

May 2023



Modern Slavery Statement



Introduction

Upfield Foods UK Limited (“**Upfield**”) is part of the largest plant-based consumer product company in the world and is a market leader in many territories. We recognise that we have a responsibility to identify and prevent risks of slavery and human trafficking. This is in line with core Upfield values of Performance, Passion, and Care in everything we do, and we encourage others to do the same. This is our third Modern Slavery Statement in line with section 54 of Part 6 of the Modern Slavery Act 2015, and it details the steps taken by Upfield to prevent slavery and human trafficking throughout our business operations and supply chains in respect of the financial year ending 31 December 2022.

About Upfield

We are the #1 producer of plant-based spreads globally and other plant-based consumer products, with power brands Flora, Becel/ProActiv, Rama, Country Crock, BlueBand and Violife. Superior taste and quality are the standards we have set for all our products since 1871. We have been the spread category’s authority, giving us unmatched experience, know-how and inspiration to deliver on our mission to create “a Better Plant-Based Future.”

Upfield is a wholly owned subsidiary of Upfield Group B.V., headquartered in the Netherlands. The Upfield Group manufactures and sell products worldwide and employs over 4,800 people. We work with suppliers around the world from whom we source our ingredients and raw and packaging materials to manufacture and sell our products.

We are committed to implementing good business practices, including fostering a culture with respect for human rights and high ethical standards. To deliver on this commitment, a number of steps have been taken to identify, prevent and mitigate potential risks of slavery and human trafficking that might occur in our business and supply chains.

This Statement sets out the actions that Upfield has taken this year to evaluate, understand and mitigate potential slavery and human trafficking risks relating to our business and our supply chains. It also highlights the measures currently in place and any enhancements required to address and eliminate the possibility of slavery and human trafficking occurring in our business and supply chains.

What have we done since our last report?

We have continued developing and implementing various compliance and supplier due diligence processes to set out the company’s commitment to respecting human rights and outlining the company’s requirements towards third parties. This strategy has involved human rights risk identification and assessment with a relevant focus on preventing slavery and human trafficking, mandatory training and guidance for all employees and launching global incident reporting and other internal policies, which have been communicated to Upfield’s key stakeholders.

When it comes to our suppliers, which vary from small to large multinational companies located across six continents, operating with integrity requires significant effort to manage legal, operational and policy compliance. Upfield seeks to play an active role in ensuring suppliers adhere to our standards.

For that purpose, key policies, and a due diligence process for Upfield's employees and suppliers are in place to set out Upfield's commitment to respecting human rights and outlining its requirements towards third parties.

From a governance perspective, Upfield is committed to the prevention and mitigation of slavery and human trafficking in our operations and supply chain through the implementation of:

- 1. Upfield Code of Conduct:** from the inception of Upfield in July 2018, we have maintained and communicated our Code of Conduct 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

The Code contains a Human Rights chapter that covers how we aim to respect and promote human rights, including the prevention of slavery and human trafficking, in our own operations, with our varied network of partners and in the communities in which we operate.

All employees joining Upfield are asked to review and confirm compliance with our Code of Conduct and a link is maintained in our standard contractual terms and conditions with external third parties, so they all know our standards are mandatory and that they must agree to adhere to them in order to work with Upfield. We also ensure regular training on this Code of Conduct to build awareness and ensure employee adherence.

- 2. Human Rights Statement:** In accordance with the United Nations Guiding Principles on Business and Human Rights and the UN Global Compact Ten Principles, in 2019, the company issued the Human Rights Statement. Through this Statement, Upfield established its commitment to protecting and promoting human rights in the development of its operations.

The Human Rights Statement underlines Upfield's zero-tolerance approach to child, forced or compulsory labour. It also establishes an obligation for employees to acknowledge the Statement's content through annual training. Also, the Statement affirms its mandatory nature for suppliers in the framework of their commercial relationships with Upfield.

- 3. Responsible Sourcing Policy (RSP):** In October 2022, Upfield reviewed and approved the updated Responsible Sourcing Policy, which affirms the principles that must guide our suppliers' operations based on respecting human rights, international labour standards, including the prohibition of slavery and human trafficking.

Suppliers must meet all the criteria defined in the Responsible Sourcing Policy and report any breach of this specific policy.

- 4. Key commodity Policies:** Upfield has identified potential salient human rights risks in key commodity supply chains through a permanent due diligence process. To mitigate those risks, including slavery and human trafficking, Upfield has issued policies to ensure suppliers comply with specific standards for sourcing palm oil, soy, shea, coconut, and pulp & paper.

The mentioned policies include dispositions about the suppliers' obligation to ensure the compliance with the Human Rights Statement and the Responsible Sourcing Policy to guarantee respect and promotion of human rights, the improvement of employees' working conditions and the compliance of environmental standards in their operations.

- 5. Recruitment Policy:** Upfield operates a robust recruitment process in line with company guidelines for its employees and other agency workers, including conducting eligibility to work for all employees and agency workers to safeguard against human trafficking or individuals being forced to work against their will.

Throughout 2022, Upfield implemented a range of activities to further demonstrate its commitment to reducing the risk of slavery and human trafficking.

- 1. Speak Up:** The already existing Speak Up helpline has been reviewed against local legislation, implementing the 2019 EU Whistleblower Directive. In addition, we have communicated widely within the organisation the existence and importance of the Speak Up helpline, allowing employees and external stakeholders to report any non-compliance incidents against our Code of Conduct.

Upfield aims to always support a culture where people 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 within the Compliance Committee. The Compliance Committee includes members of Upfield's Executive Committee and Internal Audit leadership. The Chief Compliance Officer chairs the Committee.

- 2. Upfield Third Party Due Diligence Process:** Ahead of working with each new third-party supplier and other business partners, a due diligence review and multi-level screening process is being conducted. The screening process consists of the following key elements:
 - Supplier self-evaluation questionnaire.
 - Professional review of 4000+ global databases via third-party plus manual, in-depth research on specific risks identified and linked to a prospective business partner; and
 - Supplier audits and certification program through implementing various Sedex tools, including external SMETA audits.
 - Sustainability certification standards on key commodities to ensure responsible sourcing in our supply chain, like the Roundtable on Sustainable Palm Oil certification.

We use our ethical sourcing assessment programme to determine and prioritise areas and types of suppliers at risk of child, forced or compulsory labour practices. We then use a variety of mechanisms to mitigate these risks, including engaging with suppliers in particular regions, collecting and evaluating data from these suppliers, and working together to implement corrective actions where appropriate.

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

3. Own Operations

We have completed independent ethical audits (using SMETA methodology, which is the world's most widely used social audit, enabling businesses to assess their sites and suppliers to understand working conditions in their supply chain) for 11 out of our 14 factories, as part of our ongoing operational due diligence. This program will continue in 2023 and will include new factories.

4. Training

In 2022 a Human Rights module was included in our Code of Conduct e-learning. We aim to ensure that all Upfield staff understand and are aware of the risks of slavery and human trafficking and can actively assist in its detection and prevention.

We also provide specific and specialised training by role, depending on the responsibilities and risks associated with each employee. For instance, we have developed narrowed training for employees that must know about human rights matters in order to maintain our Roundtable Sustainable on Palm Oil Certification (RSPO).

2022 and Beyond

Upfield recognises the importance of maintaining constant vigilance to identify and address risks of slavery and human trafficking in its own business and its supply chains. Recognising this, we remain committed to upholding human rights and safety in our operations and supply chains. We will be reviewing the progress and effectiveness of our programmes in combatting slavery and human trafficking annually and shall report on our progress as we continue in our journey. We will maintain our commitment and duty to respect human rights and prevent slavery and human trafficking throughout 2022 and beyond.

For that purpose, in 2022, Upfield engaged with external experts, including a specialist Business and Human Rights consultancy firm, to carry out a strategic Human Rights Gap Assessment and develop a roadmap to support continuous improvement. During 2023 and 2024, Upfield will focus on implementing this roadmap.

The implementation of this roadmap will cover a range of actions focused on documenting and enhancing the process that Upfield has established for identifying and mitigating human rights risks, including the prevention of slavery and human trafficking.

Governance

This Statement has been approved by Upfield's Compliance Committee and by Upfield Foods UK Limited Board. May 2023.