

## **Schlüter & Maack GmbH, Hamburg**

### **Bill S-211 Report for the Business Year 2024/25 (Oct 1, 2024 – Sept. 30, 2025)**

#### **(a) Structure, activities and supply chain:**

Schlüter & Maack GmbH was founded in 1820 and is a 6<sup>th</sup> generation family-owned trading operation. We supply safe ingredients to the food industry and work with audited partners in key producing countries around the world. Schlüter and Maack does not engage in any B2C-business.

We are active in the following commodities:

- Mustard Seeds
- Mustard Flours
- Dried Pulses (Lentils and Chickpeas)
- White crystal sugar

Schlüter & Maack has facilities in Balgonie/SK/Canada (mustard seeds), Hamburg/Germany (mustard seeds and pulses) and Kroppenstedt/Germany (mustard flours). All facilities are audited according to high level food standards such as ISO 22000, FSSC 22000 or Canadian-HACCP.

Mustard Seeds are sourced from Canada mainly based on production contracts with local farmers and from Eastern Europe (Ukraine and Russia) from long-term partners who are either producers or exporters.

Pulses are sourced mainly from North America and Eastern Europe (Ukraine / Russia) mainly from exporters.

#### **(b) Policies and due Diligence process in relation to forced labour and child labour / Risk Analysis:**

Approximately 80% of our sourced volume originates from North America and the European Union (including Switzerland and the UK). These jurisdictions have strong national legislation against forced and child labour and are classified as low risk by both the UNICEF Global Child Labour Database (June 2025) and the Walk Free Global Slavery Index 2023.

Approximately 17% originates from countries classified as high risk by the Walk Free Global Slavery Index 2023 (prevalence above 10 per 1,000): Ukraine and Russia, Kazakhstan, and Turkey. Forced and child labour are prohibited by national legislation in all four countries. The UNICEF Global Child Labour Database (June 2025) reports child labour prevalence of 2.2% for Ukraine (MICS 2012), 5.6% for Turkey (Türkiye Child Survey 2022), and no representative data for Russia or Kazakhstan.

Schlüter & Maack does not source from countries identified as highest prevalence by the Walk Free Global Slavery Index 2023 (such as North Korea, Eritrea, Mauritania, parts of Sub-Saharan Africa) or with documented highest child labour prevalence in the UNICEF Global Child Labour Database (such as parts of South Asia including India) for our product categories.

The remaining volume is distributed across various smaller-volume origin countries, each below 1% of total sourced volume.

For all sourcing from high-risk countries we apply enhanced due diligence: signed Code of Conduct with all suppliers, regular SMETA 4-pillar audits at our processing facilities, supplier verification that operations are located outside conflict-affected or sanctioned territories, and ongoing engagement through industry bodies such as the Global Pulses Confederation.

Schlüter & Maack has signed a code-of-conduct available on our website ([www.schlueter-maack.de](http://www.schlueter-maack.de)) which contains the exclusion of forced a/or child-labour in our supply chain. We are registered on the SEDEX-platform ([www.sedex.com](http://www.sedex.com)) and have been regularly audited according to the SMETA 4-pillar audit since over 10 years.

Our values can be found under the “What we stand for” section on our website.

Through our close contact with business partners and membership in industry organizations such as the Global Pulses Confederation ([www.gpc.org](http://www.gpc.org)) and others we keep ourselves up to date on changes related to forced and/or child labour in our supply chain.

**(c) Parts of the business and supply chain that carry a risk of forced labour being used and the step taken to eliminate the use of forced labour:**

We have identified sourcing from Ukraine, Russia, Kazakhstan, and Turkey (cumulative approx. 17% of sourced volumes) as the part of our supply chain carrying elevated risk, as described in section (b) above. Our enhanced due diligence measures (Code of Conduct, SMETA audits, territorial verification, industry engagement) directly address these risks. No instances of forced or child labour have been identified through these measures during the reporting period.

**(d) Measures taken to eliminate any forced or child labour:**

Schlüter & Maack has not identified any instances of forced labour or child labour in its own operations or supply chain during the reporting period. This assessment is based on our supplier due diligence (signed Code of Conduct, SMETA 4-pillar audits, ongoing supplier engagement) and the absence of any reports through our communication channels with suppliers, employees, or industry partners. As no such instances were identified, no remediation measures under section 11(1)(d) were required during the reporting period. Should evidence of forced or child labour emerge in our supply chain in the future, we would engage directly with the supplier to address the situation, escalate to termination of the business relationship if not remediated, and document the case in subsequent reports.

**(e) Measures taken to remediate the loss of income to the vulnerable families that result from any measure taken to eliminate the use of forced or child labour in our activities and supply chains:**

No measures taken to eliminate forced or child labour have caused loss of income to vulnerable families. Therefore, no remediation measures under section 11(1)(e) were required during the reporting period

**(f) Training provided to employees on forced labour and child labour:**

Any ESG topics within our organisation are taken care of by the top management. Employees are regularly trained about our values as part of the onboarding process and continues training. No specific activities related to forced a/o child labour deemed necessary in our organisation.

**(g) Measurement of our effectiveness in ensuring that forced a/o child labour are not being used in our business and supply chains:**

As our operations take place within the legislation of Canada and Germany we deem that legal framework sufficient to eliminate any potential forced a/o child labour.




Our SMETA 4-pillar certification ensures external control of our business practices and supply-chains.

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. I have the authority to bind Schlüter & Maack GmbH.

This report was approved by the governing body of Schlüter & Maack GmbH on May 27, 2026, pursuant to subparagraph 11(4)(a) of the Act.

This report can be found on our website too.

**Schlüter & Maack GmbH**

Richard Schlüter (Managing Partner)

Michael Kemperdick (Managing Director)