

Modern Slavery Statement



Introduction

Modern slavery and human trafficking are abhorrent practices which unfortunately still exist around the globe. Upfield Foods UK Limited (“**Upfield**”) is part of the largest plant-based consumer product company in the world and as a market leader in many territories, with Upfield products being sold in 95 countries worldwide, we understand that it is our duty to set an example in relation to modern slavery and human trafficking, instil the core Upfield values of Performance, Passion and Care in everything we do and encourage others to do the same. This is our second statement on our efforts to prevent modern slavery and human trafficking in line with section 54 of Part 6 of the Modern Slavery Act 2015 and details the steps taken by Upfield to prevent modern slavery and human trafficking throughout our business operations and supply chains in respect of the financial year ending 31 December 2021.

About Upfield

We are the #1 producer of plant-based spreads globally, with iconic brands FLORA, RAMA, BLUE BAND, PROACTIV, BECEL, and COUNTRY CROCK. Superior taste and quality are the standard we set for all our products and since 1871, we have been the authority in the spreads category which gives us unmatched experience, know-how and inspiration to deliver on our mission to create “a Better Plant-Based Future.” To deliver on this mission, numerous steps have been taken to mitigate the possibility of slavery and human trafficking occurring in our business and supply chains and this statement sets out the progress made following on from our previous statement published in March 2019.

Upfield is a wholly owned subsidiary of Upfield Group B.V., which is headquartered in the Netherlands. The Upfield Group manufactures and sells products in over 95 countries and employs over 4,200 people worldwide. We work with suppliers all over the world from whom we source our ingredients and raw and packaging materials to manufacture and sell our products.

We are committed to a corporate social responsibility that fosters a culture with respect for dignity and human rights as well as for high ethical standards in the conduct of our business. We are resolved to prevent acts of modern slavery and human trafficking from occurring within our business and supply chains and impose these same standards on our suppliers.

This Statement sets out the actions that Upfield has taken this year to evaluate and understand potential modern slavery risks relating to our business and our supply chains as well as measures which are currently in place and any enhancements required to mitigate the possibility of slavery and human trafficking occurring in our business and supply chains.

We have continued our process of developing and implementing various compliance and supplier assurance processes. The growth of the Upfield legal and compliance departments means these processes of risk identification and assessment, mandatory training and guidance for all employees, global incident reporting and other various internal policies have been finalised and are constantly being communicated to Upfield associates.

What have we done since March 2019?

Internally we have processes and procedures in place to ensure we operate with integrity. When it comes to our suppliers, which vary from small to large multinational companies located across six continents, this requires significant effort to manage legal and operational compliance, health and sustainability, as well as ethical issues. Although ultimately it is each supplier's responsibility to respect human rights, Upfield seeks to play an active role in ensuring that such responsibility is acted upon in accordance with our standards. To date, we have concentrated on spending time working on key internal policies to ensure business is conducted generally in an ethical and transparent ways. Our internal policies include:

1. **Code of Business Principles:** from the inception of Upfield in July 2018, we have maintained and communicated our Code of Business Principles to employees and suppliers alike. Combining a range of policies on the most significant business risk areas, our Code is at the heart of all we do and sets out our approach in relation to:
 - Respecting People;
 - Engaging Externally;
 - Countering Corruption; and
 - Safeguarding Information

All employees joining Upfield are asked to review and confirm compliance with our Code and a link is maintained in our standard contracts with new external third parties, so they all know the standards with which we require they comply.

2. **Recruitment Policy:** Upfield operates a robust recruitment policy for its employees and other agency workers, including conducting eligibility to work in the UK checks for all employees and agency workers, to safeguard against human trafficking or individuals being forced to work against their will.
3. **SpeakUp:** We have set up a SpeakUp helpline available to internal employees and external stakeholders giving them the opportunity to report any non-compliance incidents against our Code of Business Principles. Upfield aims to always support a culture where colleagues are treated fairly and with respect and have an outlet where business practices can be reported, without fear of reprisals. All reports made are investigated and addressed at a senior level.

Throughout 2019 and 2020, Upfield have a range of activities planned to further demonstrate its commitment to reduce the risk of Modern Slavery.

1. **Commitment to Human Rights**

Upfield has an ongoing commitment to uphold Human Rights for our Associates and third parties we engage with. Our Human Rights statement was published in 2019 setting out Upfield's commitment in this area and we are continuing to develop it and apply its principles where necessary in our business. Employees frequently receive training on it and it is the fundamental basis of how we engage both internally and externally.

- 2 **Suppliers**

As part of our efforts to monitor and reduce the risk of modern slavery and human trafficking within our supply chains, we have been adopting the following due diligence procedures throughout both 2018 and 2019. These are currently engaged when the supplier is onboarded, and regular monitoring is also carried out through the supply lifecycle.

- A. **Supplier Code of Conduct:** The publication of the Upfield Supplier Code of Conduct in 2019 was a big step for Upfield and we will continue to roll this out to make sure all suppliers comply with our values. This is read in parallel with our Code of Business Principles and deals specifically with the requirements of the Modern Slavery Act 2015. It contains the fundamental principles we expect from both direct and indirect suppliers to the Upfield Group and the minimum legal and ethical requirements they need to meet. These obligations will require our suppliers to prevent occurrences of modern slavery in their business and their supply chains. Compliance with this Supplier Code of Conduct is mandatory for all of our suppliers and is a core requirement in our standard terms of business.
- B. **Upfield Third Party Due Diligence Policy:** Ahead of working with each new third-party supplier and other business partners, we have introduced a due diligence review and multi-level screening process. The screening process consists of the following key elements:
- Supplier self-evaluation questionnaire;
 - Professional review of 4000+ global databases via third party Exiger plus manual, in-depth research on specific risks identified and linked to a prospective business partner; and
 - Supplier audits and certification program.

The Due Diligence process is managed and monitored by operational risk owners in close cooperation with global, regional, and local compliance officers.

3 Training

To ensure that all Upfield staff understand and are aware of the risks of modern slavery and human trafficking and can actively assist in its detection and prevention, a global programme of training is to be rolled out to representatives of Upfield's management teams, CSR teams, procurement teams and supply chain teams throughout 2021. This will be done using various e-learning platforms that interactively teach and test Upfield associates on the key principles outlined in this statement, with the training and assessment both being mandatory.

Upfield recognises the importance of maintaining constant vigilance to identify and address risks of slavery and human trafficking in its own business and that of its supply chains. In recognition of this, we remain committed to continue to uphold human rights and safety in our supply chains and will be reviewing the progress and effectiveness of our programmes in combatting slavery and human trafficking on an annual basis and shall report on our progress as we continue in our journey next year.

2021 and Beyond

Throughout 2020, the COVID-19 pandemic has highlighted the need for communities to come together to protect the most vulnerable in our society. Upfield's priorities throughout the last few months have been to keep all Associates and consumers safe and supporting the communities we both serve and source from. We will continue this commitment and duty to respect human rights and the prevention of modern slavery throughout 2020 and 2021.

This Statement has been approved by Upfield's Compliance Committee. June 2021