

# Modern Slavery and Human Rights Statement

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**We, SEEDVAL SRL, CUI R047792802, with registered office in Galați county, Galați municipality, str. Constantin Brâncoveanu nr. 5, Romania, are a trading company supplying sunflower seeds, sunflower kernels, flax seeds, chickpeas and sorghum, as well as other agricultural commodities, to food and feed manufacturers across Europe.**

## 1. Introduction

This statement is made voluntarily by SEEDVAL SRL (Galați, Romania, CUI 47792802). Although SEEDVAL SRL is below the size thresholds of mandatory transparency legislation such as the UK Modern Slavery Act 2015, we choose to issue this statement because our customers, and we ourselves, expect full transparency about how we identify and mitigate the risks of modern slavery, forced labour, human trafficking and child labour in our operations and supply chain. It serves as our risk mitigation plan and is reviewed and re-issued every year.

## 2. Our business and supply chain

We source from agricultural producers and trading companies principally in Romania, Moldova and Bulgaria, and we use third-party service providers for transport, storage, loading and, where required, fumigation. Our own workforce is small, office-based and directly employed under written contracts governed by Romanian law.

## 3. Our policies

Two documents set the standards for our operations and supply chain, and both are available on request and annexed to or referenced in our commercial contracts:

- the SEEDVAL SRL Labour and Human Rights Policy (v2), covering our own employees — freely chosen employment, no child labour, official wages and contributions, legal working hours, non-discrimination, freedom of association, health and safety, and an open grievance route to the CEO; and
- the SEEDVAL SRL Supplier Code of Conduct (v3), binding on our suppliers and their subcontractors — prohibiting forced, bonded, prison and trafficked labour and child labour; requiring official wages, legal working hours, non-discrimination, dignity at work and freedom of association; and extending to food safety, pesticides, packaging and ISCC sustainability requirements. Where the Code is annexed to or referenced in a contract, a serious or unremedied breach is a material breach of that contract.

## 4. Where we see the risks

We assess the risk of modern slavery in our own offices as low: our staff are directly employed, documented and paid officially. The most significant risks sit in our upstream supply chain, and we name them openly:

- seasonal and temporary agricultural labour at producing farms, particularly during harvest, where informal or undeclared work arrangements are more common in the region;
- labour conditions at first gathering points and storage facilities, including loading crews;
- outsourced transport, where drivers are employed by subcontractors rather than by our direct counterparties; and
- the use of undisclosed subcontracting, which can hide any of the above from view.

## 5. How we mitigate these risks

- Contractual protection: our standard contracts contain labour-ethics and compliance clauses binding both parties to official employment, full official salary payment, no undeclared work, no child or forced labour, non-discrimination and safe working conditions; the Supplier Code of Conduct is annexed to or referenced in supplier contracts, and every supplier signs its acknowledgment page.



- Subcontracting transparency: suppliers must disclose all subcontracting — including transport, storage, loading and fumigation — without being asked, before or at the latest upon first use, and remain fully responsible for their subcontractors' compliance with equivalent standards.
- Supplier visits and due diligence: we screen counterparties before contracting and carry out regular supplier visits; these include checks on subcontracting practices — which subcontractors are used, whether they have been disclosed, and how the supplier ensures their compliance.
- Grievance mechanism open to suppliers' workers: any worker in our supply chain may raise a concern — confidentially and, if preferred, anonymously, in their own language — directly with our CEO, by e-mail to [office@seedval.com](mailto:office@seedval.com) (marked "Attn: CEO — Grievance") or by post to SEEDVAL SRL, str. Constantin Brâncoveanu nr. 5, ap. B5, Galați 800058, Romania. Reports are acknowledged within 5 working days where the reporter can be contacted, and no one suffers retaliation for a report made in good faith. Suppliers must communicate this channel to their workers.
- Corrective action first, termination where necessary: where we find non-compliance, our preferred approach is agreed corrective action within a reasonable timeframe; serious or unremedied violations lead to suspension or termination of the business relationship.

## 6. Responsibility and awareness

Daniela Plesca, CEO, is personally responsible for this risk mitigation plan, receives all grievance reports directly, and approves the annual review of this statement. All SEEDVAL SRL staff involved in purchasing and logistics are made aware of the risk areas described above and of the duty to escalate any concern to the CEO immediately.

## 7. How we measure progress

We track, and review annually: the share of active suppliers with a signed Supplier Code acknowledgment; the supplier visits carried out and whether subcontracting was reviewed at each; the completeness of subcontractor disclosures; and the number and resolution of grievance reports received. The results inform the annual update of this statement.

## 8. Review and publication

This statement is reviewed and re-issued annually, and earlier if our operations, supply chain or the applicable legislation change significantly. It is provided to any customer or supplier on request, is communicated to our suppliers together with the Supplier Code of Conduct, and we intend to make it publicly available on our website.

**Approved by: Daniela Plesca, Chief Executive Officer**  
Date: 03.08.2026    Signature: \_\_\_\_\_

