

## **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.

Frulact is committed to treating our own employees and people who are connected to our business with fundamental dignity and respect; and this includes a commitment to their freedom to choose employment. We do not tolerate any form of Modern Slavery.

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

- human trafficking;
- child labour
- 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.

At Frulact, we understand the responsibility in these efforts and are committed to expanding our work to understand and address modern slavery risks that may arise in the course of our business.

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 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 2024 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, 2024 to ensure that Modern Slavery does not occur in our supply chain or in any part of our business. Frulact and its subsidiary share the same core business operations and supply chains, 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. Frulact has a global presence employing more than 800 people, with 9 operating facilities across Europe, Africa and North America. We have a Homologation Process, described below, to verify if our suppliers adhere to our principles, including our position on Human Rights. We work with suppliers who accept our Supplier Code of Conduct, in which we set out our ethical principles.

## **Risk Assessment and Due Diligence Process**

It is our policy not to work with any organization and/or client, third-party or other person who is engaged in any aspect of Modern Slavery.

In 2024 we undertook a Double Materiality analysis in accordance with CSRD (Corporate Sustainable Reporting Directive). We also undertook an Impact Risk and Opportunity evaluation, where Stakeholders, both internal and external, are consulted to gather insights and inputs to enhance the evaluation process. Subsequently, the results of impact and financial materiality assessments are consolidated, and the findings are validated.

For the Topic S2 – Workers in the Value Chain – we had identified a total of 14 Impacts, Risks and Opportunities associated with the sub-topics: Child Labour, Forced Labour, Adequate Wages, Health & Safety, Social Dialogue, Working time, Work-life-balance, Diversity, Gender Equality and Equal Pay for Work of Equal Value, Measures Against Violence And Harassment In The Workplace.

Frulact classified with significant impact the following risks:

- Legal sanctions, reputation damage, and potential work or client boycotts due to child labour in the value chain, resulting in loss of revenue.
- Legal and reputational risks due to health and safety incidents of upstream workers

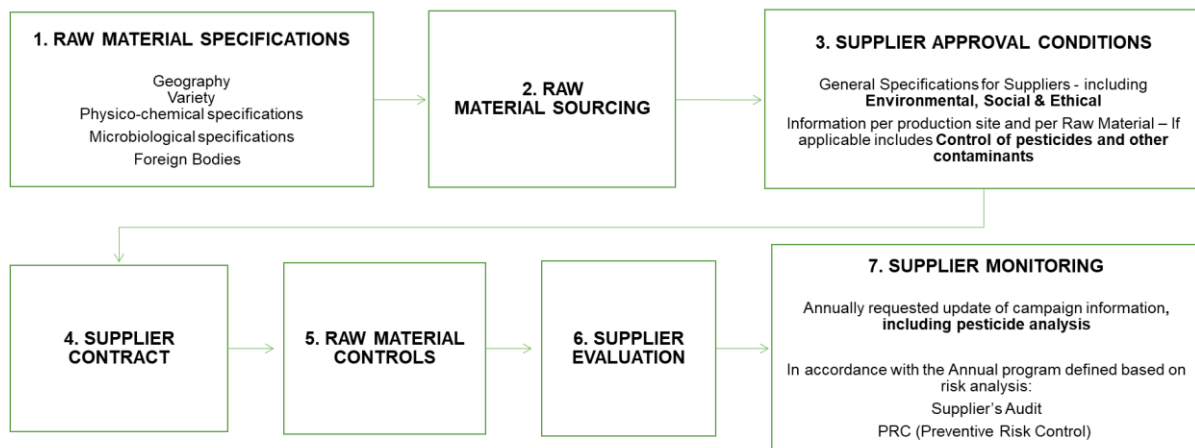
This will require us to endeavor to include the entirety of our supply chain, while paying greater attention to those suppliers who are deemed at a heightened risk for operational or supply chain links to Modern Slavery.

We intend to ensure that due diligence is carried out by asking our suppliers to provide information on their own policies regarding their sourcing of goods and services, as well as their employment practices. In 2025 we are implementing TraceGains: The World's Only Networked Ingredients Marketplace, the platform will help us to define the priorities for our Due Dilligence program.

## **Supplier Homologation Process**

The homologation Process represents a key milestone, demonstrating the robustness, reliability of our value chain.

The Homologation Process occurs according to the following scheme:



During task 3 above – supplier Approval conditions, the supplier is made aware of our **Code of Ethics and Conduct**, including the following principle:

## Promotion of Human Rights

### United Nations Global Compact

Frulact became a participant in the United Nations Global Compact (“UN Global Compact”), the world's largest corporate sustainability initiative.

At Frulact, we are committed to aligning our operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment, and anti-corruption. By joining this global movement, we are reinforcing our dedication to responsible business practices and sustainable growth.

Our participation in the UN Global Compact is a testament to our ongoing efforts to make a positive impact on the world. We believe that by working together with businesses and stakeholders globally, we can contribute to a more sustainable and inclusive future for all.

We look forward to continuing our work to create value not just for Frulact, but for society as a whole.

### The Frulact Commitment

Our Global Human Rights Principles reflect our dedication to upholding fundamental human rights and honoring the dignity of everyone involved with our business worldwide. We strive to ensure that the products and services we offer are created in a manner that respects human rights, including the right to freely choose employment.

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.

These principles are informed by leading international standards and frameworks developed by the United Nations (UN) and the International Labour Organization (ILO).

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

The supplier must be aware about our **Supplier's Code of Conduct**, including the following principles:

### **Respect for People**

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

- 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 has read and been informed about our Code of Ethics and Conduct and our Supplier's Code of Conduct.

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.

In 2024 Frulact implemented TraceGains: The World's Only Networked Ingredients Marketplace, It reflects the organization's ongoing commitment to excellence in technological innovation and operational integrity.

The Trace Gains platform allows a complete homologation process, having fulfilled all required technical, functional, and regulatory criteria.

## **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.

Audit checklists include social topics like having a Code of conduct and compliance with Human rights principles.

## **Frulact Policies**

Our commitment to identify and manage the risks of Modern Slavery within our business and supply chains is grounded in our policies. These policies express our values and expectations, setting a high standard for ourselves, our suppliers, and our selling partners, clearly stating that we have zero tolerance for 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 ensure that all our collaborators are made aware of the updates and act to implement the good practices.

We have the following documents to share our principles:

### **Frulact's Code of Ethics and Conduct**

Our Code of Ethics and Conduct 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 Ethics and Conduct 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 Ethics and Conduct 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 Ethics and Conduct. We distribute the Code of Ethics and Conduct to each of our employees, officers and directors, and make it available on our corporate website at the following link:

<https://frulact.com/our-group/corporate-ethics/>

## **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 Ethics and Conduct sets high standards for our employees, officers, and directors, suppliers are expected to abide by our Supplier's 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's Code of Conduct. Adherence to the Supplier's 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.

Frulact has implemented a procedure whereby an explicit reference to the Supplier Code of Conduct is included in the purchase orders ("PO") issued by Frulact and accepted by the supplier. This reference establishes that, by accepting the PO, the supplier acknowledges and fully agrees to the terms and principles set forth in the aforementioned Code.

The supplier's acceptance of the PO formally constitutes adherence to the ethical, social, and environmental conduct guidelines required by Frulact, thereby incorporating these requirements into the contractual conditions governing the commercial relationship.

This practice aims to ensure the alignment of suppliers with Frulact's values and commitments, promoting compliance and integrity throughout the supply chain. We emphasize that this measure is intended to ensure conformity with our ethical, social, and environmental standards, reinforcing transparency and accountability in business relationships.

Supplier's Code of Conduct of Frulact is found on the website at <https://frulact.com/our-group/corporate-ethics/>

## **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".

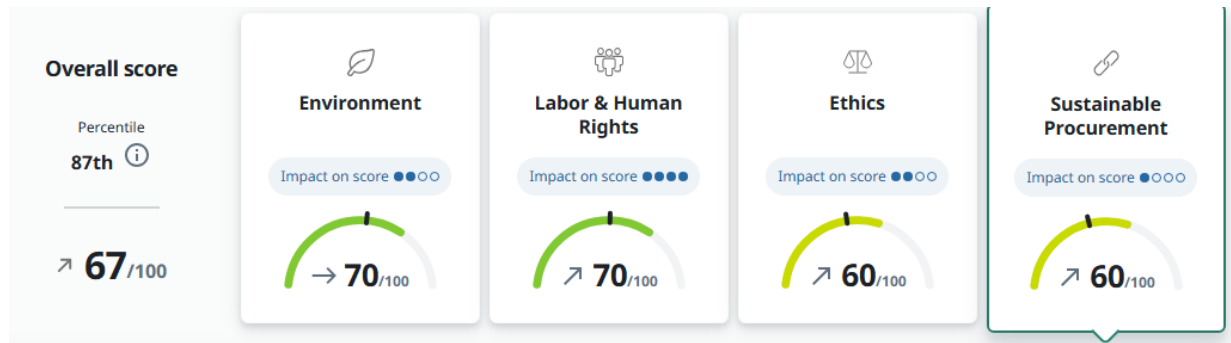
Every time we make changes to our Ethical Policy and Governance, we promote training to all our collaborators. For new collaborators we have a specific training procedure that is included on the onboarding process.

We intend to implement in 2025 specific training for employees whose work relates to supply chain management (including those in procurement and the legal department) to provide them with training on Supplier Code of Ethic, including reference to Social and Ethical risks. This training will explain what our principles about Human Rights in the Supply Chain are, 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 registered at Sedex: Sustainable business and supply chain solutions and keeps information about the company up to date based on a self-assessment questionnaire. Whenever requested by a customer or supplier, Frulact is subject to SMETA audits.

Frulact is registered by Ecovadis, with the following evaluation:



Ecovadis identified as our strengths:

- Integration of social and environmental clauses into suppliers' contracts.
- Supplier sustainability code of conduct in place
- Endorsement of the UN Global Compact

## 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 all of Frulact. Our Procurement team is centralized, consolidating functions for all of Frulact.

Revisions are 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's Code of Conduct (together sometimes referred to as the “Codes”) and raise any other questions

or grievances they have. We also have appropriate systems in place to protect whistle-blowers via the anonymous hotline.

One of the most important ways to do business with integrity is to speak up by asking questions and reporting concerns about situations that may violate either of the Codes or an associated policy.

Our Whistleblowing System is the main method to employees and stakeholders reports any violations or suspected violations of either of the Codes and other associated Frulact policies, or any behavior that does not comply with applicable laws. The Codes also clearly sets out our no-retaliation policy, which is designed to enable employees to raise good faith issues in a safe environment without fear of retaliation.

## **Newsletter**

The internal newsletter has been used as a strategic communication tool to disseminate content related to ethics, integrity, corruption prevention and topics related to the defense of human rights. Through this tool, Frulact promotes an organizational culture based on ethical principles, reinforcing employees' knowledge of good practices, internal standards and initiatives in the area of regulatory compliance. This approach helps to keep ethics and compliance issues present in the organization's day-to-day activities, encouraging individual and collective responsibility in the fight against corruption and modern slavery.

## **Media**

Reinforcing its commitment to integrity, transparency and corruption prevention, Frulact has developed a series of awareness-raising actions aimed at employees, partners and the general public. These initiatives were promoted through Frulact's internal and external communication channels, with the aim of raising awareness of the importance of ethics in business and the role of each individual in building an honest and responsible organizational culture. With this action, Frulact reaffirms its alignment with international anti-corruption principles as well as modern slavery principles and its ongoing commitment to sustainable and ethical business practices.

Some public examples:

Endorsement on United Nations Global Compact

<https://www.linkedin.com/feed/update/urn:li:activity:7219653637432623104>

Linkedin publication on International Anti-Corruption Day

<https://www.linkedin.com/feed/update/urn:li:activity:7271925206091251713>

Linkedin publication on International Day for the Remembrance of the Slave Trade and its Abolition

<https://www.linkedin.com/feed/update/urn:li:activity:7232673063748698113>

We also joined South Africa Women Month

<https://www.linkedin.com/feed/update/urn:li:activity:7240301601934987266>

## **Remedies**

In the event of confirmed non-compliance, notwithstanding the applicable criminal and civil

proceedings, internal censure proceedings may be initiated in accordance with Frulact's procedures:

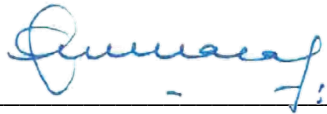
- the necessary measures are taken to verify the implementation of corrective and preventive actions to ensure that it doesn't happen again;
- measures with an impact on commercial and/or partnership relations with external stakeholders.

## 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 of 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, 2024. This Report was approved unanimously by the Board of Directors of FRULACT – SERVIÇOS PARTILHADOS S.A. and Frulact Canada, Inc.***

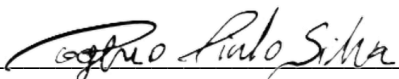


Name: Luís António Peixoto Amaral

Title: Director

Date: May 31, 2025

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



Name: Rogério Pinho da Silva

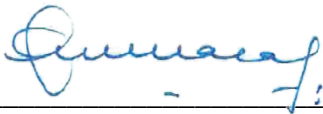
Title: Director

Date: May 31, 2025

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

## 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.**



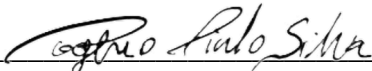
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Title: Director

Date: May 31, 2025

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