

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FY2025**

This statement has been prepared in accordance with section 54(1) of the Modern Slavery Act 2015 in respect of our financial year commencing 1 September 2024 and ending 31 August 2025 ('FY2025'). This statement covers all of Oterra's affiliates (the "Group") and sets out the steps we take to prevent modern slavery occurring within our business and our supply chains.

## **Our Mission**

Oterra Group is firmly committed to respecting human rights for all. As signatories to the United Nations Global Compact, we strive to positively impact our stakeholders and to achieve the highest professional, legal, and ethical standards in how we conduct our business. Particularly, we have taken a stand against all forms of slavery, forced or compulsory labour, child labour and human trafficking. All the companies comprising our Group are committed to preventing the occurrence of these activities within our business and our supply chains.

## Our Group and supply chains

Headquartered in Denmark, Oterra is the world's leading supplier of natural colors. We have 12 production sites globally, and a team of around 1200 employees located in close to 30 countries worldwide. Oterra's supply chain network spans all regions of the globe and is primarily focused on the sourcing of agricultural raw materials. Oterra is a member of SEDEX and all our main production sites are SMETA audited on a recurring basis.

#### **Our Policies**

We are committed to the protection of internationally proclaimed human rights, the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. We have reflected this goal of acting ethically and with integrity in our internal policies. Our Code of Conduct is our highest internal standard and contains our aim to fight modern slavery and human trafficking. In addition, Oterra's Human Rights Policy states our commitment to respecting human rights, including the prevention of modern slavery and human trafficking.

The effectiveness of our policies and procedures are continuously reviewed and updated to ensure that they are robust enough to identify any potential issues or risks.

## **Risk Assessment**

At Oterra, we understand that determining modern slavery and human trafficking risks is essential for the organization to have the precise means to prevent, detect and manage them. Said exercise is developed considering not only the particularities of the organization itself and its products, but also the markets in which we operate and source our raw materials and other supplies from. For that reason, our Group has various ways of collecting data and information about why and how risks occur. These include: (a) Third- Party audit reports and (b) Oterra audits on suppliers sites in high-risk regions (c) with the assistance of SEDEX Radar (a risk assessment tool) we have access to information about



(i) cases of human rights violations in the sectors and countries our suppliers operate in; and (ii) analysis of specific areas and activities of potential interaction directly or indirectly with interest groups that may affect human rights; and finally, (d) internal workshops to explore risks in the various activities of the company.

# **Due Diligence**

At Oterra, we firmly believe that to achieve the highest professional, legal, and ethical standards, we must ensure that our business partners in our supply chain are aware and fully committed to not only respecting human rights in general, but also particularly with the prevention of modern slavery and human trafficking. Members of our sourcing team often live and work in the areas where our crops are grown and where the risk of modern slavery and human trafficking is greater. We have close contact with our growing partners, we conduct regular visits to the facilities of our main suppliers, and in high-risk regions, we conduct audits on suppliers' sites.

## **Performance Indicators**

In order to assess the effectiveness of our modern slavery measures, we review the following key performance indicator:

• Recorded cases of human rights abuse or human trafficking within business or supply chain

This KPI is further monitored as part of our wider sustainability strategy, which is regularly reviewed by the Oterra Leadership Team and included in the annual wheel for Oterra's Board Meetings.

## **Communication**

We are aware that the implementation and success of our organization's human rights policies derive, among others, from the ways of acting of our employees, and hence it is considered vital that they always have access to information that allows them to know what is expected of them and how to act. For that reason, in 2024 we proactively trained our white-collar employees on the Code of Conduct which includes our position on modern slavery and human trafficking. Our Code of Conduct, as well as our Human Rights Policy which also contain modern slavery and human trafficking statements, are available to all employees on our company intranet platform.

This statement has been approved by the Oterra Board of Directors and will be subject to an annual review.

Date 8/15/2024

signed by:

Martin Sountag

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**Martin Sonntag - Group CEO**