

Deforestation and Land Conversion-Free (DCF) Policy for Palm Oil and Forest-Risk Commodities

INTRODUCTION

At Finnebrogue, we are committed to ensuring that our supply chains are free from deforestation and land-use conversion, with a focus on key commodities that pose significant deforestation risk. Our dedication to the pursuit of this commitment aligns with our values as a food manufacturing company that strives to produce food that doesn't cost the earth. As a company that produces sausages, bacon, and plant-based alternatives we are intrinsically linked with the environment. Therefore, we accept responsibility and recognise the importance of protecting global forests, their biodiversity, and the communities that depend on them.

This policy establishes our commitment to **deforestation and land conversion-free (DCF) supply chains**, aligning with EUDR legislation, customer requirements, and Finnebrogue's core sustainability values. Finnebrogue Supplier Engagement Team is responsible for implementing and monitoring this policy.

SCOPE

This policy applies to all Finnebrogue operations and suppliers, focusing on **forest-risk commodities** including:

- **Direct Forest Risk ingredients:** Beef, Soya, and products containing Palm Oil.
- **Indirect Forest Risk ingredients:** Other Meats, Dairy Products, and Eggs, these are considered forest risk ingredients due to the deforestation risk associated with soya and palm used as livestock feeds for the producer animals.

Deforestation Cut-Off Date: No sourcing of materials produced on land that has been **deforested or converted after December 2020**. This applies to both **direct and indirect forest-risk ingredients**, including soya and palm oil.

POLICY STATEMENT

Finnebrogue is committed to:

1. Ensuring all supply chains are **free from deforestation and land-use conversion**, with a target of achieving **deforestation-free sourcing by the end of 2025**.
2. Ensure all products sold and ingredients purchased, that fall within the scope of EUDR, are fully compliant with EUDR requirements.
3. Sourcing commodities and ingredients through **certified supply chains** or from **low-risk regions**, verified by credible deforestation-free certification schemes.

4. **Palm Oil requirement:** All palm oil used in ingredients or raw materials must meet **deforestation-free standards**, with preference for **100% segregated RSPO palm oil**. No palm oil shall be accepted unless it is deforestation-free.
5. Encouraging suppliers to reduce or replace soya as livestock feed with **certified deforestation-free alternatives**.
6. Reporting transparently on progress toward **deforestation-free supply chains**, including the level of verified deforestation-free palm oil and soya, and collaborating with suppliers and stakeholders to continuously improve sourcing practices.

SUPPLIER REQUIREMENTS

Suppliers of **forest-risk commodities** are expected to comply, on a commodity basis, with the requirements set out in **Annex 1**, and additionally to:

- Hold a **deforestation-free commitment** in line with Finnebrogue expectations by 2025.
- Complete annual assessments including:
 - **Deforestation Free Compliance Questionnaire**
 - **Supplier Environmental and Social Assessment (SESA)** via Foods Connected
- Provide verifiable evidence of deforestation-free sourcing for direct and indirect forest-risk commodities including certificates, shipping documents, or approved schemes listed in Annex 1.

IMPLEMENTATION, MONITORING, AND REVIEW

Finnebrogue will:

- Collaborate with suppliers, industry partners, and stakeholders to achieve **deforestation-free supply chains and EUDR compliance**.
- Monitor compliance through **annual questionnaires, SESA data collection, and supply chain mapping**.
- Report compliance to customers via report submission to **3Keel**.
- Ensure **continuous improvement** in sourcing practices, with transparent reporting on progress toward deforestation-free supply chains, including palm oil and soya.

This policy will be reviewed regularly to ensure alignment with legislation, best practices, and Finnebrogue's sustainability goals.

Signed



Declan Ferguson

Group Director, Product Development & Innovation

Annex 1

Commodity	Compliance Requirements
Beef	Must be EUDR compliant
Soya (Direct / Bulk)	Must be EUDR compliant
Soya (Indirect / Embedded)	Must be certified under an approved deforestation-free scheme (e.g., RTRS, ProTerra, ISCC Plus, SFAP, ADM Responsible Soy v3, Bunge Pro S, Cargill Triple S, etc.) OR evidence of sourcing from low-risk countries (Europe, North America)
Palm Oil (Raw)	Must be 100% segregated and EUDR compliant
Palm Oil (in ingredients / processed products)	Must be RSPO-certified, 100% segregated
Wood & Paper (Packaging)	Must be FSC or PEFC certified
Other Deforestation-Risk Commodities (Cocoa, Coffee, Rubber, etc.)	Not purchased directly by Finnebrogue