplier types and regions; and lower due-diligence readiness in some sectors (e.g., cotton, cashew, sesame).

The deepest risk exposure is within indirect, multi-tier, partner-sourced or intermediary-heavy supply chains, where ECOM has less direct leverage, limited oversight, facing additional challenges in monitoring. Key risks include hidden labour practices and undocumented intermediaries; low visibility into subcontracted labour; and high prevalence of structural vulnerabilities, including poverty, lack of education, gender inequality, climate-driven migration, and seasonal labour.

Supply-Chain Complexity and Third-Party Risks

ECOM sources both directly from farmers and indirectly through large suppliers, operating across both origin-sourced and partner-sourced supply chains. This creates variable levels of visibility across commodities and origins.

As a result, ECOM faces risks related to:
- Monitoring compliance across thousands of suppliers.
- Detecting abuses in informal or intermediary-heavy chains.
- Variation in suppliers' human-rights capacity and systems.

ECOM's supplier self-assessment questionnaire (see *Supplier expectations and enforcement* below) responses indicate that some suppliers (such as smaller aggregators) face challenges in understanding or meeting due-diligence expectations.

Labour-Related Risk Factors

ECOM's operations intersect with several labour-related vulnerabilities:

Child Labour	Cocoa and coffee production in West and East Africa and parts of Latin America present heightened risks of hazardous child labour. ECOM's Child Labour Monitoring and Remediation System's (**"CLMRS"**) data shows thousands of child-labour cases identified annually in our direct cocoa supply chains in Cameroon, Côte d'Ivoire, Ghana and Nigeria, indicating material exposure. Section 5 below sets out how we identify and monitor child labour cases, as well as the remediation process. Within ECOM's own operations, child labour has not been identified as a significant risk. This is partly due to our policy of not employing workers under the age of 18 and ensuring that any young persons engaged (such as trainees or interns) are above the relevant local legal working age.
Forced Labour	Agricultural sectors in high-risk countries can involve debt-bonded labour, migrant labour exploitation, coercive recruitment practices. Temporary and seasonal labour (which ECOM uses) also increases vulnerability.

Social and Economic Drivers of Risk

There are certain systemic issues which deepen modern slavery vulnerabilities regardless of corporate controls. These include rural poverty; low farm profitability; limited alternative employment for youth; restricted access to education and gender inequality.

Environmental & Regulatory Risks

Environmental pressures, including deforestation and climate change, can further strain livelihoods and increase labour-related risks.

Identified High-Risk Areas

Cocoa supply chains, particularly in West Africa, continue to face high risks of child labour and forced labour.

Coffee supply chains face material child-labour risks, alongside heightened vulnerability of migrant workers, especially across parts of Latin America.

Cotton supply chains present risks linked to child labour, forced labour and migrant-worker exploitation, notably in India and in certain regions of Africa.

Nuts and Ingredients supply chains face child-labour risk in Africa and Asia (in particular India and Pakistan).

These contextual factors shape our due-diligence priorities. By assessing risks across geographic origins, we can focus on regions with heightened vulnerability to modern slavery and child labour.

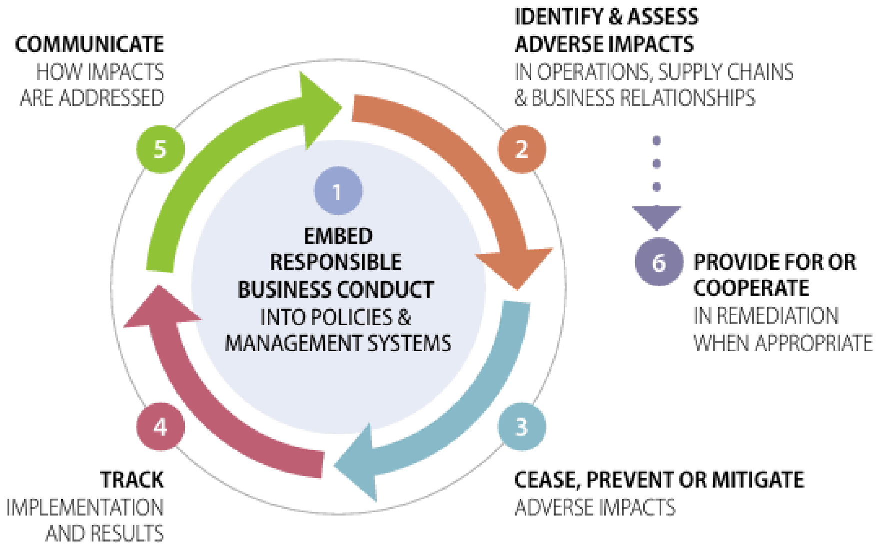
We assess child-labour risk using recognised external indicators, including risk maps and datasets from UNICEF, the ILO and other UN bodies. While these indicators provide essential context, they are not a substitute for organisation-specific assessments. Our long-term aim is to integrate more prevalence and incidence data directly from our supply chains to enable increasingly targeted interventions. We also work with external partners who have the expertise to support mitigation in high-risk communities.

Risk assessments across our origin-sourced supply chains inform when and how we intervene locally, including through community-level assessments, monitoring and remediation systems, and preventative initiatives focused on child wellbeing. We also engage with local stakeholders to understand the effectiveness of these actions.

In partner-sourced supply chains, risk assessments guide the expansion of our due-diligence protocols, including supplier risk screening and supporting partners to strengthen their own policies, practices and grievance mechanisms.

Due diligence framework. Our approach to due diligence follows the OECD Due Diligence Guidance for Responsible Business Conduct[2], which sets out a six step, risk-based framework for responsible business conduct. In line with this guidance, we: (1) embed responsible business conduct into our policies and management systems; (2) identify and assess actual and potential adverse impacts across our operations and supply chains; (3) cease, prevent and mitigate adverse impacts; (4) track the effectiveness of our actions; (5) communicate how impacts are addressed; and (6) provide for or cooperate in remediation where appropriate (see *Figure 1*). This structured approach helps ensure that due diligence is ongoing, systematic, and focused on the most severe risks to people and the environment.

FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES



Source: OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct.

[2] OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct, OECD Publishing, Paris, https://doi.org/10.1787/15f5f4b3-en.

We continuously monitor our own operations in line with the internal policies and including by carrying out internal audits to identify and address any potential cases of child or forced labour.

We conduct risk assessments, both at country and supplier level, to help us understand where our action would have the largest positive impact. As an origin-integrated company, we seek to listen to our stakeholders and ensure that the due diligence process is guided by local experiences. We work with our clients and suppliers throughout our global supply chains to address the risks of child labour, forced labour and any kind of modern slavery.

We assess the risks throughout our origin-sourced and partner-sourced supply chains. We follow up with high-risk suppliers, putting in place action plans and terminate the relationship by way of responsible disengagement where necessary.

Supplier expectations and enforcement. A fundamental part of our due diligence efforts is to better understand our suppliers and their sustainability practices, which we do through mapping of our supply chains. We continue to work towards achieving greater visibility of all our activities with digital traceability systems.

In summary, in 2025 we:

- Continued conducting country level risk assessments across coffee, cocoa and cotton origins, screening human and labour rights, health and safety, environmental degradation/deforestation and assessing our leverage.
- Advanced supplier level due diligence for through supplier self-assessments, sending tailored questionnaires to suppliers. We had a 50% response rate for coffee and cocoa suppliers; around a quarter of suppliers were selected for follow up reviews; more than half of these follow ups have now been concluded. In cotton, the response rate was below 50% in several origins, particularly where suppliers were smaller aggregators or intermediaries. For cashew, sesame and soy, this marked the first year in which suppliers were requested to complete the self-assessment.
- Continued to expand digital traceability systems to improve visibility and readiness for the EU Deforestation Regulation (**"EUDR"**), and emerging due diligence obligations.

Self-Assessment Supplier Questionnaire

ECOM conducts an annual self-assessment questionnaire to evaluate suppliers' due diligence and human rights and environmental policies and practices. The questionnaire focuses on key areas of modern-slavery-related risk, including suppliers' readiness for traceability and transparency, and their exposure to forced labour, child labour, deforestation, and health and safety risks. It also covers certifications, environmental permits, labour and wage practices, and assesses suppliers' understanding of and commitment to ECOM's Supplier Code of Conduct.

Throughout the year, ECOM's ESG Compliance team worked systematically to follow up on outstanding responses and strengthen supplier engagement. The team reviewed all submissions to identify any critical red flags requiring further inquiry or action. Where elevated risks are identified, ECOM engages directly with the supplier to understand the issue and determine appropriate mitigation measures. Action plans are established where necessary to ensure that identified risks are addressed.

Engagement levels among coffee and cocoa suppliers have improved significantly, supported by the EUDR's mandatory due-diligence requirements and strengthened communication by trade and purchasing teams regarding the purpose and expectations of the survey and subsequent follow-ups.

In cotton, invitations were targeted at higher-risk origins identified through the 2024 country risk assessment. For cashew, sesame and soy, this marked the first year in which suppliers were requested to complete the self-assessment.

The questionnaire has been refined further for 2026 rollout to include more targeted and relevant questions for different types of suppliers.

Country-Specific Supply Chain Deep Dives

In addition to the supplier follow ups based on the due diligence questionnaire, we conducted supply chain deep dives in two key origin countries: Cote d'Ivoire and Mexico. These supplier deep dives covered coffee, cocoa and cotton supply chains, and suppliers were selected to reflect different categories, including high- and low-leverage relationships, and varying organisational capacities. The objective was to test engagement approaches and gain more detailed insight into risk exposure across supply chains. The supply chain deep dives reinforced our understanding of the risks in the countries and how they can be managed. These insights are being integrated into our due diligence processes.

Supplier Code of Conduct and Enforcement

Suppliers are contractually required to monitor compliance with ECOM's policies referenced in the Supplier Code of Conduct and to ensure that appropriate remediation or corrective action plans are in place where risks or non-compliances are identified. Our Supplier Code of Conduct, incorporated into our supplier contracts, grants us the right to audit suppliers' practices.

Where human rights-related risks are identified, we work with suppliers to implement measures designed to prevent or mitigate those risks from materialising. ECOM's approach to due diligence is collaborative, and we seek to exhaust all reasonable options to support suppliers in addressing identified human rights or environmental risks. Where issues are identified, we work with suppliers to develop timebound corrective action plans aimed at preventing, mitigating or remedying adverse impacts. Disengagement is considered only as a last resort, and only where prevention and mitigation efforts have failed or where a supplier refuses to collaborate, declines to share necessary information, or is found to be in serious breach of the Supplier Code of Conduct. Responsible disengagement is designed to avoid causing undue harm to vulnerable actors within the supply chain.

ECOM has established internal guidelines to support decision-making in disengagement scenarios. These consider:

(i) Whether all reasonable avenues for engagement and remediation have been explored;
(ii) The stakeholders likely to be affected;
(iii) The severity of the adverse impacts; and
(iv) The degree of dependency of the supplier on ECOM.

If a supplier begins to actively and genuinely cooperate during the disengagement process, ECOM may pause or stop the disengagement. Throughout the process, ECOM informs and engages relevant stakeholders to understand potential human rights and environmental impacts that may arise from exiting the relationship.

5. IDENTIFICATION, MONITORING AND REMEDIATION

Identification and Monitoring. In our direct cocoa supply chains in Cameroon, Côte d'Ivoire, Ghana and Nigeria we operate CLMRS, the Child Labour Monitoring and Remediation Systems. In 2025, across our direct and partner supply chains CLMRS enabled monitoring of 145,299 households (up from 88,327 in 2022) and identified 20,964 cases of child labour (up from 2,824 in 2022), including 14,746 in Côte d'Ivoire, 5,068 in Ghana, 1,063 in Nigeria and 87 in Cameroon (approx. 44% of cases girls). The higher number of cases in certain origins highlights the expansion of our systems and the improvement in their ability to detect cases of child labour across our supply chain. 93% of the identified cases have received and/or are receiving remediation or support from ECOM.

Monitoring in coffee supply chains is informed by the Rainforest Alliance assess-and-address approach, a risk-based framework focused on identifying, preventing and remediating child labour and forced labour risks through ongoing assessment, stakeholder engagement and continuous improvement, rather than prohibition alone. Assess-and-address systems are also part of certified cocoa supply chains where full CLMRS have not been implemented or where child labour is less of a material risk.

ECOM does not operate a cotton specific monitoring system equivalent to CLMRS, reflecting the indirect sourcing model. ECOM's risk exposure is reduced due to reliance on certified aggregators and lower sourcing volumes in high-risk regions. More than 90% of total cotton volumes originate from lower-risk regions. In most cotton producing origins where social risk exposure exists (e.g., West Africa, India), ECOM sources through certified aggregators, such as ginners, cooperatives and exporters, rather than directly from farmers. Certification schemes including CmiA, BCI, Organic, GOTS and Regenagri contain their own monitoring, verification and remediation obligations, which suppliers must meet to maintain certification.

Similarly, within the nuts and ingredients supply chain, ECOM primarily sources indirectly rather than directly from farmers. The majority of ECOM's processor partners in this supply chain are certified against recognised social standards, including SMETA, which require the implementation of systems to identify, manage and address labour and human rights risks.

ECOM complements monitoring with community-based prevention to address root causes, including:

- In 2025, our child protection awareness efforts reached 3,386 communities in our origin operations for cocoa supply chains, representing approximately 80% of the origin sourced volume. Additionally, another 767 communities in Ivory Coast were trained through our trusted partner sourced supply chain.
- Multiple initiatives are in place to support social care and the provision of safe spaces for the children of coffee pickers during the harvest period. These are complemented by livelihood programmes for coffee-growing households, aimed at reducing poverty through improved productivity, lower production costs, and diversified sources of income.
- Engagement with community leaders, cooperatives, teachers, and families.
- Labour-saving technologies, youth employment, life-skills, and support to school management committees.
- Women's entrepreneurship and access to microfinance.
- Strengthening due diligence processes for suppliers and partners.

In respect of all commodities, the results of our child labour-related risk assessments inform our due diligence approach and subsequent mitigation actions. We follow up on any indications of child labour, implementing appropriate measures to avert or mitigate negative effects. These include onsite audits, use of trusted data sources and indicators, engagement with third party experts and business partners, awareness raising, training, and use of recognised standards and certification systems. We also evaluate and report on the effectiveness of any mitigation and remediation measures taken.

Independent review and improvement. ECOM has partnered with a Non-Governmental Organisation ("**NGO**") Verité to ensure our CLMRS complied with best practices and relevant standards. In 2024, Verité reviewed our CLMRS (field research in Côte d'Ivoire and Ghana), recognising investments in awareness and data systems and recommending:

- Greater standardisation across programmes and country level strategies;
- Increased resourcing for monitoring and remediation and improved coordination; and
- Stronger impact tracking on prevalence and remediation outcomes.

We have begun implementing these recommendations.

During 2025, further alignment with clients based on the CLMRS guidance published by the International Cocoa Initiative ("**ICI**") allowed us to improve in the areas outlined by Verité in their recommendations during the field review carried out in 2024, specifically around standardisation across programs and country level strategies. This work is also being replicated in Cameroon and Nigeria to further strengthen the systems that have more recently been implemented in specific supply chains in these countries.

Grievance mechanisms.

Speak-Up Platform

Any concerns related to modern slavery or child labour in our supply chain can be reported through the Speak Up platform. A third-party reporting Speak-Up platform was launched in December 2023. It is accessible 24/7 in over 70 languages via web, app or phone to employees, suppliers, customers and third parties and enables anonymous reporting. All submitted grievances are investigated by the relevant team (typically Group Legal or HR) and outcomes are monitored. ECOM strictly prohibits retaliation. The Speak Up platform is promoted through posters, HR training, and Anti-Bribery and Corruption trainings.

Nossa Voz (Our Voice) – Brazil:

A locally developed grievance mechanism supporting decent work in coffee farming communities, with training materials, a support line and a secure alert system; >500 workers trained; currently serving 22 farms and 4 companies.

Remediation process. Where a negative human rights impact has occurred, ECOM is committed to timely and effective remediation. Potential incidents are investigated promptly, with engagement of affected stakeholders and, where appropriate, notification of local authorities in serious cases. Remediation measures are tailored to the best interests of rightsholders and may include restitution or compensation. The remediation process is closely monitored through appropriate follow-up to verify completion.

This comprehensive monitoring and remediation process underscores our commitment to combat the persistent issue of child labour. We recognise that these issues can arise from various factors, including a lack of career opportunities for young people, poverty and seasonal labour patterns, as well as the lack of access to quality education. The knowledge gained from these collaborations is shared with clients to encourage investment in prevention strategies in the regions where ECOM operates.

Continuous improvement and collaboration with all stakeholders is at the core of our due diligence work. Through our supply chain, we strengthen engagement with business partners to better coordinate due diligence and share best practices. Responsibility is shared across the whole supply chain, and we expect our suppliers and clients to support us in this work. Our suppliers are obliged by us to cascade the due diligence principles further in the supply chain as outlined in our Supplier Code of Conduct.

6. TRANSPARENCY, TRACEABILITY AND CERTIFICATION

Transparency. In cocoa, we disclose our direct origin sourced cocoa supply chain annually on our website and have developed an interactive map to visualise our suppliers. We aim to maintain 100% traceability to farmer organisation/community for cocoa beans purchased through ECOM origin sourced supply chains.

Digital tools and data. To support ECOM's due diligence efforts in our partner-sourced supply chain, we have been partnering with data collection and supply chain specialists. In 2025, we successfully deployed Integrity, powered by BanQu (a third-party blockchain-based supply chain traceability platform), our supply chain First Mile transparency tool, across 4 countries, bringing the total number of origin operations using BanQu to 12. As of 2026, we have moved our partner supplier self-assessment and traceability into TRACT to centralise data collection and strengthen our EUDR preparedness.

Certification and verification. While we recognise that certification alone is not sufficient, independent standards help with assurance and transparency. Our supply chains engage with Fairtrade, Rainforest Alliance, Organic schemes, CAFE Practices, and cotton schemes including Better Cotton, Cotton made in Africa (CmiA), Regenagri and the U.S. Cotton Trust Protocol®. We maintain systems to avoid high risk sources (e.g., Brazil's Transparency List on Contemporary Slave Labour) and run customer specific verification programmes, verified through third-party audits.

7. TRAINING AND CAPACITY BUILDING

We raise awareness of modern slavery risks and our human rights approach through on the ground trainings across cocoa and coffee operations, complemented by internal training on our Code of Conduct, Supplier Code of Conduct and Supply Chain Due Diligence Policy.

Field technicians receive training on human rights, child labour and adult education methods; we also engage external experts including the ICI to strengthen CLMRS implementation and Verité to strengthen cooperative level grievance mechanisms around forced labour.

ECOM Group-wide policies and Codes of Conduct are regularly communicated to employees across the ECOM Group and, where applicable, to suppliers.

In 2025, ECOM introduced Ethics 101, a mandatory training module for all employees and which all new joiners must complete. The Ethics 101 training provides employees with an overview of where to locate and how to comply with the ECOM Group-wide policies, summarises the behavioural expectations set out in the ECOM Code of Conduct and the Supplier Code of Conduct, explains the availability of the Speak Up platform for confidential and anonymous reporting of concerns, and requires employees to attest that they know where to access policies, understand their compliance obligations, understand the Codes of Conduct, and know how to raise a concern when needed. ECOM are also developing a modern slavery-specific training module, which is scheduled for rollout later in 2026.

Our Sustainability Management Services ("**SMS**") teams operate across our origin sourced supply chains. For over 20 years, our SMS teams have worked closely with farmers to promote best agricultural practices which improve yields and build resilience against climate change. SMS teams also engage with farming families and communities to address social issues, such as poverty, gender equality and labour practices.

In 2025, SMS implemented 143 programmes across our coffee and cocoa supply chains, engaging with 450,000+ producers worldwide. ECOM also supports farmers directly through its sustainable service branch and by operating wet mills, handling post-harvest processing close to producers, ensuring quality and reducing spoilage as well as providing access to markets through client dedicated programs.

8. COLLABORATION AND INDUSTRY ENGAGEMENT

We believe collaboration is critical to long term impact. ECOM participates in and supports industry platforms and multi-stakeholder initiatives, including leadership roles with the World Cocoa Foundation and the ICI. We are a founding contributor to the Jacobs Foundation pooled funding facilities (Child Learning and Education Facility ("**CLEF**") and Early Learning & Nutrition) contributing financially to support the initiative's preventative strategy focused on addressing root causes of child labour in Côte d'Ivoire and strengthening social protection systems. We also serve on the advisory council for Verité's Farm Labor Due Diligence Initiative, and are part of Equal Origins' Industry Advisory Group, using its Gender Equity Index to inform Gender Equality and Social Inclusion strategies. These partnerships enhance our leverage and help scale effective practices: for example, we incorporate the work of both groups into our Smarter Cocoa Charter.

We also serve on boards and advisory groups in the cotton sector (e.g., International Cotton Association, Brazilian National Association of Cotton Exporters, African Cotton Association).

ECOM is a signatory to three voluntary national initiatives, the Swiss Platform for Sustainable Cocoa, the Swiss Sustainable Coffee Platform and Beyond Chocolate (the Belgian initiative for sustainable cocoa); all of these include targets related to the eradication/reduction of child labour.

9. MEASURING EFFECTIVENESS

Through the ECOM's management system ESMS, we track site and operational performance against environmental and social ("**E&S**") indicators and issue E&S Performance Reports. As part of our supply chain monitoring, we use the following activities to measure the performance of steps taken:

- **Internal audits**: ECOM conducts a periodic programme of internal audits to ensure that local policies align with ECOM Group policies.
- **Key performance indicators**: We closely follow the results from our supplier due diligence process to compare key performance indicators from one year to the next.
- **Whistleblowing**: See *Grievance mechanisms* above.
- **Third-party certification and verification audits**: We regularly verify the certification of suppliers.

ECOM maintains an independent internal audit function that reports functionally to the Audit Committee of the Board. The internal audit programme is risk-based and includes periodic reviews of ESG risks. Internal audits assess the design and effectiveness of controls, policies, and procedures across ECOM's operations and supply chains, including alignment with ECOM Group standards. Audit findings are reported to senior management and the Audit Committee, and corrective actions are monitored and tracked to completion.

As part of ECOM's Smarter Cocoa Charter, we implement, track and report the progress against various Key Performance Indicators. The Smarter Cocoa Charter was developed to unify our sustainability strategy across our diverse operations. Launched in 2021, we set 17 time-bound targets covering themes within the ECOM Group sustainability pillars: Sustainable Livelihoods, Nature & Climate and Traceability & Responsibility. In 2024, we added an additional nine KPIs that will help track our progress until 2030. These KPIs include our efforts to combat modern slavery and improve traceability and transparency in cocoa supply chains.

As of 2025, we have successfully closed twelve KPIs (more details on them can be found in our Cocoa Sustainability Reports). After four years of active implementation, we have learnt a lot about what it takes to reach our goals and the complexities that come with it. We recognise that meaningful impact requires flexibility, taking into consideration the complexities of diverse supply chains, as well as interventions specific to local contexts.

10. REGULATORY READINESS

In early 2025, we continued our preparations for the EU's Corporate Sustainability Reporting Directive ("**CSRD**"). The double materiality assessment ("**DMA**") of ECOM's impacts across the various commodities was completed, alongside a gap analysis evaluating current readiness to meet the CSRD reporting requirements.

However, following the postponement of CSRD's application and the EU Omnibus Package 2025 proposal, our focus for 2026 has shifted toward strengthening internal readiness, such as data collection and governance. In parallel, we advanced EUDR implementation by strengthening policies, risk screening and traceability/mapping systems.

We have continued to also develop supply chain standard operating procedures and engaging with suppliers. Additionally, we are improving our internal data flows, processes within our factories, and data sharing with clients.

In 2025, we formalised our EUDR process into an EUDR Internal Management System and went through a third party assurance process. Throughout this process we looked into ECOM's governance, approach to due diligence and legality, and end-to-end management of EUDR to ensure that it complies with the legislation.

11. LOOKING AHEAD

In 2026 and beyond, ECOM will continue strengthening its due diligence systems, risk management processes and overall readiness for emerging regulatory and market expectations. Building on the progress made in 2024–2025, our focus will be on deepening visibility across complex supply chains, enhancing the effectiveness of our monitoring and remediation systems, and further embedding responsible business conduct across all operations and commercial relationships.

Strengthening Due Diligence and Risk Management. Looking ahead to 2026, ECOM will continue refining its due diligence processes to balance comprehensive coverage with a risk-based approach.

We intend to enhance the accuracy and completeness of supplier risk screening by improving participation in our annual self-assessment questionnaire, simplifying the process for suppliers, and expanding follow-up reviews for higher risk respondents. This includes strengthening language accessibility, sector specific question sets and clearer expectations for corrective action plans. We also intend to strengthen engagement with suppliers in commodities where self-assessment practices are still emerging.

We plan to update the 2024/2025 country risk assessment and using it to prioritise the highest risk origins and supply chains for enhanced monitoring, targeted follow-ups, and preventative interventions.

We will expand the implementation of our Supply Chain Due Diligence Policy across all commodities, integrating feedback from suppliers, auditors, and partners.

In addition, we will conduct additional supply chain deep dives in four further other countries to increase our understanding of systemic risks and refine our engagement approaches.

Expanding Traceability and Digital Systems. ECOM will continue scaling the use of Integrity (powered by BanQu) and TRACT to strengthen first mile data capture and digital traceability across partner- and origin-sourced supply chains. This will support readiness for the EUDR while enhancing visibility into potential human rights, modern slavery, and child labour risks, streamlining due diligence processes - including the collection and retention of data- and enabling more robust reporting.

Enhancing Monitoring, Remediation and Community-Level Prevention. Key areas of focus include greater standardisation across countries including field staff capacity building, data collection and reporting, improved coordination, and enhanced resourcing for remediation. We will continue working with local communities, cooperatives and partners to address the systemic drivers of child and forced labour, such as household income constraints, limited access to education, and social norms.

Planned improvements in coffee supply chains include the first-time deployment of a Child Labour Rights Monitoring and Remediation System in Mexico. This initiative is being implemented in partnership with the NGO Terre des hommes and relevant supply chain actors, with partial funding from the Swiss Sustainable Coffee Platform. The system connects local child-rights protection organisations directly with agronomic field teams, enabling the identification of cases at farm level and the implementation of appropriate remediation measures.

We will continue testing and implementing measures to prevent child labour with support from the Fund Against Child Labour, as well as explore opportunities to work with other supply chain actors in improved systems for landscape level data collection on forced labour indicators.

Improving Measurement of Effectiveness. We recognise the importance of monitoring the effectiveness of our actions and will look to develop modern slavery specific KPIs that would complement our existing Smarter Cocoa Charter metrics and support clearer year-on-year reporting of progress and areas for improvement.

Building Capacity Across Our Business and Supply Chains. In 2026, we will launch a modern slavery specific training module for all relevant employees, building on our new Ethics Training programme.

We will expand capacity building for suppliers and cooperatives on due diligence expectations, grievance mechanisms, traceability and responsible labour practices. We will also continue strengthening alignment between ECOM Group level policies and local operational practices through internal audits and operational guidance.

Advancing Regulatory Readiness. We will continue preparing for future reporting obligations and other emerging regulations by enhancing governance structures and improving internal data collection processes.

Continued Collaboration. We will maintain active engagement in multistakeholder initiatives such as the World Cocoa Foundation, International Cocoa Initiative, sector specific cotton bodies, and national sustainability platforms. Collaboration across the supply chain remains central to addressing systemic human rights risks, and we will continue supporting collective action initiatives such as CLEF in Côte d'Ivoire.

12. APPROVAL

The Board of Directors is responsible for ensuring that ECOM's child-labour due diligence obligations are properly implemented and that this report is approved and published.

This Statement was approved by the Board of Directors of ECOM Agroindustrial Corp. Ltd in May 2026 and signed on its behalf by Alain Poncelet, Chief Executive Officer.

Alain Poncelet
Chief Executive Officer

ECOM

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