

Slavery and Human Trafficking Statement

This slavery and human trafficking statement is made on behalf of the Valeberg Group of Companies. This statement identifies the steps we have taken to mitigate the risk of modern slavery and human trafficking occurring in our operations or supply chains. The Group, consisting:

- Valeberg Ltd
- Valeberg Capital Ltd
- Valeberg Commodities Ltd
- Valeberg Ecosolutions Ltd
- Valeberg Engineering Ltd
- Valeberg Property Management Ltd
- Valeberg Telecom Ltd
- Valevox Ltd

As a Group of Companies, Valeberg provides various services and goods. The Group predominantly employs professionally qualified staff. Our offices also employ staff who provide administrative, facilities and business services. Our supply chain comprises suppliers offering us goods and services, enabling the Group to deliver its professional services. Most goods and services the Group procures are based in the IOM, Brazil, Canada and Turkey. The main categories of goods and services that we procure both directly and indirectly are:

- We procure a range of agricultural products, including sugar, maize, wheat, grains, and pulses.
- Information and communications technology (ICT) includes computer hardware and software, cloud services and SAAS providers, printers, online subscriptions, and mobile phones.
- Workplace services include stationery, office fit-outs, leasing, office management, utilities, cleaning, and security.
- Hospitality and catering, catering on-site and for events, venue providers and branded merchandise.

Our approach

The Group has a zero-tolerance approach towards any form of slavery, servitude, forced or bonded labour, or human trafficking (collectively referred to as 'modern slavery' in this statement). We will not support any arrangement or relationship that is knowingly involved in modern slavery. We are committed to ensuring that there is no modern slavery in our business or supply chains and acting ethically and with integrity in all our relationships.

Our practices for combating modern slavery

We consider the Group to be relatively low risk in terms of modern slavery, given the nature of our sector. Our current practices for combating modern slavery are outlined below.

Employment

We apply the highest possible standards in recruiting and employing our people. We conduct due diligence on prospective employees prior to their hiring. When recruiting, we comply with all local employment legislation and any applicable regulations.

All of our staff are expected to comply with relevant laws and professional codes of conduct, as well as our internal Anti-Slavery and Human Trafficking Policy, Whistleblowing Policy, and other policies and procedures.

We have committed to paying all our employees a fair living wage, and this commitment extends to the Group's contractors.

Training

We organise online training on modern slavery that must be completed by key individuals globally whom we have identified as dealing with any aspect of procurement on behalf of the Group. The Group-wide Anti-Slavery and Human Trafficking Policy forms part of the induction pack that is given to employees when they join the Group, and training is provided as necessary.

Our suppliers

At Valeberg, we have conducted a risk assessment across the different types of goods and services we procure to assess the risk of modern slavery or labour violations.

As part of the Group's supplier onboarding process, we use a vendor risk management platform to conduct risk assessments and perform due diligence across various relevant areas. This includes suppliers' modern slavery policies and practices, with one element of the due diligence process specifically focused on the interrogation of suppliers' modern slavery policies and practices and an expectation that their methods are as stringent as ours as a minimum. We also perform these assessments on our legacy supplier base, prioritising our larger suppliers by spend and those that we consider to provide services at higher risk of modern slavery or labour violations.

The Group does not demand anything from such suppliers that may lead them to violate laws, including modern slavery. We encourage them to improve their own compliance with anti-slavery laws and to communicate this through their supply chain.

We have a Supplier Relationship Management (SRM) programme in place with our key suppliers, with a regular meeting cadence at which risk concerns can be raised and addressed. Regarding existing suppliers of goods and services, our due diligence has not identified any occurrence of modern slavery. We also require such suppliers to conduct due diligence on their suppliers.

Our team have received additional training specifically focused on their role in combating modern slavery and labour violations.

Third-party professionals

We have a pro forma letter of engagement for instructing a third-party professional, such as an expert or a foreign lawyer. In this pro forma letter, we require the third-party professional to warrant that they comply with labour, anti-slavery, and human trafficking laws, including but not limited to the UK Modern Slavery Act, and that any subcontractor used by the third-party professional in relation to the engagement does likewise.

Steps that we will be taking to combat modern slavery in this financial year

- We will continue to roll out online training on modern slavery to all relevant staff.
- We will contract with new suppliers wherever possible based on our pro forma contracts. Where it is not possible to contract based on our pro forma contract, we will ensure that modern slavery issues are addressed in each contract.
- We will increase the levels of due diligence performed on both new and existing suppliers regarding modern slavery, ensuring that such checks are adhered to as part of our global Procurement Policy.
- We shall continue to roll out our Supplier Code of Conduct to our supplier base.
- We will conduct a review of our supply chain to ensure adherence to our Supplier Code of Conduct.
- We shall develop practices for scrutinising third-party relationships within our supply chain and their adherence to modern slavery legislation.

Valeberg's Management Board approved this statement on behalf of the Group.

Darren J Harris

Founder / Managing Director

For and on behalf of the Valeberg Group of Companies

1st August 2025