

Modern Slavery Statement

June 2025 | Version 2.0



Introduction

At Flora Food Group B.V. (“**Flora Food Group**”) we recognise that we have a responsibility to respect Human Rights and, in that regard, we have a duty to identify and prevent the risks of slavery and human trafficking in our operations and supply chain. This is in line with our [Human Rights Policy](#), as well as Flora Food Group’s core values of Performance, Passion, and Care in everything we do, and we encourage others to do the same. This is our fifth Modern Slavery Statement in line with relevant international regulations, and it details the steps taken by the Flora Food Group to prevent slavery and human trafficking throughout our business operations and supply chains in respect of the financial year ending 31st December 2024.

About Flora Food Group

We are committed to delivering sustainable, long-term growth that contributes to nourishing food, thriving people, and a flourishing planet. Our unique combination of iconic brands, well-invested infrastructure, industry-leading research and development (R&D) expertise and people-driven culture enables us to deliver for customers and drive growth through exceptional products, strengthen our brands, execute across multiple channels, and strategically leverage our scale in a rapidly evolving global food system.

Headquartered in the Netherlands, Flora Food Group manufactures and sells products worldwide and employs over 4,700 people. We work with suppliers worldwide from whom we source our ingredients, raw materials, and packaging materials.

We are committed to implementing good business practices, including respecting and promoting human rights and high ethical standards. To deliver this, several steps have been taken to identify, prevent and mitigate potential risks of slavery and human trafficking that might occur in our operations and supply chains.

This Statement sets out the actions that Flora Food Group 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?

Following relevant international regulations, in 2024, we finalised the latest revision of our Double Materiality Assessment (DMA). The assessment reviewed sustainability-related impacts from our operations and value chain, and sustainability-related risks and opportunities. Where possible, we quantified the effects and supplemented these with qualitative assessments. The DMA, identifies and classifies our Impacts, Risks and Opportunities (IROs) into 10 core themes, aligned with the three pillars of our Sustainability Framework and governance structure. Specifically, human and labour rights were identified as a material risk for Flora Food Group.

Human and Labour Rights

Based on the DMA and the 2023 Human Rights Risk Assessment, we identified that the material risk focuses on forced labour practices and unfair labour conditions for our high-risk ingredients, particularly in the palm oil supply chain.

The identification of forced labour practices and unfair labour conditions as a risk in our palm oil supply chain has not been an isolated process. Instead, our Human Rights Due Diligence process, which has a risk-based approach, has allowed us to identify, prioritise, mitigate, monitor, and communicate forced labour and unfair working conditions as a salient human rights issue in our supply chain. Consequently, Flora Food Group has established a comprehensive approach to combat forced labour and unfair working conditions, as follows:

- **Embedding Human Rights**

Respecting and promoting human rights are non-negotiable to Flora Food Group. This is reflected in our Human Rights Policy, which covers our commitments, principles and approach, including the Zero-Tolerance of all forms of forced labour and human trafficking.

In addition, requirements relating to human rights and our Principle of Zero-Tolerance of all forms of forced labour and human trafficking are incorporated in the relevant sourcing and Human Resources policies, including, but not limited to, our Code of Conduct, Business Partner Code of Conduct, Responsible Sourcing Policy and ingredient-specific policies for high-risk ingredients.

In 2024, we provide training on human rights as part of teaching on the Code of Business Conduct, for all employees, and focused functional training, as appropriate. The training includes a focus on Flora Food Group's core policies including the Human Rights Policy and its Zero Tolerance of all forms of forced labour and human trafficking principle.

To make sure everyone at Flora Food Group understands what our standards require, we set a target that 100% of employees complete our Code of Conduct training. In 2024, 99.5% completed the training.

- **Contractual requirements and supply chain due diligence**

We deploy human rights requirements in our contracts and due diligence processes, as needed. Particularly, in 2024 we conducted social and environmental due diligence on our suppliers. This included Sedex self-assessment questionnaire (SAQ) to screen risks and evaluate social performance. Social aspects cover human rights and emphasize labour rights, to mitigate the risk of forced labour practices and unfair labour conditions.

Additionally, as part of our due diligence processes, we require independent ethical audits for our manufacturing sites, third-party manufacturers and high-risk suppliers (based on spend). We primarily use Sedex Members Ethical Trade Audits (SMETA).

By the end of 2024, 87% of our in-scope suppliers have completed an SAQ. This is an increase from the 2021 baseline of 27%. We continue to work towards ensuring all suppliers meet this requirement.

As part of the SAQ, the Sedex platform collects the necessary information to give each supplier a risk score (Sedex risk score). Where a Sedex risk score is high, we work with the supplier (a high-risk supplier) to ensure they meet our requirements and use SMETA to provide further assurance.

At the end of 2024, 56% of our high-risk suppliers have completed a SMETA audit. In addition, 28% of these suppliers are in the process of completing their audits, therefore we anticipate achieving 84% completion soon.

Furthermore, we use a range of certifications for our high-risk ingredients. Considering that our human rights salient issue focuses on forced labour practices and unfair working conditions in the palm oil supply chain, we focus on certification for this commodity and use the best available industry standards. Therefore, in 2024, 100% of the palm oil we purchased had RSPO certification (Segregated or Mass Balance).

- **Complaints and grievances**

In 2024, we maintained robust processes for the management of human rights related complaints and grievances. This comprises the Speak Up Line, which is available for all employees and external stakeholders, and a robust grievance mechanism which is reviewed by Flora Food Group's Grievance Committee.

Our [Grievance Tracker](#) include the grievance cases directed towards Flora Food Group, and priority issues with implications for Flora Food Group's supply chain, including potential human rights violations, as identified through our regular monitoring activities.

- **Partnerships**

We recognise that collaboration across shared worldwide supply chains is critical. In 2024, we partnered with different NGOs and specialist advisors to better understand complex human rights issues. We collaborate with peers, customers, suppliers and NGOs to develop solutions to common supply chain concerns.

Particularly, we are part of the Human Rights Coalition of the Consumer Good Forum and within this framework we are part of the Palm Oil Working Group, which focuses on enhancing human rights due diligence within this specific commodity supply chain through the development of best practices for companies aiming to improve their strategies on respect human rights. In forced labour and fair working conditions, the Coalition has partnered with the Fair Labor Association (FLA) and the International Organization for Migration (IOM) to improve the capacity of suppliers and recruitment agencies with responsible recruitment best practices.

Furthermore, in 2024, Flora Food Group contributed about 2.5% of the total budget of an Earthworm Foundation project in Malaysia's Southern Central Forest Spine (SCFS) to help palm plantations protect nature and promote good labour practices. The programme has reached about 1,300 farmers and supported them to implement good agricultural practices and meet sustainability requirements, in line with Malaysian palm oil standards. A total of 8,395 workers out have been engaged and impacted directly and indirectly since 2021, towards the target of 18,000.

2025 and Beyond

Flora Food Group 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 will maintain our commitment and duty to respect human rights and prevent slavery and human trafficking throughout 2025 and beyond.

More concretely, in 2025 we will be updating our human rights risk assessment, we will defined impact key performance indicators so we can trace the effectiveness of our system, and we will document all our human rights due diligence process.

Approval

This Statement is aligned with Flora Food Group Annual Report which was approved by the Flora Food Group B.V. CEO.

Additionally, this Statement, was approved by Flora Food Group Compliance Committee. June 2025.

The UK subsidiaries of Flora Food Group that are subject to the UK Modern Slavery Act (Flora Food Sales UK Limited, Flora Food GEC Limited, Flora Food Management UK Limited and Flora Food Holding UK Limited) adopt this group statement as their Modern Slavery Statement for the financial year ending 31st December 2024 and the board of directors of each of these UK companies has approved this statement.