

FRULACT – SERVIÇOS PARTILHADOS S. A.

Modern Slavery Transparency Report

Our commitment to human rights continues to be a priority for FRULACT – SERVIÇOS PARTILHADOS S. A. (the reporting entity) and our international business (“FRULACT” or “we”) as we strive to ensure that we source responsibly and work to prevent modern slavery, forced labour, child labour, and human trafficking (collectively, “Modern Slavery”) throughout our organization and in our supply chain. We take this commitment seriously and are opposed to Modern Slavery in all its forms.

Modern Slavery can be found in almost every country in the world. Vulnerable persons such as children, women, workers who have traditionally been discriminated against, migrant workers, workers with uncertain immigration status, and rural workers are the most at risk of being exploited by Modern Slavery.

Some examples of Modern Slavery include, but are not limited to:

- human trafficking;
- bonded labour or Debt bondage
- exploitive labour contracts;
- sale or exploitation of people;
- unlawful recruitment and use of child soldiers
- domestic servitude
- forced labor in prisons; and
- coercion or deception in employment.

We recognize that Modern Slavery is a critical global issue, and we have initiated engagement with our suppliers to provide support and maintain the safety and well-being of our employees and partners.

In the FRULACT – SERVIÇOS PARTILHADOS S. A. Modern Slavery Transparency Report (this “Report”), which is made pursuant to the Canada Fighting Against Forced Labour and Child Labour in Supply Chain Act 2023 FRULACT, as the reporting entity, is disclosing, on behalf of ourselves and our subsidiary Frulact Canada, Inc., our efforts taken during the last financial year ending December 31, 2023 to ensure that Modern Slavery does not occur in our supply chain or in any part of our business. FRULACT and its subsidiary share policies prohibiting Modern Slavery, and supporting processes further described in this Report.

Company Structure

FRULACT is a business group, established in 1987, positioned as a top-ranked innovative company in the supply of added value ingredients for the food and beverage industry, namely fruit and vegetable preparations for dairy, ice-cream, desserts, beverages, flavours and plant-based alternatives. The Frulact has a global presence employing 859 people, with 12 operating facilities across Europe, Africa and North America. We have an Homologation Process, described below, to verify if they accomplish with our principles, including our position about Human Rights, and we refuse to work with business partners and suppliers who don’t confirm that follow our principles.

Risk Assessment and Due Diligence Process

It is our policy not to contact with any organization and/or client, third-party or other person who is engaged in any aspect of Modern Slavery. While historically we have not undertaken any due diligence with respect to our supply chain, we intend to take a risk-based approach to our due diligence efforts. This will require us to endeavor to include the entirety of our supply chain, while paying greater attention to those suppliers who are deemed a heightened risk for operational or supply chain links to Modern Slavery.

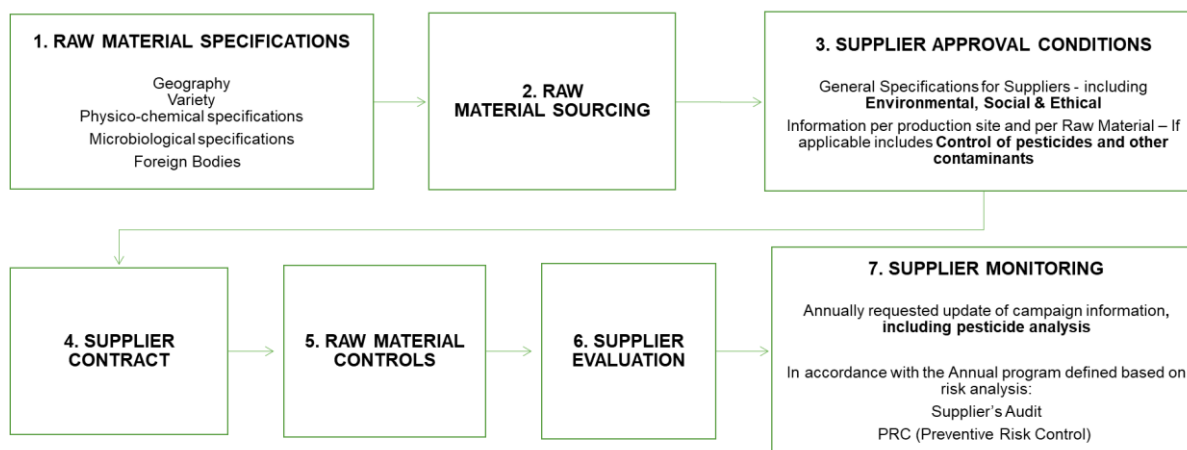
Frulact intends to take the following actions to identify the risk of Modern Slavery within our business. We intend to assess any risks associated with Modern Slavery which could be associated with our supply chain.

We recognize that in certain high-risk industries, there is a greater risk of Modern Slavery, and we have identified that there is a higher risk of Modern Slavery practices being followed in the sections of our supply chain that involve the production of sugarcane, fruit and vegetable procurement. In line with our risk-based approach, we intend to place a particular emphasis on our suppliers in these industries and where necessary engage each of these suppliers in a corrective action process.

It is our hope that by undertaking an ongoing engagement with our suppliers it will enable us to try and continuously improve our due diligence program.

Supplier Homologation Process

The Homologation Process occurs according to the following scheme:



During task 3 – supplier Approval conditions, the supplier

- must be aware about our **Code of Conduct and Ethics**, including the following principle:

Promotion of Human Rights

The Commitment of the Frulact Group

We are committed to ensuring compliance with the Universal Declaration of Human Rights, namely:

- condemnation of slave or forced labour and human trafficking;
- condemnation of child labour;
- freedom of association;
- non-discrimination by sex, race, religion, economic, health or other situation
- condemnation of situations of any kind of harassment or abuse: sexual, psychological or verbal.

We recognise that our external stakeholders, namely suppliers and customers, are independent entities of the Frulact Group, however, we promote that they too share these fundamental values of respect for the human being and for planet. The non-respect for these values, even by an external stakeholder, may affect the reputation of the Frulact Group and the level of confidence of the market.

The Commitment of Our Collaborators

We commit ourselves to reporting all situations where we identify a lack of respect by any human being or the planet, no matter who does it. If necessary, we will act immediately to ensure the integrity of individuals and plane

- must be aware about our **Supplier's Code of Conduct and Ethics**, including the following principle

Respect for People

Frulact Group is committed to ensuring compliance with the Universal Declaration of Human Rights in any operation connected with our activity. Our partners should demonstrate that they are fully committed to guaranteeing:

- **Health and Safety:** a Working Environment according to local laws including providing safety equipment and guaranteeing the accomplishment of limited working hours as defined by the law;
- condemnation of slave or forced labor, child labor and human trafficking;
- a non-discriminatory environment including in hiring, compensation, access to training, promotion, disciplinary process, termination or retirement for all employees;
- condemnation of situations of any kind of harassment or abuse: sexual, physical, psychological or verbal
- sign our General Specifications document that includes:

The supplier should read and be informed about our code of conduct and ethics.

The supplier must be committed to ensure the compliance with the Universal Declaration of Human Right, and local labor legislation and regulation, namely:

- condemnation of slave or forced labour and human trafficking;
- condemnation of child labour;
- freedom of association
- non-discrimination by sex, race, religion, economic, health or other situation;
- condemnation of situations of any kind of harassment or abuse: sexual, psychological or verbal; Supplier must also be able to accomplish with:
- guarantee employees security;
- guarantee the accomplishment of limited working hours defined by the law;
- implement good practices in the evaluation's process and in disciplinary's process;
- have a management and remuneration system implemented for all employees.

Audits

Frulact assesses the suppliers annually.

Every year, Frulact's defines the suppliers audit plan according with a risk analysis. Audits consist of a review of documents and visits to suppliers' facilities.

Audits checklists include social topics.

Frulact's Policies

We have a number of appropriate policies in place that underpin our growing commitment to ensure that there is no Modern Slavery in our supply chains or in any part of our business, and we expect our employees, suppliers and partners to adhere to such policies. These policies are reviewed and updated periodically to reflect any change in risk profiles, international guidance or local law requirements. Every time we review our Human Right policy we guarantee that all our collaborators know the difference promoted and be aware to implement the good practices.

We have the following documents to share our principles:

Frulact's Code of Ethics and Conduct

Our Code of Business Conduct and Ethics requires our employees, officers and directors to lawfully conduct our business with integrity. It specifically addresses respect for human rights and requires employees to uphold the FRULACT Human Rights Policy.

In addition, the standards of conduct under the Code of Business Conduct and Ethics include equal employment opportunity, providing a safe and healthy work environment, equitable treatment of employees and compliance with laws, rules and regulations applicable to FRULACT.

We interpret these standards broadly and require ethical behavior and compliance with the Code of Business Conduct and Ethics to ensure that Modern Slavery does not exist in our supply chain. Employees are required to promptly report any perceived violations of the law or the Code of Business Conduct and Ethics. We distribute the Code of Business Conduct and Ethics to each of our employees, officers and directors, and make it available on our corporate website at the following link: [website].

Frulact's Supplier Code of Conduct

We expect our suppliers to comply with all legal requirements of the country or countries in which they are doing business, including laws regarding Modern Slavery. Just as our Code of Business Conduct and Ethics sets high standards for our employees, officers, and directors, suppliers will be expected to abide by our Supplier Code of Conduct, which covers areas including forced labor, child labor, abuse of labor, wages, hours, freedom of association and collective bargaining, and discrimination, among others.

We encourage our suppliers to work toward implementing best practices and to exceed the requirements of our Supplier Code of Conduct. Adherence to the Supplier Code of Conduct is a contractual requirement for the majority of our supplier contracts, and we continue to increase incorporation of such requirement into our contracts as our contracts with

suppliers turn over. The FRULACT Supplier Code of Conduct is found in the website.

Training

To ensure a proper understanding of the risks of Modern Slavery in our supply chains and our business, we ensure that all collaborators receive global training covering: “Code of Ethics and Conduct”.

Every time we make changes on our Ethical Policy and Governance, we promote a training to all our collaborators. For new collaborators we have a specific training that is included on the onboarding process.

We preview to implement in 2024 a specific training to employees whose work relates to supply chain management (including those in procurement and the legal department) are provided with training on Supplier Code of Ethic, including reference to Social and Ethical risks. This training explains what our principles about Human Rights in the Supply Chain are, explains how to mitigate the risks within the supply chain and how to deal with suppliers in the event of an issue

ESG Certifications

Frulact is a member of Sedex and keeps information about the company up to date. Whenever requested by a customer or supplier, Frulact is subject to audits.

Frulact is certified by Ecovadis.

Sustainable Procurement Policy

It is Frulact’s intention to influence stakeholders to reduce their impact and identify key suppliers to develop sustainability specific projects.

We define that as a sustainable procurement strategy we intend to

***“ Promote Frulact’s competitiveness and sustainability through the supply chain, by actively procuring :
the best quality products
at the best possible prices,
while ensuring availability
at the highest ethical standards ”***

The Sustainable Procurement Policy has been defined by our Global Head of Procurement and our Global Head of Sustainability.

This policy applies to the entire group, our Procurement team is centralized, consolidating functions for the entire group

Policy revisions should be undertaken whenever we identify significant changes in the value chain or within the organization

Whistleblowing System

Frulact encourages stakeholders and all collaborators to, without fear of reprisal, report any violations or perceived violations of the law, the Code of Ethics and Conduct, the Supplier Code of Conduct and raise any other questions or grievances they have.

During 2023 on our Code of Ethics and Conduct we refer that:

It is important that the reporting is done in a timely and clear and transparent manner, trying to anticipate and clarify any doubts that may arise and to reduce the impact of the non-compliance. To ensure that everyone has the opportunity to clarify their conduct and to clarify their motivation, they should clearly identify all the actors involved.

Situations should preferably be reported via the email address:
conduct.committee@frulact.com.

Or by mail (to report a situation anonymously) to:
Global Head of Frupeople
589 Rua do Outeiro
4475-150 Gemunde - Maia
Portugal

Frulact is implementing a whistleblowing system that provides an internal reporting channel (through the Frulact website) for whistleblowing, enabling all employees and stakeholders, anonymously, if necessary, to report of infractions or suspected misconduct, such as fraud, corruption, or illegal activities within the organization.

Consultation

The same policies, practices, approaches and procedures regarding the prevention of and response to Modern Slavery apply to our subsidiaries, both domestic and international. We have communicated and consulted with each of the relevant entities that we own and control in the development of this Report and our approach to Modern Slavery, noting they are subject to the same policies and processes as set out in this Report. In the preparation of this Report, we also consulted with our subsidiary, FRULACT Canada, Inc., to ensure that this Report satisfies all the mandatory criteria of its reporting jurisdiction.

Approval

This Report is made pursuant to section 11 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. It constitutes FRULACT's Modern Slavery Report for the year ended December 31, 2023. This Report was approved unanimously by the Board of Directors of FRULACT.

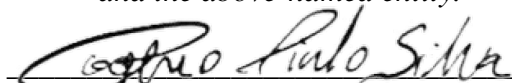


Name: Luís António Peixoto Amaral

Title: Director

Date: May 31, 2024

**I have the authority to bind FRULACT – SERVIÇOS PARTILHADOS S. A. and the above-named entity.*



Name: Rogério Pinho da Silva

Title: Director

Date: May 31, 2024

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Attestation

In accordance with the requirements of the Canada's Fight Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for FRULACT – SERVIÇOS PARTILHADOS S. A. and its subsidiary listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of that act, for the reporting year listed above.

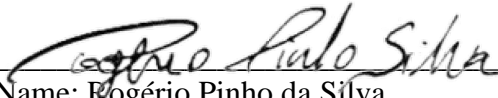


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