

Nutrition Policy

SUS 9

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1. Purpose

At Flora Food Group, our purpose is to deliver the next generation of delicious, natural, nutritious food; more affordable, more sustainable. Our iconic brands offer consumers choice in four vast and different growing categories: butters and spreads, creams, culinary and cheeses. This drives positive change in people's health, their daily lives and our planet's sustainability. Our products taste and perform as well as the conventional dairy counterparts, but have benefits as regards human health and environment.

We aim to create delicious and nutritious food for healthy, sustainable diets by innovating the next generation of delicious food, made with natural ingredients, offering consumers a compelling choice with essential nutrition to support healthy, balanced diets. We ensure food quality and safety by maintaining high standards of product quality, safety and transparency.

2. Definitions

Healthy:

Flora Food Group recognises the [FAO/WHO definition for 'Sustainable Healthy Diets'](#) to identify what foods can be considered healthy. These promote all dimensions of individuals' health and wellbeing, have low environmental pressure and impact, are accessible, affordable and equitable, and are culturally acceptable. In practice this means shifting away from saturated fats towards more unsaturated fats, and reduction of trans fat intake from all sources to less than 1% of energy intake, limited levels of sugars, and limited levels of salt.

Nutritious:

'Nutritious' at Flora Food Group refers to: products that will always be better than the conventional dairy counterparts on saturated fat and trans-fat; products with added or limited nutrients where this matters to consumers, in line with product propositions; and fortification which is scientifically justified and intended to improve or maintain health.

Malnutrition:

Malnutrition refers, according to the World Health Organization, to deficiencies, excesses, or imbalances in a person's intake of energy and/or nutrients. The term malnutrition addresses 3 broad groups of conditions:

- undernutrition, which includes wasting (low weight-for-height), stunting (low height-for-age) and underweight (low weight-for-age);
- micronutrient-related malnutrition, which includes micronutrient deficiencies (a lack of important vitamins and minerals) or micronutrient excess; and
- overweight, obesity and diet-related noncommunicable diseases (NCDs) (such as heart disease, stroke, diabetes and some cancers).

3. Scope

Our Nutrition Policy describes the actions that we are taking to deliver against our 'Nourishing Food' pillar of our Sustainability Framework. With our Nutrition Policy we show how we contribute to the United Nations Sustainable Development Goals (2) Zero Hunger, (3) Good Health and Well-being, and (17) Partnerships for the Goals. Our policy is based on the principles and ambitions of

[WHO Global Action Plan for the prevention and control of noncommunicable diseases 2013- 2030](#) and how we will play our part in achieving this. Furthermore, we have also achieved the aims of the [WHO REPLACE](#) Programme (trans fats) by eliminating the use of partially hydrogenated vegetable oils from our portfolio across all markets (more than ten years ago). We contribute to achieving these important objectives through our products, through education and communication, through collaboration in scientific research and by ensuring that our programmes are all based on the best available science.

4. Nourishing Food

The 'Nourishing Food' pillar of our Sustainability Framework aims to create delicious and nutritious food for healthy, sustainable diets and includes the following nutrition-focused commitments:

- **Innovate the next generation of delicious food, made with natural ingredients.**
 - Through driving investments in innovation and renovation we aim to meet evolving consumer needs.
- **Create Healthy & Nutritious Food:** Offer consumers a compelling choice with essential nutrition to support healthy, balanced diets.
 - Through our Nutrition Benchmark Programme, we actively seek to improve recipes to meet or exceed nutrition benchmarks for saturated fat; beneficial nutrients and contain no trans-fats from partially hydrogenated vegetable oils.

5. Flora Food Group Nutrition Principles

We use Nutrition Principles to ensure our Nutrition Policy applies to Products, Marketing, Nutrition information and Research and Education within our business.

Products:

We will promote healthy, sustainable diets based on the *best available science* and advocating for change to support a thriving food system.

We will always use the best available science to work out what good nutrition and a healthy diet means. We will advocate for evidence-based nutrition science to be adopted into policy and public health initiatives via participation in industry, government and public health forums to further enable consumers to seek and identify healthy, sustainable diets. We will continue to strengthen our industry and academic partnerships to extend our reach and knowledge to enable healthy and sustainable diets as the default choice. We will conduct research studies and collaborate with partner universities to enhance expertise where necessary. We will share our findings within the scientific and public communities.

We will always *be better than the conventional dairy counterpart* on saturated fat and contain no trans-fats.

We focus on delicious products, that taste and perform as well as their conventional dairy counterparts. It is our ambition to always beat dairy counterparts on saturated fat levels, and to contain no trans-fats from partially hydrogenated vegetable oils. Beyond this we have set relevant targets to ensure we deliver positive nutrition benefits that make sense for the product (e.g. omega 3 and 6 for heart health) and the role each product plays in the diet.

We will add or limit other nutrients where this matters to consumers, in line with product propositions.

We provide our consumers with a wide range of products, in different categories. Nutrients are added (e.g. vitamins) or limited (e.g. saturated fat) to our products when they support the proposition and intended usage of the product. Through fortification of our products, with adequate levels of micronutrients, Flora Food Group can support healthy micronutrient intake. All fortification we use is scientifically justified and aims to improve or maintain health. Flora Food Group complies with applicable local regulations for fortification. In particular, many of our products are known as ideal vehicles for fortification with fat-soluble vitamins such as A, D and E, and we also fortify with calcium and Vitamin B12 in some cases, to support healthy, sustainable diets. Where regulations do not exist, Codex Alimentarius guidelines on nutrition labelling, nutrition and health claims, and for the addition of essential nutrients to foods are applied¹.

We will *benchmark* our products against relevant, recognised, science-based nutritional standards.

We take a scientific and purpose-driven approach to setting meaningful nutrition targets for our portfolio. We believe all foods should be formulated responsibly, with some of our products going over-and-above, in order to meet expectations on health. We have developed a benchmarking programme to ensure our products deliver on the desired nutrition composition and contribute to improving health through the provision of nutrients that target the world's greatest public health concerns such as heart health, and healthy growth and development for children. Our nutrition benchmark targets are based on international scientific standards (i.e. WHO, FAO) and dietary guidelines for healthy eating patterns. The benchmark targets also take into account the consumer who uses the product, how they use it and frequency of use.

Marketing:

We will ensure nutrition communications are *legal, fair, honest, responsible, and sensitive* to the views and needs of customers and consumers.

Nutrition information:

We will provide nutritional *information on pack* in line with applicable regulations. Where there are no regulatory requirements, we will follow Codex Alimentarius recommendations mentioned above².

We commit to offering consumers honest nutrition by ensuring our products are labelled, communicated and marketed in an ethical and responsible way.

We will make *nutrition and health claims* only in accordance with applicable regulations, otherwise the recommendations of Codex Alimentarius mentioned above³.

Nutrition and health claims will be used across our products and in marketing communications in a responsible manner to help consumers make informed choices for a healthy diet and lifestyle.

¹ Codex Alimentarius Guidelines on Nutrition Labelling (CAC/GL2, 1985), CODEX General Principles for The Addition of Essential Nutrients to Foods (CAC/GL 09-1987) and Codex Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997)

² Codex Alimentarius Guidelines on Nutrition Labelling (CAC/GL2, 1985)

³ Codex Alimentarius Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997)

We will not share misleading or unsubstantiated claims in our marketing and advertising materials, including the adoption of appropriate portion sizes where regulation does not mandate these.

We will provide interpretive *front-of-pack* nutrition information in accordance with regulations. We will follow voluntary recommendations only when they meet basic criteria for scientific substantiation, proven consumer understanding and fair competition.

Research and education:

We will actively engage in nutrition *research* in compliance with applicable ethical codes and always respecting academic independence and integrity.

We conduct or commission academic research to learn how the use of our products contributes to better overall dietary intake of key nutrients (NRV-R) for all consumer groups in all markets. We actively participate in research consortia that seek to further the understanding of diet and nutrition, food system transformation and sustainable diets. We maintain close contact with leading institutions to stay up to date on the latest and best thinking in public health and nutrition, and how to apply it.

6. Accountability and Governance

Flora Food Group's Head of Scientific Affairs is responsible for implementing our Nutrition Policy. The Compliance Committee includes representatives of Flora Food Group's Board and Executive Committee is involved in the approval process for our Nutrition Policy. The Compliance Committee is accountable for Flora Food Group's policy framework.

7. Monitoring

We have embedded our nutrition programmes and commitments into our product development and brand guidelines. We provide training to all Flora Foodies so that they understand and can apply our policy. Compliance with these requirements and progress towards agreed targets is reviewed at least annually and may be subject to independent, external verification. Where we do not meet our ambitions, we investigate and take action to improve.

8. Cooperation with Stakeholders

We are committed to driving positive change within the food system and work hard to cultivate relationships with suppliers, non-governmental organisations (NGOs), industry advocacy groups, Flora Food Group employees, consumers, investors, strategic partners, governments, communities and customers. We play as big a role in our sector as possible by working with sector associations and coalitions, including the World Economic Forum (WEF), The Consumer Goods Forum, WBCSD (World Business Council for Sustainable Development), and more. We work with a range of NGOs, charities, health professionals, academic and research institutions, and trade associations. Their support not only makes us a better corporate citizen, but their expertise and counsel also help to drive transformation in our business and in the food system.

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