FLORA Food Group™

Human Rights Policy

SUS 6

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1. Purpose

I. Introduction

Following UN Guiding Principles on Business and Human Rights, respecting and promoting human rights is fundamental to Flora Food Group. Our purpose is to deliver Culinary Essentials for Better Food, and we have a responsibility to operate in line with high standards of integrity and ethics according to internationally recognised human rights standards.

Consequently, all our operations and supply chain activity will be guided by this Human Rights Policy and its principles, which have been overseen and approved by our Compliance Committee (Executive level).

This policy applies to all Flora Food Group entities, including our factories, offices, and operations, as well as to our business partners, customers, and other relevant stakeholders in our supply chains.

II. Respecting Human Rights

For the development of Flora Food Group's operations, Associates, business partners, customers, and other relevant stakeholders must not interfere with the enjoyment of human rights recognised in international instruments such as the Universal Declaration of Human Rights, the International Bill of Rights, the International Labour Organisation's Fundamental Conventions, the UN Global Compact Ten Principles, and other relevant mandatory international legal instruments.

The mentioned stakeholders must also comply with the applicable regional and national regulations for protecting human rights where our operations are developed, such as the UK Modern Slavery Act, and the German Supply Chain Due Diligence Act, among other national and regional regulations as well as other relevant Business and Human Rights National Action Plans.

Whilst we implement policies and systems and our core focus is to prevent such occurrences, if, in any circumstance, Flora Food Group has conducted inadequate due diligence and discovers any adverse impact that leads to a violation of human rights, we will immediately investigate and take all necessary measures to remediate the victims of human rights violations. Central to our respect for human rights is our commitment to the rule of law and to compliance with the law wherever we operate, and we therefore expect and ensure the same commitment from all Flora Food Group employees, business partners, customers, and other relevant stakeholders so that our entire value chain is accountable for any violation of human rights.

III. Our approach to Human Rights

In accordance with the UN Guiding Principles on Business and Human Rights, we have established an internal periodical process for identifying, preventing, and mitigating human rights risks derived from our operations and supply chain.

We have defined our human rights due diligence process based on a risk assessment that evaluates the human rights that could be impacted considering the aim of our operations, the places where we are located and the interaction we developed with our stakeholders.

Flora Food Group's human rights due diligence process has been developed in collaboration with external experts in human rights to ensure we follow recognised guidance and processes. As a result, we have determined our Human Rights Principles on the basis of the identified salient risks from our operations and supply chain.

IV. Human Rights Principles

These are the principles that reflect our minimum expectations from our Associates, business partners, customers, and other relevant stakeholders in our supply chains:

1. Zero-Tolerance of all forms of forced labour and human trafficking

Flora Food Group prohibits, in its operations and supply chain, using all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any form of human trafficking.

2. Zero-tolerance of child labour

Flora Food Group prohibits child labour as defined by international standards and relevant national laws. Child labour will not be tolerated in any stage of our operations or supply chain.

3. Zero-tolerance for any violence or harassment

Flora Food Group is committed to maintaining a workplace free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. We will not tolerate disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind.

4. Non-discrimination

Flora Food Group is committed to guaranteeing equal opportunities and will not tolerate any discrimination. We work to maintain workplaces free from discrimination or harassment based on race, sex, colour, national origin or socio-economic status, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law.

5. Freedom of Association and Collective Bargaining

Flora Food Group respects the rights of Associates to join or form a labour union without fear of reprisal, intimidation, or harassment. Where a legally recognised union represents Associates, we are committed to establishing a constructive dialogue with their freely chosen representatives.

6. Fair wages and working conditions

Flora Food Group will take the necessary measures to respect labour rights, ensuring full compliance with applicable dispositions that regulate the legal wage, work hours, overtime and other benefits established by law.

7. Workplace Health and Safety

The health and safety of Associates, visitors and contractors at work are extremely important to us. Flora Food Group's commitment is to provide a safe and healthy workplace that complies with all relevant laws and regulations and our requirements. We

work to provide and maintain a safe and healthy workplace, in consultation with Flora Food Group employees, by proactively addressing any identified risks.

8. Data Protection and Privacy

Following international principles, relevant national laws and security practices, the respect for people's right to a private life, digital security and privacy are of paramount importance to Flora Food Group. We will secure data against unauthorised access and protect personal and sensitive information collected from internal and external stakeholders. Flora Food Group will only process data in accordance with the rights of individuals and recognised principles of fairness, transparency, purpose limitation, minimisation, accuracy, accountability, storage and security.

9. Healthy, Sustainable Diets

Flora Food Group recognises the right to adequate food as part of the fundamental right to an adequate standard of living. We seek to provide transparent nutrition information to enable consumers to make informed choices consistent with healthy, sustainable diets.

10. Stakeholder Engagement

As part of our human rights due diligence process, we are committed to engaging with the stakeholders our operations could impact. Specifically, we are committed to promote constructive dialogue with the local communities that our operations could impact. We also recognise the importance of respecting communities' land rights, the rights of indigenous people, and aim to protect them. We aim to listen to, learn from, and consider other views as we conduct our business.

11. Healthy Environment and Just Transition

Flora Food Group is committed to respecting and promoting the right to a clean, healthy, and sustainable environment. For that purpose, we will advocate and act toward a just transition for the food system.

V. Third Party Application

Along with the Responsible Sourcing Policy and the Business Partner Code of Conduct, this Policy establishes the minimum principles we expect our suppliers to uphold and urges them to adopt similar policies to develop all their commercial activities. In addition, respect for human rights is also covered in our ingredients-specific policies, including Palm Oil, Paper and Pulp, Soybean Oil, and Coconut.

Business partners must ensure that their actions or omissions do not interfere with Flora Food Group's Human Rights Principles. In accordance with our Human Rights Risk Assessment process, we will periodically identify high risk suppliers and will take all necessary measures to overview the compliance of this policy and its principles closely.

We will support non-compliant suppliers to develop an action plan to avoid future non-compliance. We expect non-compliant suppliers to ensure that remediation and compensation are provided. We will monitor the progress of the action plans closely before deciding whether to continue sourcing from companies that have violated our principles.

VI. Implementation Mechanisms

Governance and cross-functional working

Flora Food Group will maintain an appropriate governance structure at the global and local levels to oversee the implementation of the Human Rights Policy.

Risk assessment and salient risks

We will conduct a periodical human rights risk assessment to identify actual and potential salient human rights risks and analyse, weigh, and prioritise the identified risks. We will ensure to maintain the necessary policies and processes to address the most salient risks.

Due Diligence

We will maintain robust contractual requirements and due diligence processes embedded within supplier onboarding, policy and ethical assessment programmes, and uphold certification appropriate to high-risk ingredients supply chains.

Supplier Engagement & Collaboration

We will continue engaging directly with our supply chain partners to mitigate salient human rights risks in our supply chains and work with them to ensure policy compliance and collaborate with industry partners to drive improvement.

Reporting Concerns & Grievance Mechanisms

Flora Food Group maintains appropriate mechanisms for Associates, and business partners to raise potential issues and violations of this policy. Associates, are encouraged to ask questions or raise any concerns with their line manager, Human Resources or Legal Counsel. Associates, and other stakeholders can also report suspected policy violations through our confidential reporting tool "SpeakUp".

No reprisal or retaliatory action will be taken against any Associates for raising concerns about this Policy. Flora Food Group will investigate, address, and respond to the concerns and will take appropriate action in response to any violation to enhance our strategies and to ensure human rights, respect and protection.

Awareness & Training

We will ensure Flora Food Group employees, are aware of this policy and how to report issues. We will provide periodic training for Associates, and training for specific roles where appropriate.

Communication

We will communicate progress internally and externally through appropriate mechanisms to demonstrate progress and transparency, for example, in our non-financial reporting and Modern Slavery Statement.

VII. Responsibilities

Flora Food Group's Chief Operations Officer (Executive Committee member) is responsible for the Human Rights policy. *The Chief Procurement Officer and Head of Climate, Nature and Responsible Sourcing are accountable for its implementation.*

The Compliance Committee is accountable for Flora Food Group's policy framework. The Compliance Committee includes representatives of Flora Food Group's Board and Executive Committee and is involved in the approval process for the Human Rights policy.

2. Related Documents

1. *Code of Conduct*
2. *Responsible Sourcing Policy*
3. *Business Partner Code of Conduct*
4. *Responsible Palm Oil Sourcing Policy*
5. *Responsible Soybean Sourcing Policy*
6. *Responsible Coconut Oil Sourcing Policy*
7. *Responsible Pulp and Paper Sourcing Policy*
8. *Privacy Policy*
9. *Modern Slavery Act Statement*

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