

Ornua Co-operative Limited

Modern Slavery & Human Trafficking Statement

28 December 2024

About Ornua

Our Commitment

Ornua's co-operative ethos is at the heart of who we are and how we do business. Our co-operative structure requires that our business is founded on the principles of sustainable growth and shared equity for our members. Ornua's governance model is built on values of co-operation and solidarity. The fundamentals of responsibility, sustainability, and equality define our co-operative structure and identity.

An integral part of Ornua's ethos is to protect human rights, including combatting modern slavery and human trafficking, in all aspects of Ornua's 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 implement effective practices and policies to mitigate against all modern slavery and human trafficking risks within our business and supply chain.

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 28 December 2024.

Ornua welcomes 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.



Our Business

Ornua is an Irish dairy co-operative that markets and sells dairy products on behalf of its member co-operatives, Ireland's dairy processors and, in turn, Irish dairy farmers. Ornua is Ireland's largest exporter of Irish dairy products and has annualised sales of over €3.4 billion. Headquartered in Dublin, Ornua has a global team of approximately 2,800 employees, operating from 10 business units worldwide, including 12 production facilities.

A key function of Ornua is to build profitable routes to market for Irish dairy products. The Group is structured across two divisions: Ornua Foods and Ornua Ingredients. Ornua Foods is responsible for the marketing and sales of Ornua's consumer brands including Ireland's most successful food export: Kerrygold, as well as Kerrygold Dubliner, Pilgrims Choice, Forto and BEO milk powders. Markets are served by production facilities in Ireland, Germany and the UK and by in-market Sales & Marketing Teams in Asia, Germany, Ireland, MEA, Poland, Spain, rest of Europe and North and Latin America.

Ornua Ingredients is responsible for the procurement of Irish and non-Irish dairy products, for the sale of dairy ingredients to food manufacturing and foodservice customers across the world, and for managing volatility through de-risking and trading strategies. The business is supported by production facilities in the UK, Spain, the USA, Saudi Arabia, and by in-market teams in Africa and the Middle East.

Our Values

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, allowing us to maximise our impact in the communities in which Ornua operate.

Our Values - *Achieve great things together; Be our true selves; Make it happen; Seek and embrace new ideas; and Show you care* - represent what Ornua stands for and what is important to us and 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.

Path to Prosper 2027

Path to Prosper is Ornua's five-year corporate strategy, focused on delivering three core missions:

- Ornua will sustainably maximise the profitability of its brands by focusing on a consumer first strategy that will deliver scale, premiumisation and increased returns for Irish dairy farming families.
- Ornua will leverage customer-led core competencies in specific geographic markets with a clear focus on sustainable, profitable operations to generate additional value.
- Ornua will protect and support the sustainable growth and profitability of our Member Co-operatives and commodities business by leveraging our global scale, positive relationships and expertise in international markets.

In turn, our customers, our people, and the communities Ornua serves, can continue to grow and prosper.

Environment, Social & Governance (ESG)

In 2024, Ornua continued the work of reducing the impact the business has on the environment and improving the sustainability of our supply chain. Ornua's Responsible Sourcing Programme was launched in 2024, and this will ensure that 85% of the business's dairy, packaging and ingredients are responsibly sourced.

Ornua's Environmental, Social and Governance (ESG) strategy, Common Ground was launched in 2024. This ESG strategy focuses on three pillars of Planet, People, and Products. These pillars allow Ornua, colleagues, and our value chain to focus on sustainability. In 2025, Ornua will continue to ensure the ESG strategy is implemented at all levels of the business.

Protecting People

Policies and Initiatives

As a co-operative, our partnerships and people are key to delivering our business strategy and creating value for our Member Co-operatives. Ornua is powered by a team of over 2,800 people, representing 69 nationalities worldwide, working as one team to ensure the principles of Ornua's co-operative ethos are to the fore in all that we do. Ornua has a number of policies and initiatives 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 setting 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 ensuring 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 Ornua 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 Ornua sites.

The Diversity & Belonging team are responsible for fostering a culture where everybody can bring their whole selves to work and maximises inclusion in our workplace.

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

Recruitment Process

Ornua 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. If we sponsor visas/work permits, we follow due immigration process in each jurisdiction and ensure salaries for such roles are at fair market rate.

Reward Process

Ornua has rolled out career levels for employees across the organisation which allows us to benchmark roles and ensure a fair market rate is paid.

External Accreditations

Ornua received the following accreditations for activities implemented in Ireland to protect Ornua employees and pursue ethical business practices.

Business Working Responsibly Mark (Business in The Community Ireland)

Ornua has retained the Business Working Responsibly Mark through Business in The Community Ireland. Ornua first obtained the award in 2019 and the accreditation is third party verified by the National Standards Authority of Ireland (NSAI). This award showcases Ornua's commitment to Corporate Social Responsibility Governance, Workplace, Marketplace, Environment and Community.

In 2024, Ornua took part in the Bord Bia and Business in The Community Ireland workshop on Human Rights Due Diligence, allowing us to better understand how Ornua can protect Human Rights across our business and supply base.

IBEC KeepWell Mark

Ornua has once again been recognised as a leading employer in wellbeing through the IBEC KeepWell Mark, an Irish accreditation designed to acknowledge and celebrate companies at the forefront in promoting corporate wellness within company policies.

Managing Our Supply Chain

Our Supply Chain

Ornua's extensive supply chain encompasses more than 2,500 suppliers across various sectors, including dairy and non-dairy ingredients, as well as freight forwarders and facility management companies.

Ornua acknowledges that the wide range of products, sourcing locations, markets, and regulations associated with our purchases and distribution can pose potential risks.

Consequently, we are proactively enhancing our strategies and frameworks to assess risk within our supply chain. Ornua has already established and improved several policies (as detailed below) in response to identified risks, and remains committed to further refining and advancing our approach to ensure responsible and ethical conduct by our supply base.

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 Ornua standards and specifications and are committed to values of conduct that are compatible with our own.

Ornua has implemented the following policies to ensure our suppliers meet these standards:

Our Business Partner Code of Conduct ("Code") reflects Ornua's commitment to operate responsibly and uphold human rights. The Code contains fundamental standards in relation to no child or forced labour, provision of safe places of work and decent working conditions, protection of the environment, and ethical business conduct (anti-bribery and corruption). The purpose of this code is to ensure these standards are upheld by suppliers of goods and services to Ornua. Since 2022, Ornua's standard contracting terms require all suppliers to adhere to this code.

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. The majority of Ornua's business partners/counterparties are also rescreened periodically.

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

In 2024, we continued to focus on the development of the Group Responsible Sourcing Framework which includes relevant metrics and policies for the procurement of products in our priority raw materials including dairy, soy, palm oil, and fibre-based packaging.

At the start of 2024, the Ornua Executive approved a deforestation policy which works towards increasing the sustainability of palm oil and soy, specifically mentioning the importance of reducing the risk of human rights violations within the supply chain.

Independent Platforms

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

A number of Ornua's manufacturing facilities in Ireland, the UK and US 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 UK laws. Ornua also uses the SEDEX platform to help assess and verify the ethical standards of our suppliers, and to collaborate with both suppliers and customers on our ethical and responsible business practices. During 2024 two of Ornua's five North American sites were SMETA audited. Both sites achieved commendable scores with zero non-conformances.

Ornua is also in the process of transitioning to a shared group wide supplier management system called 'Foods Connected'. This process is now live across Ornua sites in the UK, Ireland, Spain, Germany & the USA. The system will complete 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 by the supplier in relation to modern slavery risks.

Ornua's business in Germany is accredited by the ZNU-Standard for Sustainable Management. This standard supports companies in becoming more sustainable, demands continuous improvement and integrates all three dimensions of environmental, economic and social issues, with a strong focus on protecting human rights.

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. The SAI envisions a sustainable, thriving, and resilient agricultural sector that protects the earth's resources, human rights and animal welfare.



Reporting

Reporting Channels

Ornua 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, the Ornua **Whistleblowing Policy** provides a framework for employees and suppliers to report concerns about illegal, dangerous or unethical conduct within Ornua, without fear of reprisal.

An independent global reporting service is available for employees to raise concerns, on an anonymous basis if necessary. All whistleblowing incidents are reviewed by Ornua's audit committee, fully investigated, and appropriately actioned. In 2024, there were no reports received relating to modern slavery risks or human trafficking.



Due Diligence and Risk Assessment

Organisational Risk Governance in Ornua

Ornua’s values lead our ethos around organisational risk management; building a positive risk culture supported by a formal risk management policy and processes. Ornua’s risk management framework has been designed using the Three Lines of Defence Model (Institute of Internal Auditors, 2020), which sets out how responsibilities are divided in relation to managing and monitoring risk across the Group.

Ornua’s Risk Management Policy requires Ornua to implement a framework for identifying, assessing, and managing risk, at all levels of the business, to ensure it remains alert to the ever-changing environment in which it operates. This framework underpins a common language and approach to risk management and facilitates the early identification and assessment of risk, such as modern slavery and human rights risks.

By focusing on the proactive identification of Ornua’s modern slavery and human rights risks, the framework enables Ornua to consider the appropriate mitigation steps or management actions.

Ornua recognises our profile of modern slavery and human rights risks are not static and we endeavour to evolve in line with changes in operations, supply chain and the macro environment.

The Enterprise Risk Management Framework both aligns and enhances the already established human resource policies and procedures, property management and health and safety programmes which ensure an appropriate working environment for direct/ indirect employees and contractors.

Our Progress in 2024

Focus Areas	KPIs Achieved
Awareness - Raise awareness amongst employees on the topic of modern slavery and human trafficking.	To mark World Anti-Slavery Day on October 18, Ornua ran a global week-long awareness campaign to create a greater understanding of the organisational commitment and individual roles in combatting modern slavery and human trafficking.
Environmental Social and Governance Strategy (ESG strategy)	In 2024, Ornua embedded its updated ESG strategy, focusing on the topics of Environment, Social, Governance, and Responsible Supply Chain.
Responsible Sourcing Framework	Adoption of the Responsible Sourcing Framework with the aim of ensuring that 85% of Ornua’s dairy, packaging and ingredients are responsibly sourced.
Risk Management Framework	Ornua’s Risk Management Framework further embedded in activities, enabling the holistic management of modern slavery risks.

Approval

The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved on 22nd May 2025 by the Board of Directors of Ornua Co-operative Limited. It constitutes the modern slavery and human trafficking statement of Ornua's Irish and UK legal entities – Ornua Co-operative Limited, Ornua Foods, (UK) Limited, Ornua Ingredients Europe (UK) Limited, The Irish Dairy Board (UK) Limited and Ornua Nutrition Ingredients UK Limited in respect of the financial year ended 28 December 2024 and is signed by a Director of Ornua Co-operative Limited.



Kevin Toland

Chair
Ornua Co-operative Limited