



# Modern Slavery Statement 2025

## INTRODUCTION

This Modern Slavery and Human Trafficking annual statement is published in accordance with Section 54 of the UK Modern Slavery Act 2015. It outlines the steps James Finlay Limited ('Finlays') has taken to mitigate the risks of modern slavery during the financial year ended 31 December 2025.

Modern slavery can include slavery, servitude, forced or compulsory labour and human trafficking. Forced labour can take many forms, including work exacted through physical or psychological coercion, debt bondage, retention of identity documents, restrictions on freedom of movement, threats, deception or abuse of vulnerability. The International Labour Organization (ILO) and Walk Free [estimate](#) that more than 27 million people are in forced labour globally. Agricultural supply chains, including tea and coffee, can present heightened risk because of the use of seasonal, informal and migrant labour, complex upstream supply chains and limited visibility in some sourcing contexts.

Respect for human rights is fundamental to Finlays and to the way we operate. We are committed to upholding labour rights in our own operations and supply chain, including the Ethical Trading Initiative (ETI) Base Code. We recognise that preventing modern slavery requires continual improvement, strong governance, meaningful engagement and a risk-based approach to human rights due diligence (HRDD).

Across the countries and cultures in which Finlays operates, we recognise that, while local contexts may differ, our commitment to respecting human rights is not relative: it is grounded in a common understanding of what is right and wrong, and in the shared values that guide how we do business. Those values exist for moments such as these, to ensure that every part of Finlays applies the same fundamental expectation that people are treated with dignity, fairness and respect.

Finlays' [Human Rights Policy](#), Sustainable Sourcing Policy and [Code of Conduct](#) prohibit the use of all forms of forced labour and child labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking anywhere in our own operations in our supply chain.

## SCOPE OF BASIS OF REPORTING

This statement covers James Finlay Limited and the Finlays group of companies<sup>1</sup>, including but not limited to James Finlay Limited, Finlay Beverages Limited and Finlay Hull Limited. It focuses on modern slavery and other severe labour exploitation risks where these relate to identifying, preventing, mitigating or remediating forced labour, human trafficking, child labour and related severe human rights impacts.

Information used to prepare this statement was gathered through the review of Finlays' 2024 Modern Slavery Statement, benchmarking against UK Government reporting guidance and leading practice expectations, key stakeholder interviews across own operations and supply chain teams at Head Office and Business Units, Finlays' HRDD documentation, and 2025 data. The statement has been prepared in alignment with Finlays' 2025 Sustainability Report, with the aim of avoiding duplication where possible.



<sup>1</sup> Finlays holds a 49.5% share in Damin International Holdings Limited, China, which was previously referenced in our reporting, and a minority (30%) interest in NewTree, acquired in 2025. As we do not have operational control over either entity, they are not included in this report.

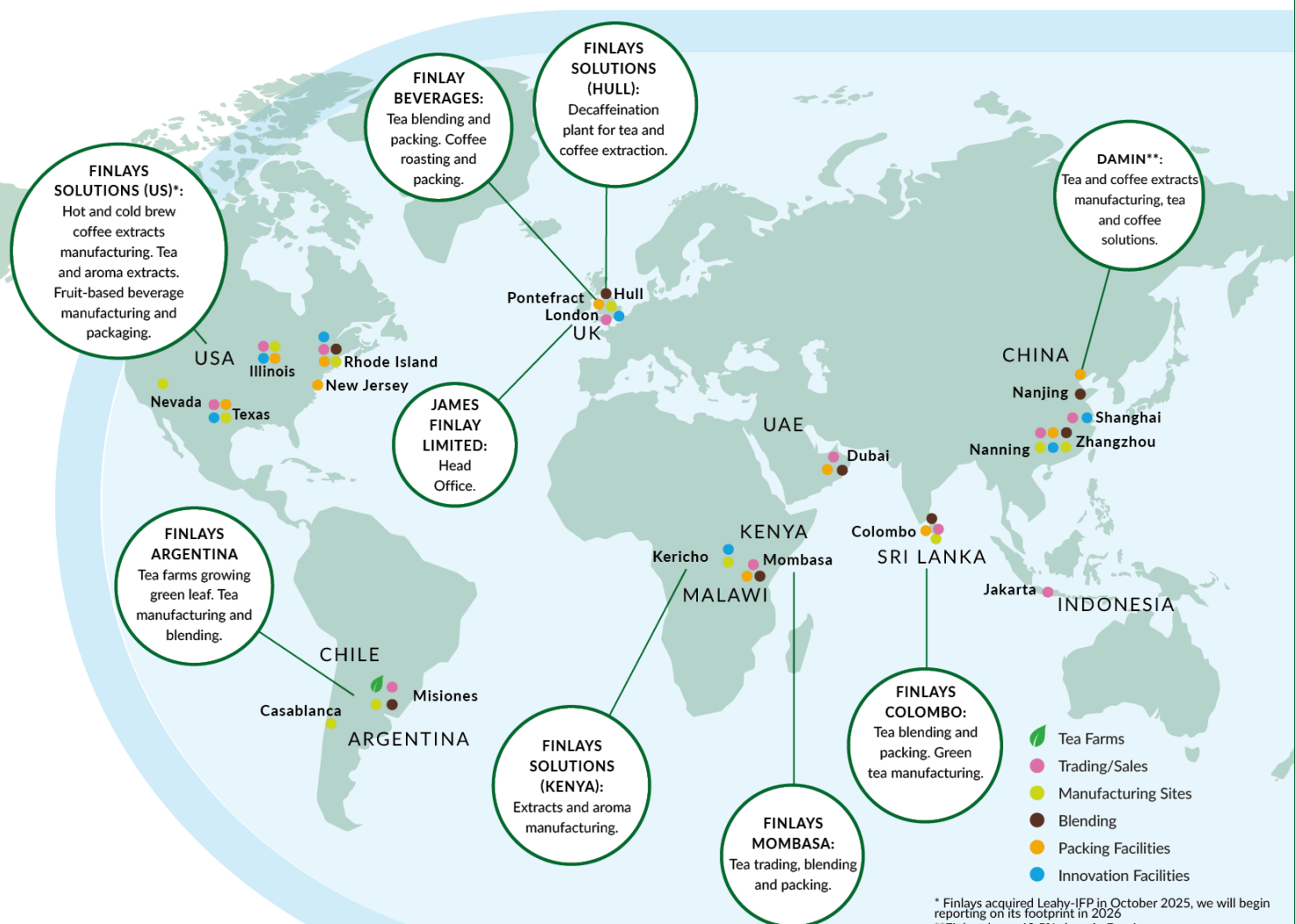
# ABOUT FINLAYS

## STRUCTURE AND OPERATIONS

Finlays is a leading B2B manufacturer and supplier of tea, coffee, botanical and fruit-based ingredients and beverage solutions. Headquartered in the UK, Finlays operates across diverse geographies, cultures and languages. While respecting local contexts, we seek to maintain a common operating culture grounded in our values and human rights commitments.

- We own a tea estate and black tea manufacturing facilities in Argentina, and a tea extraction facility in Kericho, Kenya.
- Finlays has strategically shifted its main focus away from tea growing, to providing extracts solutions. We continue to play a major role in buying tea globally, and we have direct contracts with producers in all major tea-growing regions and also purchase through auctions. For coffee, we source from cooperatives and mills, many of which we have direct contracts with. We own and operate a number of manufacturing sites for both tea and coffee, where we turn raw materials into finished products for our customers. We have commercial functions within the business units supporting customers around the world by supplying tea, coffee and botanical products, either from our own or third-party facilities.

In October 2025, Finlays acquired Leahy-IFP, a major aseptic packer and formulator of natural fruit-based beverages headquartered in Glenview, Illinois. Leahy-IFP has been integrated into Finlays Solutions as of 2026 and this will be reflected more fully in the next modern slavery report.



\* Finlays acquired Leahy-IFP in October 2025, we will begin reporting on its footprint in 2026  
 \*\*Finlays has a 49.5% share in Damin

## EXECUTIVE SUMMARY - PROGRESS AND ACTIONS IN 2025

- **Embedding HRDD across our business** - We continued to embed our HRDD framework across Finlays, moving from group-level risk assessment into practical implementation. This included developing a comprehensive HRDD action plan and roadmap to 2030, appointing HRDD champions across the business, and holding workshops, salient risk prioritisation and action planning, while Business Units progressed local implementation.
- **Reducing workforce vulnerability** - We maintained our focus on addressing workforce vulnerability in our own operations. In 2025, Finlays reduced the overall use of temporary and contractor workers by approximately 10%, supporting greater employment stability and visibility of workforce arrangements and continued to strengthen oversight of agency, temporary and contractor labour in the UK, Colombo and Mombasa. We also progressed our 100% living wage commitment, reaching 75% of direct employees by the end of 2025.
- **Training** - We continued capability-building on modern slavery and human rights through in-person compliance training sessions covering modern slavery and human rights, delivered in selected sites, including Dubai, Kericho, Mombasa, and Rhode Island and San Antonio, US.
- **Increasing supply chain transparency** - We strengthened supply chain transparency by achieving 100% traceability for made leaf tea, green leaf tea and soluble coffee, and 99.4% traceability for green bean coffee by end of 2025. Certification coverage also increased, with 75% of tea and coffee volume certified by Rainforest Alliance or Fairtrade, up from 66% in 2024.
- **Strengthening supplier risk management** - We continued to mature the Supplier Relationship Management (SRM) programme and, in 2025, 100% of strategic suppliers had been approved under the programme, and 95% of tea and coffee volume purchased from approved suppliers, up from 88% in 2024 and 59% in 2023. We expanded beyond tea and coffee to include direct materials and services, including ingredients and primary packaging, to support a broader and more consistent view of supply chain risk. We also rolled-out a third-party compliance and risk management system across key supplier categories. We used supplier due diligence findings to inform risk-based follow-up. Supplier questionnaires and visits identified recurring risks including excessive overtime, weak grievance mechanisms, high use of temporary work, withholding of identity documents, and gaps in oversight of labour providers and contractors. Follow-up actions included clarification requests, corrective action plans, supplier visits, linking up on Sedex, and ethical or human rights audits where appropriate.
- **Continued industry collaboration** - We continued collaboration on systemic risks by continuing to engage with the Ethical Trading Initiative (ETI). Finlay Beverages joined the ETP (formally Ethical Tea Partnership) in 2025 to support collective action on human rights, livelihoods, inequality, deforestation and sustainable farming practices in tea supply chains. We also continued engagement with Browns Plantations Kenya, where the two-year project - Project Kulinda - formally concluded in December 2025 and remaining actions are being embedded into business-as-usual operations.



# BUSINESS STRUCTURE AND WORKFORCE



In 2025, Finlays employed 1,756 people globally, of whom 26% were women and 74% were men. During the year, we reduced the overall use of temporary and contractor workers by approximately 10%, supporting greater employment stability and improving visibility of workforce arrangements across our own operations.

Country	Total Number of Employees	Male Employees	Female Employees	Temporary and contractor workers
Argentina	320	279	41	13
China	4	2	2	0
Indonesia	2	1	1	0
Kenya	508	398	110	98
Malawi	3	3	0	0
Sri Lanka	231	188	43	125
United Arab Emirates	6	4	2	2
United Kingdom	429	279	150	11
United States of America	253	154	99	24
<b>TOTAL 2025</b>	<b>1,756</b>	<b>1,308</b>	<b>448</b>	<b>273</b>

Notes: Total employee data covers the headcount of permanent and fixed-term employees of Finlays as at 31st December 2025. Temporary workers and contractors are individuals who carry out short-term assignments for the Company. The majority are employed by a third party, such as an agency or supplier.



# SUSTAINABILITY STRATEGY AND HUMAN RIGHTS GOVERNANCE

Finlays' Sustainable Future 2030 strategy sets out our ambitions across three pillars: Climate Net Zero, Sustainable Supply and Our People. Human rights are embedded most directly in the Our People and Sustainable Supply pillars and are central to our commitment to ethical and sustainable sourcing by 2030.



**SUSTAINABLE FUTURE 2030**  
**PILLARS AND PRIORITIES**



**CLIMATE NET ZERO**  
*Protecting the Planet to Safeguard Natural Beverages*

**Achieve 50% reduction in Scope 1 & 2 emissions by 2030 and net-zero emissions by 2040\***

- Focus Areas**
- Scope 1, 2, 3 and FLAG emissions reduction roadmaps
  - Supplier engagement programme
  - Carbon mitigation approach
  - Framework for protecting nature



**SUSTAINABLE SUPPLY**  
*Building Trusted Partnerships for Stronger Supply Chains*

**Sustainable and ethical sourcing across tea, coffee, and extracts by 2030**

- Focus Areas**
- Improve traceability
  - Enhanced supplier due diligence
  - Manage performance and risk of key suppliers
  - Partner with suppliers on continuous improvement



**OUR PEOPLE**  
*Advancing Human Rights to Empower All*

**A business where people are valued and treated fairly, encouraging growth and development**

- Focus Areas**
- Human Rights Due Diligence approach
  - Achieve 42% women in management by 2030
  - Build a culture of belonging where everyone feels engaged, connected and empowered
  - Become a Living Wage Employer by 2030

In 2025, Finlays continued to embed HRDD across the business, with a focus on governance, leadership expectations and practical implementation support for Business Units. We developed a comprehensive HRDD action plan and framework, appointed HRDD champions across the business, and supported Business Units to develop HRDD roadmaps, salient risk prioritisation and action planning. Workshops were held with Business Units to discuss HRDD tools and local grievance procedures.





## GOVERNANCE

Within our own operations, accountability and responsibility for human rights and modern slavery sit at James Finlay Limited with the People Director and the Director of Corporate Affairs. They are supported by a working group comprising the HR Directors from each business and the Head Office Sustainability team.

For our supply chain, responsibility for human rights and modern slavery sits with the Director of Corporate Affairs, supported by a cross-functional working group consisting of Head Office Sustainability, Compliance and Quality, as well as key stakeholders from Sustainability and Sourcing at business unit level.

Commitment and delivery at operating company level is owned by the Managing Director of each business. All Directors report to either the JFL Managing Director or the JFL Chief Operating Officer.

The board of James Finlay Limited provides oversight of the Group's sustainability agenda, including our approach to human rights and modern slavery. Formal approval of this statement is provided by the Managing Director on behalf of James Finlay Limited.





## POLICIES AND STANDARDS

Finlays' Human Rights Policy, Sustainable Sourcing Policy and Code of Conduct align with the UN Guiding Principles on Business and Human Rights, the UN Global Compact (of which Finlays is a member), and the ETI Base Code. They prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. These policies apply to James Finlay Limited and its majority owned subsidiaries. Our commitment to people is supported by our policies, memberships in multi-stakeholder initiatives and governance.

### **Human Rights policy**

As an Ethical Trading Initiative (ETI)<sup>2</sup> member, Finlays has adopted the ETI Base Code of labour practice within its operations and supply chains. The ETI Base Code is built on the Conventions of the International Labour Organisation (ILO) and covers issues such as freely chosen employment, child labour, wages, working hours, health and safety, discrimination and freedom of association. These expectations are reflected in Finlays' Human Rights Policy, which is published externally and available to employees.

### **Sustainable Sourcing Policy**

We consider that the greatest risk of modern slavery, human trafficking and child labour is in our supply chain where operational oversight is out of our direct control. We therefore engage with our suppliers to make them aware of the requirement to comply with our Sustainable Sourcing Policy, our main supplier policy which functions as our Supplier Code of Conduct. It requires suppliers to act responsibly and ethically, comply with labour standards and cascade expectations further up the supply chain. Suppliers must acknowledge and sign the policy before commencing trade and re-sign it at a minimum every three years. The policy also establishes Finlays' right to request information, conduct site visits and carry out audits to verify compliance.

The policy is applied through Finlays' Supplier Relationship Management (SRM) programme, supplier self-assessment questionnaires, audits, certification checks and risk-based engagement. Suppliers that do not meet Finlays' standards are not approved or onboarded, although where appropriate we work with suppliers to make required improvements, recognising the prevalence of smallholders and diverse supplier maturity levels in agricultural supply chains.

### **Finlays Code of Conduct**

Through Finlays' Code of Conduct, we emphasise that we are committed to conducting business with zero tolerance for unethical practices. We uphold high standards of responsible and ethical behaviour in our own operations and look for similar commitment in our business partners. Our Code of Conduct sets out our requirements on human rights, environmental and social impact, and the reporting channels available to report any breaches of our standards and policies or to raise concerns. The Code of Conduct is used and accessible to all employees globally via our internal Fintranet and sets out Finlays' expectations on our employee ethical behaviour. The Code is also available publicly and can be shared with external parties.

<sup>2</sup> The Ethical Trading Initiative is a leading alliance of companies, trade unions and non-governmental organisations that promotes respect for workers' rights around the globe. Finlays has been a corporate member of ETI since 2009.

## SPEAK-UP, GRIEVANCE AND ACCESS TO REMEDY

Finlays recognises that breaches of our policies and standards can cause significant harm to individuals, communities, and our business. Everyone has a responsibility to raise concerns, and we do not tolerate retaliation of any kind against anyone who raises a concern in good faith. We proactively promote a strong speak-up culture, reinforced through regular communications and training, to empower employees and business partners to do the right thing.

Finlays provides multiple channels to raise concerns about potential violations of Company policies, the law, or our Code of Conduct for employees and suppliers. Employees can report concerns through line managers, senior leadership, Human Resources, Corporate Affairs, Risk and Compliance, or Internal Audit functions.

During 2025, Finlays operated a whistleblowing channel, including an independent third-party mechanism accessible to employees, contractors, suppliers and workers in our supply chain, enabling concerns to be raised confidentially and anonymously. Following a review of this mechanism, Finlays has transitioned in 2026 to a new independent, third-party whistleblowing platform, Speak Up, which is empowered by EthicsPoint, a NAVEX system. This service is accessible to employees, contractors, and suppliers and workers in our supply chain.

All concerns raised are taken seriously and are assessed and investigated in a timely manner in line with our grievance and remediation procedures. Investigations are conducted in a fair, unbiased, and transparent manner, with appropriate oversight and without conflicts of interest. Where concerns are substantiated, Finlays is committed to ensuring appropriate remediation and access to remedy for affected individuals. In 2025, no confirmed cases of modern slavery or child labour were identified through these mechanisms. However, we understand the importance of strengthening our speak-up culture, due diligence and grievance mechanisms to support effective identification and remediation.

Where concerns relate to suppliers or business partners, Finlays takes a risk-based approach that can include requesting further information, requiring corrective action plans, undertaking enhanced due diligence, commissioning independent audits, and providing support for improvement. In cases where issues are severe, persistent, or cannot be effectively addressed, we may pause onboarding or disengage from the relationship.

During 2025, Finlays worked to clarify grievance processes across Business Units and continued to strengthen our global grievance and safeguarding framework. As part of our 2026 priorities, we will review and roll-out the updated global grievance mechanism, aligned with evolving best practice and regulatory expectations, such as the UN Guiding Principles on Business and Human Rights' effectiveness criteria, with improvements to case management and oversight.

### **Finlays Whistleblowing Policy**

Finlays' Whistleblowing Policy is designed to ensure that concerns relating to wrongdoing, malpractice, or human rights risks, including modern slavery, can be raised without fear of victimisation, retaliation, discrimination, or dismissal. Reports can be made through internal channels or via our independent whistleblowing mechanism in place during the reporting period. Finlays has since implemented Speak Up as its independent whistleblowing platform. This platform provides a secure and confidential route to report concerns anonymously via an online form or hotline available 24/7 in multiple languages. All reports received are appropriately triaged and investigated with governance oversight. Finlays is committed to protecting whistleblowers, maintaining confidentiality, and ensuring that all concerns are handled consistently, responsibly, and in line with applicable laws and international standards.

In 2026, we will be reviewing and relaunching our Whistleblowing Policy, to reflect the new independent whistleblowing mechanism and hotline.

## RISK ASSESSMENT

Modern slavery is managed as part of Finlays' broader HRDD approach. In 2024, Finlays completed its first group-wide Human Rights Risk Assessment (HRRRA), supported by external human rights specialists. The assessment used data analysis, risk tools, stakeholder interviews and saliency criteria, considering scale, scope and remedability of impacts. It identified forced labour and human trafficking, child labour, excessive working hours, livelihoods and wages, occupational health and safety, and gender inequality including gender-based violence and harassment (GBVH) as Finlays' salient human rights risks. These risks are considered across own operations and supply chains, with particular attention to temporary, agency, contractor, seasonal, migrant and informal workers.

In 2025, we used the HRRRA findings to inform Business Unit action planning and more detailed local assessments. An example is Finlay Beverages, which undertook cross-functional workshops and rights-holder engagement with on-site workers through a third-party provider to validate its salient human rights risks and refine its HRDD action plan. Another example is from MEAC, which established a cross-functional HRDD committee and identified priority risks including discrimination, excessive working hours, occupational health and safety, precarious employment and gender inequality.

In 2025, Finlays also conducted its annual supplier risk assessment, which brings together compliance, sustainability, quality, and regulatory risks. For sustainability, we calculate country of origin risks across key commodities and supplier categories and an overall sustainability risk score. This approach recognises that Finlays operates across complex and inherently higher risk agricultural supply chains, particularly in tea and coffee, where risks such as forced labour, child labour, and other human rights challenges can be more prevalent. The methodology combines external human rights and environmental indicators from Sedex, Fairtrade and Rainforest Alliance, with internal sourcing data to assess inherent contextual risk and prioritise enhanced due diligence. Country of Origin risk does not represent individual supplier performance, but it supports prioritisation for engagement, monitoring, and risk mitigation efforts particularly in higher risk geographies.

For green bean coffee, the 2025 assessment identified a number of high-risk countries of origin, including Colombia, Ethiopia, Guatemala, Honduras, India, Indonesia, Kenya, Laos, Malawi, Nicaragua, Papua New Guinea, Peru and Vietnam. For tea, Uganda was assessed as the highest risk country of origin, with additional high risk tea sourcing countries including Burundi, the Democratic Republic of Congo, India, Indonesia, Kenya, Malawi, Mozambique, Tanzania and Zimbabwe.

As our Supplier Relationship Management (SRM) programme expanded to direct materials and services in 2025, category and origin risk assessments also identified higher risks linked to some packaging suppliers in Kenya and ingredient suppliers in China and Kenya.

These insights enable Finlays to take a risk-based approach, focusing resources on the areas of greatest potential harm and strengthening due diligence, supplier engagement, and remediation efforts where they are most needed. During 2025, Finlays also began reviewing how to further strengthen and more consistently apply a risk-based approach to supplier due diligence. This has included internal discussions to assess current practices, identify gaps, and consider how best to align with evolving regulatory expectations and international best practice. In 2026, Finlays will undertake a more formal review of its approach, including consultation with key stakeholders, with the aim of implementing a more robust and effective risk-based framework for supplier due diligence and risk prioritisation.





## RISK MANAGEMENT - FOCUS AREAS

### OWN OPERATIONS

Our goal in our own operations is to embed a proactive approach to human rights, where our employees and managers have the knowledge, tools and confidence to identify and act on modern slavery risks and advance Finlays' human rights approach.

#### **Training and awareness**

Modern slavery, human rights and Code of Conduct training are mandatory for Finlays employees globally. Because annual modern slavery and human rights training had been completed at the end of 2024, the e-learning course was not re-triggered in 2025. In-person training covering modern slavery and human rights was delivered by the Head of Risk and Compliance in selected sites, including Dubai, Mombasa, Kericho, San Antonio and Rhode Island. Online annual Training for Modern Slavery and Human Rights will be re-triggered to all employees globally in 2026.

Business Units also continued local awareness activities. For example, Finlay Beverages incorporated modern slavery into induction and Stronger Together awareness training for new starters and agency workers, while Argentina included human rights, the Code of Conduct and grievance mechanisms in seasonal worker inductions.

#### **Temporary, agency and contractor workers**

Temporary, agency and contractor workers remain a priority group because employment arrangements may involve intermediaries, short-term work and lower direct visibility. In 2025, Finlays reduced temporary and contractor workers by approximately 10% across the business. We continued to strengthen oversight in higher-priority locations, including Colombo, Mombasa and the UK.

In the UK, Finlay Beverages undertakes due diligence and audits of employment agency providers every six months. These checks include review of worker documentation, contracts, payment records, agency licences and worker interviews. UK agency workers also receive modern slavery information during induction and periodic face-to-face checks are carried out to identify potential concerns.

#### **Towards a fair and living wage**

We recognise that fair and predictable pay is an important part of reducing vulnerability to labour exploitation, forced labour and supporting decent work. As part of Sustainable Future 2030, Finlays has committed to ensuring that all direct employees are paid a living wage by 2030. In 2025, we continued to strengthen the systems and governance needed to support this ambition, including embedding living wage considerations into decision-making, advancing action plans based on baseline assessments, and supporting local teams to develop context-specific approaches to closing gaps. By the end of 2025, 75% of direct employees were paid a living wage or above, up from an estimated 70% in 2024. Several businesses had already reached 100%, including Finlays Argentina and Finlays MEAC, while other businesses continued to progress against local action plans.

#### **Business Unit HRDD implementation**

In 2025, Finlays continued to support Business Units to translate the Head Office HRDD framework into local implementation, recognising that effective risk management requires alignment with operational realities and worker experience.

Finlay Beverages undertook an independent worker validation exercise, engaging 36 workers across a cross-section of roles, shift patterns, and employment types through interviews, focus groups, and training sessions. The objective was to assess whether identified salient human rights risks and the associated action plan accurately reflected workers' lived experiences and priorities. The validation confirmed that the majority of salient human rights risks at operational level had been appropriately identified, while highlighting areas requiring refinement. In particular, discrimination was elevated as the highest priority risk, and modern slavery risk was confirmed, with a need to strengthen due diligence on labour providers, improve worker awareness, and ensure accessible reporting channels. The exercise also identified broader systemic themes, including gaps in worker voice, communication, and awareness of grievance mechanisms, as well as the need to complement existing policies and training with more targeted and behaviour-focused interventions. These insights will be used to refine the Business Unit HRDD action plan and strengthen implementation in 2026. Recognising that the most severe human rights risks in the food and beverage sector are often located in supply chains, extending HRDD to suppliers also remains a key priority for the next phase of implementation.

In parallel, MEAC launched an HRDD project in 2025, establishing a cross-functional committee representing Commercial, Quality Control, Procurement, Production, Human Resources and Health & Safety. This work introduced a more structured approach to risk monitoring and resulted in the development of a three-year action plan for 2026–2028.

These examples demonstrate how HRDD is being locally implemented across Finlays while enabling Business Units to share learnings and best practices, strengthening our overall approach.

**Monitoring effectiveness**

Finlays recognises that its modern slavery reporting has historically focused more on activities than effectiveness. In 2025, we began strengthening the foundations for more systematic monitoring by developing the HRDD roadmap, Business Unit action plans and initial work on developing an impact measurement framework. This work will be further developed in 2026.

**Update on Browns Plantations Kenya (BPK) and Project Kulinda**

Finlays also continued engagement in relation to Browns Plantations Kenya (BPK), a major supplier. The programme, which responds to previously identified human rights and organisational development issues, focused in 2025 on consolidating improvements, completing actions and strengthening systems to ensure sustainability beyond the project period. Grievance mechanisms were strengthened and used more actively, with confidential third-party channels available to workers and outgrowers. Independent monitoring by Ethical Trade Services Africa continued through site visits, interviews and reporting, and the two-year project formally concluded in December 2025 with most actions closed and remaining activities being embedded into business-as-usual operations.



# SUPPLY CHAIN

Finlays sources agricultural raw materials through diversified global supply chains. Tea, green bean coffee and soluble coffee are sourced predominantly from Latin America, Africa and Asia. Depending on commodity and origin, these supply chains may include smallholder farmers, estates, cooperatives, exporters, traders, mills and third-party manufacturers. Finlays also uses direct materials and services suppliers, including ingredients, packaging, co-manufacturers, co-packers and logistics providers.

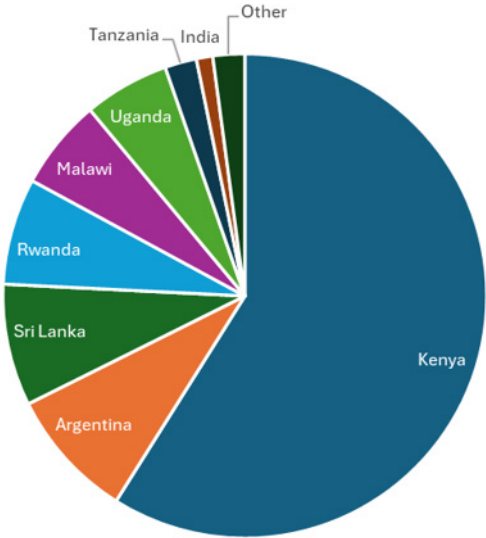
Our sourcing relationships include long-term partnerships, private contracts, cooperative relationships and auction or spot purchases. Spot market buying can support security of supply but may reduce traceability and leverage, so Finlays continues to prioritise approved suppliers, traceability to origin and risk-based engagement where we have the greatest potential influence.

Finlays supports supply chain transparency through the disclosure of first-tier supplier locations via the Open Supply Hub, which can be accessed [here](#). Detailed origin information is presented on the following sections by commodity.

## Tea Sourcing

We source green leaf from our own tea farm in Argentina and through farming cooperatives in Argentina, Sri Lanka and Kenya, and we source made tea from our own tea farm, private contracts with third-party suppliers and through Auctions. In 2025, around 80% of the total volume of tea purchased by Finlays was sourced from East and Southern Africa, with Kenya accounting for the largest proportion. Argentina and Sri Lanka were the next most significant countries of origin for Finlays' tea sourcing.

% volume of tea purchased in 2025 per origin



Country of origin	% volume
Kenya	58.9%
Argentina	8.7%
Sri Lanka	8.1%
Rwanda	7.1%
Malawi	6.1%
Uganda	5.7%
Tanzania	2.1%
India	1.1%
People's Republic of China	0.9%
Vietnam	0.7%
Indonesia	0.3%
South Africa	0.2%
Zimbabwe	0.1%
Burundi	<0.1%

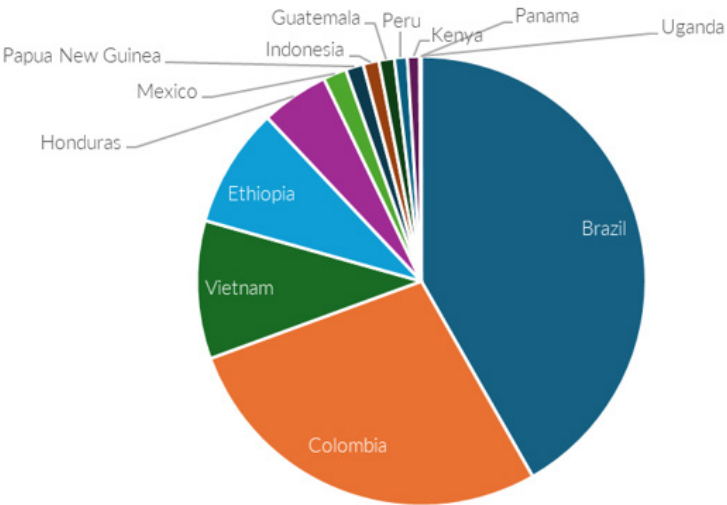
Note: Burundi is 0.02%



**Coffee Sourcing**

Finlays sources green bean coffee through private contracts with farmers, farming cooperatives and other suppliers. We have built long-standing relationships with many of our coffee suppliers, working with them over a number of years to support quality, traceability and responsible sourcing practices. In 2025, Brazil and Colombia together accounted for approximately 69% of the total volume of green bean coffee purchased by Finlays, reflecting their continued importance within our coffee supply chains.

% volume of green bean coffee purchased in 2025 per origin



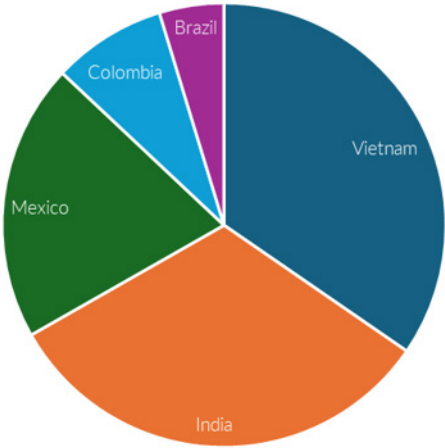
Country of origin	% volume
Brazil	41.7%
Colombia	27.7%
Vietnam	9.9%
Ethiopia	8.6%
Honduras	4.9%
Mexico	1.7%
Papua New Guinea	1.3%
Indonesia	1.1%
Guatemala	1.1%
Peru	0.9%
Kenya	0.9%
Panama	0.1%
Uganda	<0.1%

Note: Uganda is 0.01%



Finlays purchases soluble coffee directly from third-party manufacturers. At a minimum, we maintain traceability to the green bean coffee supplier used by the final manufacturer, and in many cases traceability extends further upstream to the mill level. We continue to work with suppliers to improve traceability where this is not yet available. For soluble coffee, our due diligence efforts focus primarily on the manufacturers themselves. As a result, we report the country of manufacture rather than the origin of individual coffee mills.

% volume of soluble coffee purchased in 2025 per country of manufacturing site



Country	% volume
Vietnam	34.6%
India	32.2%
Mexico	20.2%
Colombia	8.3%
Brazil	4.7%
<b>Grand Total</b>	<b>100%</b>



## Supply chain transparency

Transparency is critical to Finlays' approach to identifying and managing modern slavery and human rights risks in the supply chain. Understanding where products originate and maintaining visibility as they move through the supply chain enables Finlays to assess risk exposure, prioritise due diligence, and engage effectively with suppliers where risks are most likely to arise.

By the end of 2025, Finlays had achieved the following levels of traceability across its core commodities:

- 100% of made leaf tea was traceable to tea factory or garden mark
- 100% of green leaf tea used processed in Finlays' tea factories was traceable to the farmer
- 100% of soluble coffee was traceable to the green bean mill used by the manufacturer
- 99.4% of green bean coffee was traceable to producer group or mill

This traceability provides clear chain-of-custody visibility and supports Finlays' ability to communicate expectations, monitor compliance, and take action where issues are identified. The remaining 0.6% gap in green bean coffee traceability reflects limited spot market purchases and a small number of suppliers not yet fully aligned with Finlays' programme. Work is ongoing across procurement, sourcing, and supply chain teams to close this gap.

Certification also remains an important part of Finlays' responsible sourcing approach, providing independently verified standards and chain-of-custody assurance. Although it does not replace direct supplier engagement and risk-based HRDD, where possible, we prioritise sourcing from suppliers that are third-party certified, such as Rainforest Alliance and Fairtrade. These schemes establish minimum standards on human rights, including modern slavery, and require regular independent audits.

Many of Finlays' own sites are also certified to Rainforest Alliance and Fairtrade standards. In 2025, 75% of tea and coffee volume was certified by Rainforest Alliance or Fairtrade, up from 66% in 2024, explained by an increase in certified tea volumes.

## Supplier due diligence

Finlays' Supplier Risk Management (SRM) programme is designed to build transparent, responsible and resilient supplier partnerships. It brings together requirements on sustainability, quality, food safety, compliance and regulatory standards. As part of SRM, suppliers are first risk assessed and then segmented to identify those that are most strategic and where Finlays has greatest leverage, enabling prioritised engagement and performance management, with a stronger focus on sustainability and human rights risks. In 2025, SRM expanded beyond tea and coffee to direct materials and services, including ingredients and primary packaging, such as co-manufacturers and co-packers for our Finlays Solutions business, providing a broader and more integrated view of supply chain risk. While traceability and certification reporting currently remains more focused on core raw materials, this expansion marks an important step towards extending equivalent transparency, due diligence and reporting to co-manufacturers and co-packers in future reporting years.

In 2025, 100% of strategic suppliers were approved under SRM and 95% of tea and coffee volume was purchased from approved suppliers, up from 88% in 2024 and 59% in 2023. Supplier due diligence includes policy acknowledgement, supplier self-assessment questionnaires, certification review, desktop audits, site visits, corrective action planning and enhanced due diligence where risks are identified.

All in-scope suppliers complete desktop audits, including a Supplier Self-Assessment Questionnaire covering human rights including forced labour indicators and child labour, labour standards, freedom of association, health and safety, and environment. In 2025, our supplier due diligence processes, including supplier questionnaires and visits, identified several recurring sustainability and ethical risks. The most common issues were excessive overtime, weak or ineffective grievance mechanisms, lack of regular employment linked to high levels of temporary work, withholding of worker identity documents, and gaps in due diligence over labour providers and contractors. Several of these issues can be indicators of forced labour risk.



Where such risks or gaps are identified, Finlays applies a risk-based approach to follow-up. In 2025, we engaged directly with suppliers to address identified issues, required corrective action plans with defined timelines, and conducted follow-up reviews to monitor progress. For higher risk cases, we undertook enhanced due diligence and additional site visits, and where appropriate required independent ethical or human rights audits. We also required selected suppliers to strengthen transparency, including alignment with third-party platforms such as Sedex. Where issues remained unresolved, suppliers were subject to continued monitoring and ongoing engagement to drive improvement while maintaining visibility of risk.

We also rolled-out a new third-party risk management system in 2025, named Risk Rate NAVEX, that conducts screenings of in scope suppliers, which delivers continual monitoring of risks, including human rights, via adverse media. This tool helped strengthen our supply chain risk management and compliance approach. As a result, there were several cases flagged by the system. For instance, it flagged a reputational risk due to an ongoing court case involving a supplier relating to land rights in Brazil. In response, we engaged directly with the supplier, conducted enhanced due diligence, and continued to monitor the situation closely, maintaining the risk flag to ensure ongoing oversight.

### **Risk-based engagement case studies**

- 1. Ethical audits during onboarding** - In 2025, due diligence during onboarding of a new supplier identified serious ethical risks that breached Finlays' Human Rights and Sustainable Sourcing Policies. Onboarding was paused and a third-party ethical and human rights audit was required before any commercial engagement could proceed. This approach reflects Finlays' expectation that supplier risk assessments inform sourcing decisions.
- 2. Collaborative supplier visits** - During 2025, Finlays strengthened supplier management processes through practical engagement. In Sri Lanka, our teams undertook supplier visits and a two-day workshop to strengthen collaboration, review findings and align on a refreshed due-diligence approach. In East Africa, James Finlay Mombasa engaged suppliers through collaborative visits and audits in Kenya and Uganda, helping suppliers understand Finlays' sustainable sourcing requirements and improve supplier approval rates.
- 3. Adapting due diligence to local realities** - Finlays Colombo manages a large and geographically dispersed tea supplier base, making supplier management and oversight complex. In 2025, the team developed a Supplier Due Diligence Roadmap focused on three principles: clear minimum expectations covering legal, ethical, environmental and quality requirements, risk-based prioritisation of high-risk suppliers, and continuous improvement through practical engagement, such as supplier visits, audits, and capability-building. The approach integrates sustainability, quality and customer requirements while recognising the realities of a smallholder supply base and focusing on progressive and achievable improvements.

### **Cross-industry collaboration**

Finlays recognises that modern slavery risks are systemic and cannot be addressed by one company alone, and therefore actively participates in cross-industry initiatives. Finlays is a signatory to the UN Global Compact and a member of the Ethical Trading Initiative, while Finlay Beverages joined the ETP (formally Ethical Tea Partnership) in 2025 to support collaboration on human rights, livelihoods, inequality, deforestation and sustainable farming practices in tea supply chains. Finlays also uses industry platforms such as Sedex, Secaro (former Manufacture 2030), and EcoVadis to strengthen supplier transparency, share data, and benchmark sustainability performance.

# FORWARD LOOKING - FOCUS AREAS FOR 2026

In 2026, Finlays will focus on strengthening the maturity and consistency of its approach to modern slavery and HRDD across our own operations and supply chain, while laying the foundations for future impact measurement once the HRDD measurement framework is in place. Our priorities are organised across three themes:

## 1. Governance, policies, grievance mechanisms and capability

- Review and update global policies, including grievance, safeguarding and whistleblowing policies and procedures, to strengthen human rights commitments, case management, oversight and access to remedy.
- Roll out the replacement independent whistleblowing mechanism and hotline, ensuring the system is reflected in policy, communication and case management processes.
- Re-trigger modern slavery and human rights e-learning for all employees and deliver further in-person compliance training covering modern slavery for priority audiences, including the Global Executive team, operations teams in the US, UK and Kenya, and buying and procurement teams across Finlays.

## 2. Own operations and workforce risk

- Continue to embed HRDD roadmaps and action plans across Business Units, supported by HRDD champions and cross-functional ownership, and develop the HRDD impact measurement framework before setting formal modern slavery and HRDD targets or metrics.
- Continue to reduce modern slavery risks linked to agency, temporary and contractor labour, including comparing approaches across Business Units and strengthening oversight where the use of third-party labour is highest.
- Progress action plans relating to temporary and contractor workers in priority locations, including Colombo and Mombasa, and continue periodic checks and agency provider due diligence in the UK.
- Maintain progress towards Finlays' 2030 living wage commitment by supporting local action plans, governance and decision-making on fair and predictable pay.

## 3. Supply chain due diligence, responsible sourcing and integration

- Continue the formal rollout and implementation of the expanded SRM programme to direct materials and services, including ingredients, primary packaging, co-manufacturers and co-packers, with clearer supplier onboarding, risk assessment and due diligence expectations.
- Roll out the third-party compliance and risk management system to remaining Business Units and relevant newly integrated operations, and continue adverse media monitoring for in-scope third parties.
- Review and strengthen Finlays' risk-based approach to supply chain due diligence, including how supplier risk assessments, traceability data, certification, Sedex, supplier visits, audit outcomes and country-of-origin risk are used to prioritise action for higher risk suppliers and origins.
- Develop an ethical and sustainability audit framework, to be implemented through a phased approach across the global business, starting with Finlays Colombo in line with its Supplier Due Diligence Roadmap.
- Integrate Leahy-IFP into Finlays' responsible sourcing and HRDD approach during 2026, with a focus on supply chain risk mapping, supplier onboarding, risk assessment and proportionate due diligence for Leahy's supplier base.
- Provide compliance and ethical training to Leahy-IFP in Nevada and Illinois covering Finlays' global policies, procedures and best practices.

This statement was approved by the Finlays Managing Director on behalf of James Finlay Limited on 19.06.2026.



Managing Director, James Finlay Limited

