

Ornua Co-operative Limited

Modern Slavery & Human Trafficking Statement

31 December 2022

Our Commitment

Ornua's co-operative ethos is at the heart of who we are and how we do business. Ornua is committed to building sustainable livelihoods for all our employees, who in turn drive sustainable profits for our co-operative members and the Irish dairy farming families we proudly represent..

A fundamental part of our ethos and purpose is to protect human rights, including combatting modern slavery and human trafficking, in all aspects of our international business operations. Modern slavery refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, deception, coercion, or abuses of power. Human trafficking is the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit. Ornua recognises the need to remain vigilant to mitigate against all modern slavery and human trafficking risks within

our business and supply chain and is committed to implementing effective practices and policies to do so.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes the Modern Slavery and Human Trafficking Statement of Ornua Co-operative Limited and its subsidiaries ("Ornua") for the financial period ended 31 December 2022.

We welcome the transparency encouraged by the Act and the opportunity to share our actions to identify and prevent modern slavery risks affiliated with our business operations.

About Ornua

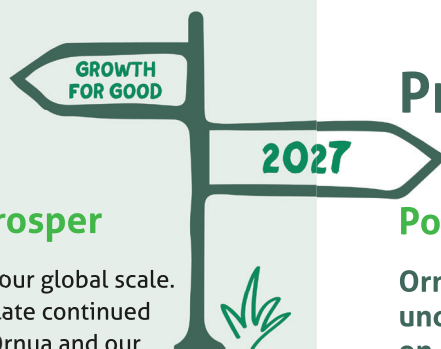
Our Organisational Structure

Ornua is an agri-food commercial co-operative which markets and sells dairy products on behalf of our members, Irish dairy processors. Ornua is Ireland's largest exporter of Irish dairy products.

Ornua's expertise in building sustainable routes to market adds value to Irish milk and secures strong returns for our members and, in turn, Irish dairy farmers. Ornua is headquartered in Dublin and exports to over 110 countries. Ornua is comprised of:

Ornua Foods, which is responsible for the global marketing and sales of Ornua's consumer products portfolio, including the KERRYGOLD, PILGRIMS CHOICE, DUBLINER, FORTO, GREEN FLAG and BEO brands. Markets are served through wholly owned subsidiaries, production facilities and in-market teams in Africa, Asia, Germany, Europe, the Middle East and the US.

Ornua Ingredients, which is responsible for the procurement of Irish and non-Irish dairy products and for the sale of dairy ingredients to food manufacturers and foodservice customers across the world. Operating out of Ireland, the division exports dairy ingredients to over 110 countries and is supported by key subsidiaries in Africa, Spain, Saudi Arabia, the UK and the US.



Ornua's Strategy – Path to Prosper

Ornua recently adopted a new five-year strategic growth plan called **Ornua 2027 - Path to Prosper**. Path to Prosper will drive our purpose forward, underpinned by our values, to help us realise our vision to drive sustainable, profitable, growth and deliver customer success by investing in our dedicated people, our

brands, and our global scale. It will stimulate continued growth for Ornua and our stakeholders, building on the consistent progress and success achieved in the last number of years. In turn, our customers, our people, and the communities we serve, can continue to grow and prosper.

Our Values

Ornua recognises our global success would not be possible without the close collaboration, care, and commitment of our employees. Ornua's ambition is to be a truly diverse organisation where every individual feels empowered to bring their true selves to work every day; to be a leading, accredited employer of choice which retains and attracts top talent, allowing us to maximise our impact in the communities in which it operates.

In 2022, following detailed employee input and close collaboration across the global business Ornua designed and introduced a new set of company values to underpin this ambition. These values - Achieve great things together; Be our true selves; Make it happen; Seek and embrace new ideas; and Show you care - empower each employee to never look the other way when something isn't right and to make decisions based on what is the right thing to do.

Protecting People

Policies and Procedures

Ornua has a number of policies and processes to underpin our strategy and values, and provide clarity on how together we act ethically and with integrity to protect every one of our employees and prevent forced labour and human trafficking in our business, as follows:

Code of Business Conduct & Ethics sets out the key principles that constitute our way of doing business ethically. All employees are responsible for ensuring adherence to this Code.

Dignity at Work policy ensures fair employment practices and equality of opportunity for all current and potential employees, by promoting a work environment free from discrimination, intimidation or harassment.

Ethical Trading Policy is based on the principles in the Ethical Trading Initiative and sets the ethical standards that Ornua's UK subsidiaries adhere to in tackling modern slavery.

Our **Employee Assistance Programme** is available to all our employees and their families to provide independent and informed support to safeguard their wellbeing and address work or personal concerns.

Our **Health and Safety Management System** commits to creating a culture with heightened focus on health and safety to provide a safe place to work on all our sites.

The **Diversity & Belonging team** are responsible for fostering a culture where everybody can bring their whole selves to work.

Ornua's 'Spring Wellbeing' initiative ensures employees feel supported and can thrive in the workplace. A dedicated Spring Wellbeing team run employee-focussed wellbeing initiatives across all our key locations.



Our HR Teams across the globe conduct rigorous 'right to work' checks when hiring, to ensure only individuals entitled to take up employment are hired in a particular country. In addition, on occasion we sponsor visas/work permits for specific skilled individuals, following due immigration process in each jurisdiction and ensuring salaries for such roles are at fair market rate.

Managing Our Supply Chain

Policies

Ornua's business philosophy, rooted in our co-operative ethos, requires that we aim to work only with business partners who can consistently meet with our standards and specifications and are committed to values of conduct that are compatible with our own.

We have implemented the following policies to ensure our suppliers meet these standards:

Our **Business Partner Code of Conduct** sets out the minimum standard required of our suppliers. This code reflects Ornua's commitment to operate responsibly and uphold human rights. The code mandates compliance with fundamental requirements in relation to provision of safe places of work, decent working conditions, protection of the environment, and ethical business conduct (anti-bribery and corruption). The Code is informed by the UN Guiding Principles on Business and Human Rights, the Core Conventions of the International Labour Organisation (ILO) and the Sustainable Development Goals (SDGs), which are a global vision set out by the United Nations to end poverty, protect the planet, and ensure prosperity for all by 2030. Since 2022, Ornua's standard contracting terms require all suppliers to adhere to this code. The Procurement team in Dublin

and our sales teams based in Africa and the Middle East received training on the Code during 2022, further training will be rolled out to key teams in 2023.

Ornua's Counter-Party Approval Process ensures all business partners (customers, consignees, and suppliers) are screened prior to doing business with Ornua to ensure they have a clean record and have not been convicted of any criminal activity, including modern slavery and human trafficking. Relevant financial teams receive training on this process.

Ornua's Procurement Category Management Strategy Policy ensures we source the right suppliers who accept and comply with Ornua's policies.

Ornua is developing a **Group Responsible Sourcing Framework**. This is supported by a dedicated Group Responsible Sourcing role. The framework will include relevant policies, processes and metrics for responsible sourcing of priority raw materials including dairy, soya, palm oil and fibre-based packaging. Environmental and social risks including deforestation, climate change and human rights will be considered as part of the framework.

Independent Platforms

To support our internal policies, Ornua is a member of organisations that provide independent support and verification of our actions to mitigate the possibility of modern slavery risks in our supply chain.

A number of our manufacturing facilities in Ireland, England and North America are members of SEDEX, a platform for businesses to collaborate on ethical and responsible practices in their business and supply chain. Member sites are audited against ethical and human rights standards, usually in the form of SEDEX Member Ethical Trade Audit (SMETA). The SMETA audit is based on the Ethical Trading Initiative base code and local UK laws. Ornua also uses the SEDEX platform to help assess and verify the ethical standards of our suppliers.

Ornua is in the process of transitioning to a shared group wide management system called 'Foods Connected'. This process is now live across our sites in the UK and Ireland and we are continuing the process of adding all sites to the Foods Connected System. This will complement the onboarding process for suppliers of raw materials to Ornua, which includes the requirements to share a supplier SEDEX membership number or where a SEDEX supplier membership number is not available, a detailed assessment is completed which covers all aspects of potential business risks, including modern slavery risks. The completed

detailed assessment is then added to the Foods Connected system.

Ornua is a Sustainable Agriculture Initiative (SAI) Partnership Member. This is one of the primary global food and drink value chain initiatives for sustainable agriculture. They aim to empower members, catalyse change, and drive sustainable practices. SAI have the vision of a sustainable, thriving and resilient agricultural sector that protects the earth's resources, human rights and animal welfare.

Ornua is also a member of SAI's leading dairy platform, the Sustainable Dairy Partnership programme which provides transparency throughout our value chain and ensures an industry-wide collaborative approach to sustainability from producer, processor to buyer. This partnership's purpose is to accelerate the adoption of sustainable agricultural practices and food systems. Each member reports on working and living conditions, health & safety, legal compliance and communities.



External Accreditations

In 2022, Ornua received objective recognition from several independent organisations for our activities implemented to protect our employees and pursue ethical business practices.

BUSINESS WORKING RESPONSIBLY MARK

(Business in The Community Ireland):

Ornua was awarded the Business Working Responsibly Mark, in partnership with Business in the Community and third party verified by the National Standards Authority of Ireland (NSAI). This is a leading business sustainability certificate and supports the integration of environmental and social imperatives into core business practices. This standard assesses the effectiveness of our management systems in addressing the social responsibilities that are relevant to our purpose and vision and how this impacts our stakeholders, customers, employees, communities and the environment.

The standard was awarded following a six-month assessment in five core pillars: Ornua's Corporate Social Responsibility Governance, Workplace, Marketplace, Community and Environment. The Business Working Responsibly Mark is a testimony to Ornua's excellence in ethical, environmental and social governance.

ORIGIN GREEN GOLD MEMBERSHIP:

Ornua retained our Origin Green Gold Membership by surpassing targets and scoring exemplary for initiatives relating to diversity and inclusion, and community engagement, as well as raw material sourcing, emissions, and waste.

IBEC KEEPWELL MARK:

Ornua was recognised as a leading employer in wellbeing through the IBEC Keepwell Mark, an accreditation designed to acknowledge and celebrate companies at the forefront in promoting corporate wellness within company policy.

Oversight And Reporting

Reporting Channels

Ornua's has an open-door policy that gives employees the freedom to approach any member of management with ethical questions or concerns relating to our business. To support this approach, our Whistleblowing Policy provides a framework for our employees and suppliers to report concerns about illegal, dangerous or unethical conduct within our business, without fear of reprisal.

An independent 'Speak Up' service is available 24/7 for employees to raise concerns, on an anonymous basis if necessary. All whistleblowing incidents are reviewed by our audit committee, fully investigated, and appropriately actioned. In 2022, there were no reports received relating to modern slavery risks.

Cross Functional Leadership

In 2022, we formed a cross-functional team comprising of representatives from our legal, procurement, operations, technical, HR and risk management functions to evaluate and strengthen the measures we have in place to prevent modern slavery and human trafficking occurring within our business and supply chain, including the following:

- » **Share insights from each area of the business and how it impacts on this issue.**
- » **Evaluate existing measures that are in place and identify new measures.**
- » **Develop and embed a risk assessment programme to continuously identify and mitigate modern slavery risks.**
- » **Raise awareness across the business of modern slavery and human trafficking risks and actions to address these risks.**

We are confident that this team will help strengthen existing measures and raise awareness across Ornua of the vigilance and actions needed to eliminate modern slavery and human trafficking.

Training

To ensure a high level of understanding of the risk of modern slavery, Ornua provides dedicated training to relevant employees. This training will be ongoing as we understand that continuing to raise awareness is key in addressing the risk of modern slavery in our business and supply chain.

Approval

The statement has been approved on 27 July by the board of Directors of Ornua Co-operative Limited and the boards of directors of Ornua Foods UK Limited, Ornua Ingredients Europe (UK) Limited and Ornua Nutrition Ingredients Limited and signed by Aidan O'Driscoll a Director of Ornua Co-Operative Limited.