

Responsible Soybean Oil Sourcing Policy

SUS 3

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1. Overview

The use of soy as an ingredient in food products is diverse. At Flora Food Group, some of our products contain soybean oil, one of the most widely consumed plant oils due to its versatility and health benefits.

Soybean oil is the primary ingredient that we use from soy. It is a by-product of soybean protein processing. We believe our use of soybean oil maximises crop productivity and efficiency, avoids potential waste and minimises environmental impacts.

Of the soybean oil we use, over 85% is grown in North America, and is compliant with local environmental regulations. The remaining volumes are sourced by suppliers who comply with the Amazon Soy Moratorium.

Society has rightly become more aware of the impact of ingredients and sourcing. In relation to soybean oil, these concerns include CO₂e emissions from land conversion, deforestation, groundwater depletion, land rights for indigenous peoples and loss of biodiversity. Flora Food Group shares these concerns. Our responsible sourcing approach ensures that the soybean used in our products is sustainably sourced.

2. Our Principles

- Flora Food Group's approach to the responsible sourcing of soybean oil is underpinned by our belief that as a leader in our categories, we have a duty to ensure the soy used in our products is sustainably sourced. At Flora Food Group the soy product primarily used in our products is soybean oil, which is usually a by-product of soybean processing. We have committed to eliminating deforestation across primary deforestation-linked commodities — including soy — with a target date of no later than December 31, 2025.
- We apply a cut-off date of 1st July 2018, which was the date Flora Food Group was created.
 - In sourcing areas with earlier cut-off dates stipulated through regional or national legislation, certification requirements or pre-existing sector-wide alignment (for instance, the Amazon Soy Moratorium) these supersede Flora Food group's cut-off date.
- Flora Food Group follows the Accountability Framework Initiative's (AFi) definitions.
- Flora Food Group requires suppliers to comply with the Amazon Soy Moratorium.
- We conduct risk assessments to determine the prioritisation of supplier risk with regards to deforestation based on traceability of soybeans.
- We seek to implement viable projects with soy farmers to protect soil integrity by supporting the planting of cover crops between seasons.
- Our Responsible Sourcing Policy reinforces our specific commitments on the adherence to rule of law, human rights, employee working conditions, and the environmental stewardship role we aim to play directly or through our supply chains.
- We require adherence to Flora Food Group's Responsible Sourcing Policy and Human Rights Policy, which stipulate mandatory requirements on human rights and protection of workers, with particular attention to be paid to migrant, and other vulnerable workers on farms, in line with the UN Guiding Principles, ILO Core Conventions, the UN Global Compact Principles, and Universal Declaration of Human Rights.
- We require our suppliers to apply the principles of Free, Prior and Informed Consent (FPIC) to ensure the protection and promotion of the rights of indigenous peoples and vulnerable communities, and to address and eliminate any potential violence and threats

against Forest, Land and Human Rights Defenders. We require that our supply chains comply with all applicable local laws and regulations.

- We will support non-compliant companies to develop an action plan to avoid future non-compliances. We expect non-compliant companies to provide restoration and/or compensation. We monitor the progress of these action plans closely before deciding whether to continue sourcing from companies who have violated our Principles.

3. Implementation Plan

We aim to ensure compliance with these guidelines and will maintain transparency in our operations, by requiring traceability from our suppliers, conduct risk assessment on an annual basis and engage suppliers to comply with these principles across their operations.

4. Grievances

We handle grievances related to our soy supply chain via our grievance process. Grievances are logged on our Grievance Tracker (Commodities).

5. Governance

Flora Food Group’s Chief Procurement Officer and Chief Sustainability Officer are responsible for implementing our Responsible Soybean Oil Sourcing Policy.

The Compliance Committee includes representatives of Flora Food Group’s Board and Executive Committee is involved in the approval process for our Responsible Soybean Oil Sourcing Policy. The Compliance Committee is accountable for Flora Food Group’s policy framework.

6. Related Documents

- Responsible Sourcing Policy
- Human Rights Policy
- Grievance Tracker (Commodities)
- Business Partner Code of Conduct

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