



Cafea UK Ltd /
European
Coffee
Corporation Ltd
Modern Slavery
and Human
Trafficking
2025



Cafea UK Limited
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Introduction

This is our seventh modern slavery statement and is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Cafea UK Ltd has taken and is continuing to take to try and prevent modern slavery or human trafficking taking place within our business or supply chain. This statement also covers the requirement for European Coffee Company (ECC) which is a non-trading holding company.

Organisation Structure



Cafea UK Ltd is part of the Cafea Group which is a privately-owned group of companies with the head office in Hamburg, Germany.

There are eight manufacturing sites within the group, the main focus being instant coffee, but other products such as liquid coffee, cappuccinos, hot chocolates, baby foods formula, creamers and coffee substitutes also feature. The packaging formats are varied and include; bulk bags, 25kg bag in box, tubs, tins, glass jars, individual sachets and pouches.

Cafea UK is based in Dunstable where it processes and packs instant coffee. The manufacturing site was purpose built in 1995 and carries out blending, agglomeration (granule-forming) and packing of instant coffee and hot chocolate. The site has one agglomerator and four packing lines. The UK operation employs 65 staff in total, with 28 in production, operating a two-shift system, 5 days a week. Finished products are packed either into glass jars, tins or flexible pouches. The company also packs instant coffee in 25kg boxes for other food manufacturers.

The company also sells products produced by other Cafea group companies and sourced from 3rd party suppliers to retail supermarkets, wholesale outlets and food services providers in the U.K. and Europe. These include instant coffees and cappuccinos, hot chocolates, roast and ground coffee, coffee bags, coffee pods and drinking chocolates.

Supply chains



Food

In the supply chain of our products, we have identified greater risks in the countries of origin of commodities and have initially considered these supply chains. Coffee is our main raw material commodity followed by sugar and cocoa.

Packaging

Our main primary packaging^{*1} is glass jars and plastic caps, but we also use big bags, 25kg bag in box, tins and pouches with supply coming mainly from the UK. We purchase directly from these suppliers, which means we have greater connection to the site and more influence over site standards affecting labour issues.

Commodity Sourcing Countries

Coffee, sugar cane and cocoa are grown anywhere between the two tropics and sugar beet in more temperate climates, therefore our supply chain map covers Africa, Central and South America Asia, Caribbean, Europe and Oceania.

Our supply chain consists of 45 manufacturing sites from 11 countries, who in turn take supply from many other countries. At present our products contain ingredients whose origin can be traced back to one of 31 countries^{*2}.

In the UK and with this statement, we are focusing on our raw material (instant coffee that we import from country of origin) and packaging that are used at our manufacturing site in the UK, and the risks at any site directly supplying Cafea UK with any form of product.

For imported semi or finished pre-packed goods that we buy from other companies, where they are the first importer from country of origin, it is their responsibility to assess their supply chain for modern slavery risks. This is covered by country specific laws and soon to be EU wide legislation that will prohibit products made with forced labour from being sold in, imported to, or exported from, the EU.

^{*1} BRC Global Food Standard Definition - The packaging that constitutes the unit of sale to the consumer or customer (e.g. bottle, closure and label of a retail pack or a raw material bulk container).

^{*2} E.U has been counted as one country



Relevant policies

Cafea Gruppe Sustainability and Ethical and Human Rights

Protecting human rights and the environment in the coffee supply chain is important to the Cafea Group, we want to work together with our customers and suppliers to make a proactive contribution to transforming the global aims of the Sustainable Development Goals (SDG) into reality.

As targets to be achieved by 2030, the 17 Sustainable Development Goals of the United Nations also formed the basis of our seven focal points for the conception of our sustainability strategy. For now this covers 4 fields of action in the three areas of ecology, social responsibility and economy.



The Cafea Group, which is headquartered in Germany, follows the German Law on Due Diligence in the Supply Chain (LkSG) to monitor compliance with human rights and environmental regulations in the supply chain.

Cafea Group is a member of the German Coffee Association, which has set up an action group (including several large coffee companies) to meet the requirements of the LkSG. The coffee supply chain risk assessments are compiled in collaboration with GRAS (a global risk assessment services company).

Adopting 8 fundamental principles and rights at work from the International Labour Organisation (ILO), the main focus is child labour and forced labour. Countries of origin have been identified from the largest coffee producing country down to countries that provide 1% of the European demand and for every country a risk assessment report will be generated.

The first initiative is an anonymous whistle blowing system called Ear4u.org. which is available in many languages and can be accessed by a website, an app or via a phone number. A project in Brazil has shown that in order to expand effective grievance mechanisms, very strong educational and training work is needed at the local level.

Ear4u is a global platform and we identify local partner organisations in country of origin with whom we can work and who work directly with the farmers. In Brazil we have identified a partner organisation. The next coffee country we want to develop for ear4u through the GRAS team is Vietnam.



CAFEA UK Sustainability Plan

At the start of 2020 we established a Sustainability Plan, an ongoing project caring for the planet and people. One of the main areas of focus was 'Drive Ethical Sourcing'. New targets are set each year.

Human Rights Policy

This newly created policy covers the approach Cafea UK is taking towards ensuring the Human Rights of all workers through the supply chain are protected, specifically covering forced labour, child labour and gender equality.

Ethical Policy

This policy details the main elements that reinforce our ethical approach such as; Cafea Group Ethical and Human Rights Statement, SEDEX, Modern Slavery Act, Stronger Together Initiative, Anti-bribery Policy and our Supplier Code of Conduct. This has been shared with customers and suppliers and published on our website.

Code of Conduct

We operate a zero-tolerance approach to slavery and human trafficking and expect our suppliers to comply with this standard. We have created a Code of Conduct that requires our supplier's agreement, which includes an obligation to register with SEDEX and to comply with the ETI base code. There is also a requirement to gain awareness of the Modern Slavery Act and supply chain issues with the aim to ensure that there is no modern slavery or human trafficking within our business, our supplier's businesses or our supply chains.

SEDEX

Cafea UK has been committed to complying with the ETI base code since its launch and have been members of SEDEX since 2005. We had our first ethical audit in 2004 and continue to undergo SMETA audits routinely, as do many of the other Cafea Group companies.

Supplier Approval and Management

When a potential new supplier is identified, they are sent our Code of Conduct and must complete a Self-Assessment Questionnaire which asks for their SEDEX Company / Site code. It is a condition of supply that they register with SEDEX and link to Cafea UK. The current supplier base is also being contacted and encouraged to sign up to SEDEX as we move through the packaging tiers.

Due Diligence Processes

All suppliers of raw material and primary packaging to CAFEA UK have to go through a supplier approval process, which includes a questionnaire, certification review and a possible audit.

The primary packaging suppliers are audited on a risk-assessed basis by CAFEA UK in person, this is primarily a food safety and quality audit but also covers ethical aspects such as policy details and evidence of any discrimination or restriction of personal rights.

Traceability exercises are routinely carried out with packaging suppliers and product suppliers to trace green beans back to the country of origin so that we have full visibility of the supply chain.



Approximately eighty percent of our products are sold in compliance with FT or RFA standards, forced labour is prohibited in the FT Standard and the RFA Certification programme has a “assess and address” approach to tackling human rights issues such as forced labour, which will not be tolerated. All business throughout the supply chain undergo audits, but the focus is at the start of the supply chain on the farms in the country of origin where the risk of modern slavery is highest.



We subscribe to the principles of Stronger Together, a multi-stakeholder initiative aiming to reduce modern slavery, particularly hidden forced labour, labour trafficking and other third-party exploitation of workers within the supply chain.

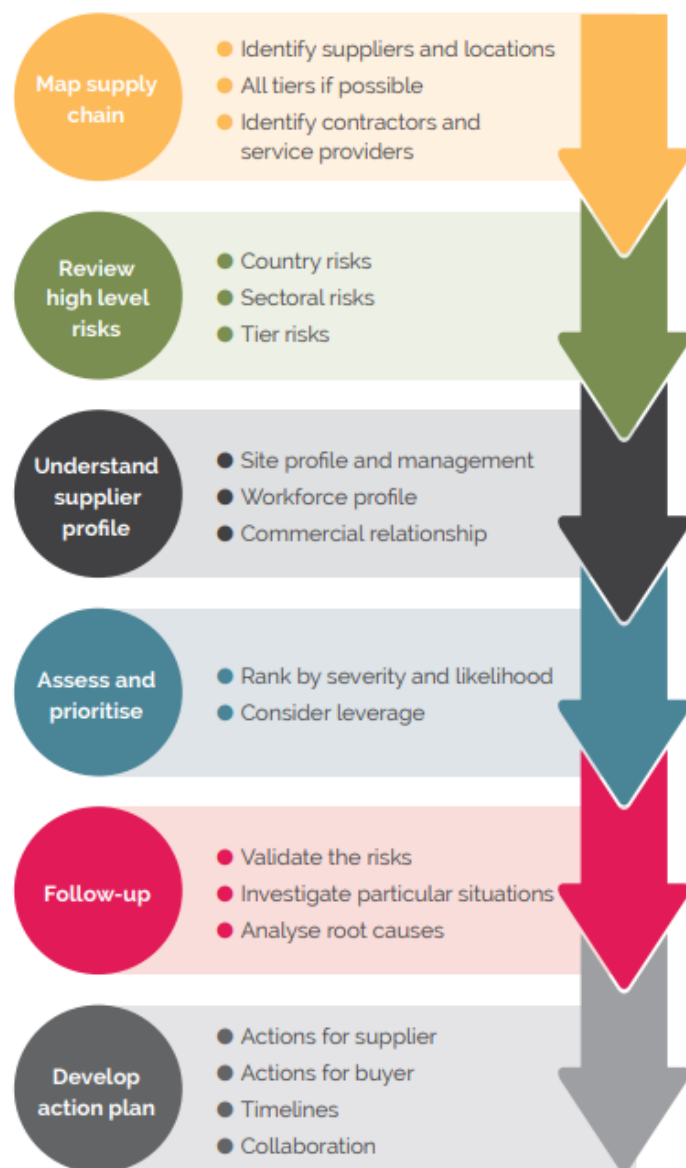


CAFEA UK are members of the British Coffee Association, an industry run body that works to keep members informed of many different topics relating to coffee. We actively participate in the Associations’ Sustainability Sub-group, covering topics such as sustainability, transparency, modern slavery and human rights.



We also subscribe to several industry newsletters and attend customer lead sessions covering such topics as Stronger Together and the Modern Slavery Act.

Risk assessment and management



Our supply chain is large and complex. We know that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global issue, existing in every region in the world and in every type of economy. No sector or industry can be considered immune or untainted. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Once again, to help us achieve this, we are targeting our actions where they can have the most impact by prioritising our risks, using SEDEX.

SEDEX risk assessment tool

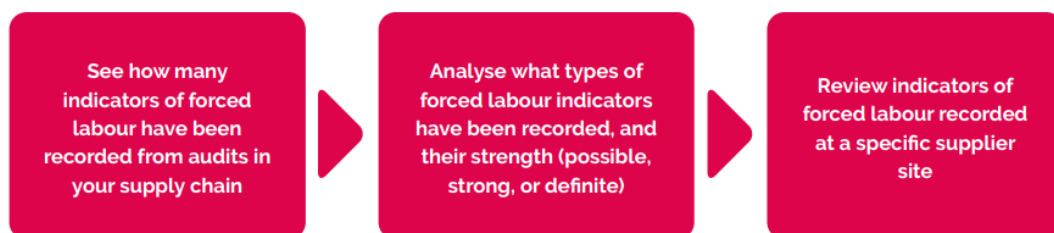
SEDEX enables us to conduct a risk assessment of our business and supply chain, assessing risks by country and sector and also by site.

The tool contains risk data based on independent and reputable sources that assess risks in the four SMETA pillars and 14 risk topics. SEDEX also includes site data that is based on information uploaded by suppliers, in their profile and Self-Assessment Questionnaire (SAQ), and from third-party audit reports.

Previously we looked at our suppliers in the various countries, this year we are looking into where they source the coffee from and we will be assessing the risks in these countries as well and taking action if needed. We have sent our Human Rights Policy to our suppliers and the RADAR Pre-Screen for coffee in their country (next page) asked them to respond with the actions they are taking to reassure themselves that there is no forced labour in any of the farms growing the coffee that the process. We also visited three of our main suppliers in Brazil where we discussed this topic.

Direct Suppliers: SEDEX Forced Labour Indicator

The aim of the SEDEX Forced Labour Indicator Tool is to draw attention to operational indicators of forced labour within the SEDEX supply chains. These indicators can - either independently or in various combinations – indicate the potential risk of forced labour through a worker's employment cycle. The reports within the tool draw on non-compliances and observations raised during audits to identify where operational indicators have been identified within the supply chain. The number of indicators identified at specific sites, and their strength (definite, strong or possible), are weighted to calculate a site's audit indicator score. This is presented alongside additional risk information that can help to understand if the site is exposed to forced labour risks, such as the risk of forced labour within the country and sector, the presence of vulnerable workers and the site's employment practices.



We looked at the data available for the sites that have had audits in the last three years:

- 10 sites with **possible** indicators - clear and serious violations
- 3 sites with **strong** indicators - significant concerns that may suggest the presence of forced labour and therefore require further validation
- 0 sites with **definite** indicators - minor or contextual concerns that do not confirm forced labour but warrant continued monitoring

It is encouraging to note that none of our supplying sites exhibited any definite indicators of forced labour. Following our review of the strong indicators one site has fully resolved the issues identified, while two sites still have outstanding actions to complete. We will be following up directly with these suppliers.

Among the ten sites flagged with possible indicators four still have outstanding issues to address. We will continue to monitor these sites and evaluate progress through subsequent audits.



FAQ: What are the indicators of forced labour?

The forced labour indicators used within the tool are drawn from the Sedex Guidance on Operational Practice & Indicators of Forced Labour, which builds upon the International Labour Organisation (ILO)'s eleven indicators of forced labour:



Abuse of vulnerability



Retention of identity documents



Deception



Withholding of wages



Restriction of movement



Debt bondage



Isolation



Abusive working and living conditions



Physical and sexual violence



Excessive overtime



Intimidation and threats

To translate the ILO's indicators into the context of social audit non-compliances and observations, Sedex has introduced an additional category of management systems failures is used within the forced labour indicator framework. Management systems are critical to ensuring compliance with the law and a failure in management systems can indicate an increased risk of forced labour.

Country of Origin: SEDEX Pre-Screen: Commodity Risk Assessment

The pre-screen demonstrates inherent risk associated with commodities and their country of origin – this reaches further into our supply chain and gives an idea of the standards experienced by producers and growers. So that we can assess the risks most closely linked to our business we focused on the country where we purchase the most coffee. Below you can see the Brazilian SEDEX pre-screen, indicating a high inherent risk for people working in coffee agriculture in Brazil. There is also a break down of the higher labour standards risk and if there is evidence of forced or child labour in the product sector.


Country/region and sector risk

Assess the risk profile of potential suppliers or markets by country/region, and sector. [Learn more about risk scores](#)

*Country/region: 1
 Sector:
 Sub-sector:
 Activity:

Overall inherent risk

☐ All countries



Low risk
Medium risk
High risk

Brazil

6.6/10
High risk

Inherent risk by pillar

All scores by pillars: **Labour standards** Health and safety Business Ethics Environment

Labour standards

Pillar	Brazil
Overall	6.8 High risk
Children and young workers	7.8 High risk
Discrimination	6.3 High risk
Forced labour	8.6 High risk
Freedom of association	6.4 High risk
Gender	5.6 Medium risk
Regular employment	6.7 High risk
Wages	6.5 High risk
Working hours	6.2 High risk

Product risks

While based on credible sources like the US DOL and Forest 500, the Sedex list of high-risk goods is not exhaustive. If a product isn't flagged, it may still carry human rights or environmental risks.

Product risks	Brazil
Child labour	Reported evidence
Forced Labour	Reported evidence

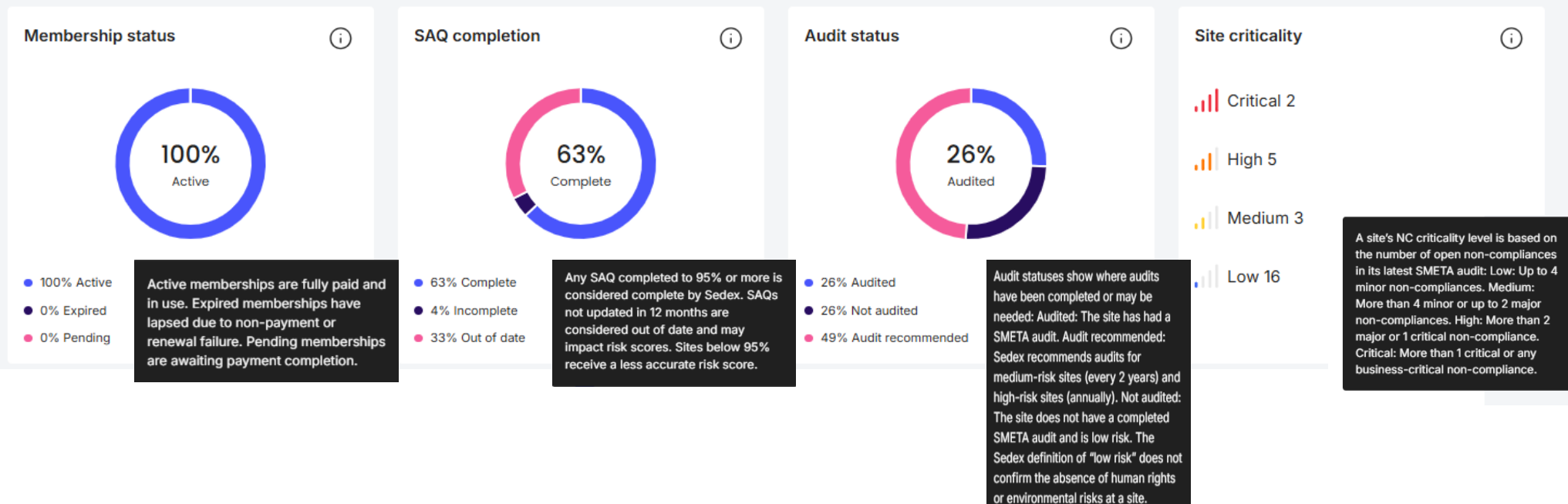
During 2025, we visited our suppliers in Brazil and engaged with them on their human rights standards, including how they monitor their supply chains and assure themselves that no issues are present. Most of our coffee is sourced under Rainforest Alliance or Fairtrade certification, both of which include audit components related to human rights. Our suppliers confirmed that, through these certification audits and the use of the Brazilian “Dirty List” (Blacklist of employers found to have engaged in forced labour), they are confident that the risk of modern slavery within their operations—and consequently within our supply chain—is being effectively minimised.

Key performance indicators

Going forward we are going to report using the KPI overview in SEDEX (diagram below). Next year we will assess how well we have done against the scores below.

KPI overview

The latest performance updates for your supply chain



Conclusion

We are confident that our policies, due diligence processes, certification requirements, risk assessments, and strong supplier relationships place us in a robust position to mitigate the risk of modern slavery occurring in our supply chain without our knowledge. The reporting mechanisms and traceability provided through certified coffee continue to strengthen—particularly in response to EUDR requirements—enhancing our visibility over our supply chains and, in turn, the standards upheld at the farm level.

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Training

We have trained key members of staff in Modern Slavery and Stronger Together due induction to the business and using attendance of specific conferences on the subject, customer run briefings and email updates from various sources. This will continue in the future.

Plan for 2026

We will work on the following points in the coming year and report on our progress in the next statement:

- Work closely with our suppliers with outstanding strong indicators and monitor closely the outstanding possible indicators.
- Encourage all our suppliers to register on SEDEX and fully complete their SAQ.
- Put more emphasis on sites having a SMETA audit as the information gathered from these truly reflects the activities on site more than the SAQ
- We will collaborate with our colleagues within the Cafea Group as they work to meet the requirements of the German Law on Due Diligence in the Supply Chain (LkSG) so that we might learn and share knowledge together to improve the workers rights throughout the coffee supply chain.

This statement was approved by the Board of the Cafea Group GmbH

A handwritten signature in black ink, appearing to read "SBentley".

Sonja Bentley
Managing Director