

Sustainable Sourcing Policy for Finnebrogue Group

INTRODUCTION

At Finnebrogue, doing what's right for people and planet is integral to everything we do. The **Bigger Picture** is our programme to produce food that doesn't cost the Earth. Seeing the Bigger Picture means we are committed to conducting business in ways that respect and preserve the environment, protect human rights, and promote the well-being of all workers in our supply chains. We strive to work with suppliers who share our commitment to ethical conduct, social responsibility, and environmental stewardship.

Finnebrogue cannot be a more sustainable business without working with suppliers who are sustainable themselves, or by supporting suppliers to improve their sustainability performance. As such this policy guides our sourcing and procurement decisions with a focus on environmental and social responsibility. It sets out the **requirements for sustainable sourcing** and the criteria Finnebrogue use to assess suppliers and their practices, ensuring our products meet customer expectations and comply with all legal requirements. Finnebrogue Supplier Engagement Team is responsible for implementing and monitoring this policy.

EXPECTATIONS

Finnebrogue has established minimum expectations for all suppliers across ethics and environmental standards. These are detailed in:

- **Annex 1** – Minimum expectations all suppliers must meet.
- **Annex 2** – Future expectations we are working towards collaboratively with our suppliers.

Our broader requirements are set out in the **Finnebrogue Supplier Code of Conduct**. All suppliers must read, understand, adhere to, and sign this document. In addition, suppliers are expected to:

- Comply with all applicable environmental and ethical laws in their country of operation.
 - Ensure their own suppliers comply with relevant environmental and ethical legislation in their jurisdictions.
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ENVIRONMENTAL COMMITMENTS

Finnebrogue is committed to ensure the protection, recovery, and regeneration of the environment that our supply chain operate in. We are actively working with suppliers to improve capability in developing sustainability initiatives, provide carbon training, and integrating environmental footprinting into our new product development (NPD) and carbon management systems to help Finnebrogue achieve net zero by 2040.

Environmental considerations Finnebrogue's Supplier Engagement team use when selecting suppliers include:

1. **Biodiversity** – Responsible land management that protects and enhances biodiversity, safeguards endangered species, and conserves or restores habitats.
2. **Water Stewardship** – Efficient water management practices that minimise consumption and protect local water resources and ecosystems.
3. **No Deforestation or Land Conversion** – Verified policies and monitoring to ensure forest-risk commodities (e.g., palm oil, soya, timber, cattle products) are deforestation- and conversion-free, with full supply chain transparency.
4. **Low-Impact Production** – Reduced carbon footprint, waste, and pollution through sustainable farming and circular manufacturing methods.
5. **Regenerative Agriculture** – Practices that restore soil health, enhance biodiversity, and capture carbon, such as cover cropping, rewilding, and nutrient runoff prevention.
6. **Low-Carbon Energy** – Measurable actions to reduce greenhouse gas emissions, including transition to renewable or low-carbon energy and reduced reliance on fossil fuels.

Deforestation

As set out in Finnebrogue's **Deforestation and Land Conversion-Free (DCF) Policy for Palm Oil and Forest-Risk Commodities**, and in line with EUDR legislation and customer requirements, Finnebrogue is committed to achieving deforestation- and land-conversion-free (DCF) supply chains by the end of 2025.

Suppliers of both direct and indirect forest-risk commodities (including palm oil, soya, soya-based animal feed, timber, and cattle-derived products) must:

- Provide evidence and certification verifying deforestation-free status.
- Maintain full traceability for all materials.
- Cease trading with any suppliers found to be engaged in deforestation or illegal land conversion.

More detail on acceptable certification and evidence is located in Finnebrogue's **Deforestation and Land Conversion-Free (DCF) Policy for Palm Oil and Forest-Risk Commodities**.

ETHICAL COMMITMENTS

We recognise that social responsibility is essential for a sustainable, and equitable supply chain. Finnebrogue's stance on the prevention and mitigation of modern slavery is detailed in our **Modern Slavery Policy**. All suppliers must adhere to its principles.

Ethical Considerations Finnebrogue's Supplier Engagement team use when selecting suppliers include:

1. **Business Integrity** – High ethical standards, including transparency, honesty, and fair dealings.
2. **Human Rights** – Fair treatment of workers, safe working conditions, and protection from discrimination.
3. **Equity & Inclusion** – Commitment to diversity, inclusivity, and equal opportunities.
4. **No Exploitation** – Zero tolerance for forced labour, child labour, or any form of human rights abuse.

Country of Origin

We maintain a Prohibited Areas Sourcing country list, which outline countries that Finnebrogue



should not be sourcing from, this list is reviewed regularly to reduce the risk of human rights violations in our supply chain and to align with customer expectation. Supplier are expected to adhere to Finnebrogue to this list. The Prohibited Areas Sourcing country list is available on request.

COLLABORATION AND CONTINUOUS IMPROVEMENT

Achieving Finnebrogue's sustainability goals depends on active cooperation from all stakeholders—especially suppliers. To foster this, Finnebrogue commits to:

- Clearly communicating sustainable sourcing expectations to all current and potential suppliers.
- Requiring all suppliers and vendors to acknowledge and adhere to the **Finnebrogue Supplier Code of Conduct**.
- Conducting annual **Supplier Environmental and Social Assessments** (SESA) to monitor ongoing supplier alignment to Finnebrogue expectations.
- Supporting suppliers through guidance and corrective action plans to improve and maintain compliance.
- Encouraging innovation and adoption of best sustainability practices throughout the supply chain.
- Evaluating new suppliers rigorously through pre-acceptance questionnaires during the New Product Development (NPD) stage to ensure alignment with Finnebrogue's environmental, social, and safety standards.
- Use results from the SESA score to inform cross departmental supplier ABC list to ensure higher performing supplier are noted are preferential suppliers

Finnebrogue maintains continuous oversight by monitoring sustainability alignment at the NPD phase and annually thereafter, ensuring all suppliers meet the company's standards and contribute to collective progress toward a more sustainable future.

COMPLIANCE AND REPORTING

Finnebrogue is committed to complying with all relevant laws and regulations regarding sustainable sourcing and procurement. We will be transparent in reporting our progress and challenges in implementing this policy, both to our stakeholders and the public.

By adhering to this Sustainable Sourcing Policy, we aim to play our part in protecting the environment, promoting social well-being, and driving positive change in the food industry. We believe that through conscious sourcing and procurement decisions, we can contribute to a more sustainable and ethical future for all.

This policy will be regularly reviewed and updated to reflect evolving best practices and industry standards in sustainable sourcing.

Signed

Andrew Nethercott
Chief Executive Officer

ANNEX 1

Current Sustainability Expectations
All suppliers have fully calculated annual Scope 1 & 2 carbon emissions and set carbon reduction targets.
All suppliers must be registered on SEDEX.
All suppliers have a Human Rights policy (covering internal and supply chain workers).
All suppliers have an Anti-Modern Slavery Policy (externally published).
All suppliers have an Environmental Monitoring System (monitoring at a minimum waste, energy use, and water consumption).
(For ingredients containing animal products) All suppliers must be on track to achieve deforestation-free livestock feed within their supply chains by the end of 2025
(For suppliers of direct forest risk commodities) All suppliers must have a target to achieve verified or certified deforestation- and conversion-free products and EUDR compliance by 2025
All primary and secondary packaging to be recyclable (minimum at front of store) by 2026.
All plastic components must have a minimum of 30% recycled content (verifiable through HMRC-acceptable plastic origin certification).
Paper and card packaging must be FSC, PEFC, or FLEGT certified.
All suppliers to commit to sharing specifications for all packaging items (required for Extended Producer Responsibility and Plastic Packaging Tax reporting).

ANNEX 2

New Sustainability Expectations
Sustainability Transparency: To share product LCA data and calculated emission factors with Finnebrogue.
All meat suppliers to collect an agreed quantity of farm-level data annually, provided to Finnebrogue, to calculate the environmental impact of raw materials (including carbon emissions and other environmental indicators).
All suppliers to have calculated Scope 3 carbon emissions.
All suppliers to have conducted a Human Rights Risk Assessment within their key supply chains.



All suppliers to have a formal policy to promote and protect biodiversity at farm (primary production) level, with evidence of actions.

All ingredient suppliers to have signed up to WRAP's Food Waste Reduction Roadmap (to reduce food waste intensity by 50% by 2030).