

Modern Slavery Statement

May 2026 | Version 1.0



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 sixth 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 2025.

About Flora Food Group

Flora Food Group is a global company, focused on providing culinary essentials that make it easier for people to cook and eat in ways that are better for their health and for the planet. With a portfolio of iconic brands and a presence across retail, and foodservice channels, Flora Food Group combines culinary know-how with innovation to service consumers, customers and communities in more than 100 countries.

Headquartered in Amsterdam, the Netherlands, Flora Food Group combines deep expertise in oils and fats with strong in-house capabilities across R&D, sourcing, and commercial execution and works closely with its manufacturing and supplier partners to bring that to life at scale.

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?

Our most salient human rights risks and impacts were identified through a risk assessment in 2023, which was reviewed and revalidated in 2025. The aim was to ensure that our supply chain due diligence prioritises the most salient issues. As part of this process we reviewed the actual and potential impacts within the scope of our operations and supply chain. This included analysing the approach of our peers and industry sector, and the social risks our operations and supply chain (based on

factory location and high-risk commodity sourcing origins). In addition, we considered public reports on human rights issues raised by civil society and NGOs, and complaints received through our grievance mechanisms. We concluded that in our supply chain the salient issues are the non-respect of health and safety standards, working hours and legal wages, and forced labour issues, particularly in our palm oil supply chain.

Human and Labour Rights

Based on the 2025 Human Rights Risk Assessment, we identified that the material impacts focus on forced labour practices and fair working conditions for our high-risk ingredients, particularly in the palm oil supply chain.

The identification of forced labour practices and fair working conditions as negative impacts 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, prevent, mitigate, monitor, and communicate** forced labour and fair working conditions as a salient human rights issues in our supply chain. Consequently, Flora Food Group has established a comprehensive approach to combat forced labour and fair 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 2025, 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 2025, 98% completed the training. To ensure our manufacturing sites meet our ethical and human rights standards, we conduct SEDEX Members Ethical Trade Audits (SMETA) programme at our owned manufacturing sites. Audits include worker and contractor interviews. By the end of 2025, 92% of our manufacturing

sites have been audited within the last 3 years.

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

We deploy human rights requirements in our contracts and due diligence processes, as needed. Particularly, in 2025 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 fair working 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 2025, 96% of our in-scope suppliers have completed an SAQ. In 2025, we also continued the programme to audit third-party manufacturers, in additions to their SEDEX SAQ assessment. By the end of 2025, 73% of our third-party manufacturers had done a SMETA audit within the last 3 years. 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 2025, 84% of our high-risk suppliers have completed a SMETA audit. We had a specific focus on the following categories: Logistics, Packaging and Equipment and MRO reducing our risk exposure of unassessed suppliers by 60%.

- **Complaints and grievances**

In 2025, we maintained robust processes for the management of human rights related complaints and grievances. This comprises the Speak Up channel, 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**

With complex supply chains across multiple categories, working in partnership is essential. We seek to advance human and labour rights in our value chain through

active engagement in multi-stakeholder initiatives. In 2025, we continued to partner 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, this collaboration of retailers, manufacturers and other stakeholders aims to raise industry standards and promote ethical practices.

Furthermore, in 2025, Flora Food Group continued its partnership with Earthworm Foundation (EF), supporting the Social and Human Rights programme of the Southern and Central Forest Spine Landscape in Malaysia. The efforts in 2025 focused on strengthening partnerships and driving collective action to address systemic labour challenges, including forced labour and unethical recruitment practices. With refineries, this programme cascaded HRDD practices across palm oil supply chains. Engagement with civil society organisations (CSOs) supported the development of remediation frameworks, while partnerships with government agencies ensured alignment with national labour priorities. EF also worked with private recruitment agents to promote ethical hiring standards.

2026 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.

Approval

This Statement is aligned with Flora Food Group Annual Report.

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 2025 and the board of directors of each of these UK companies has approved this statement.