# DANONE UK MODERN SLAVERY STATEMENT

2024-2025



# **MODERN SLAVERY STATEMENT**



This statement has been published in accordance with the Modern Slavery Act 2015.

It outlines the actions taken by Danone and its UK businesses during the 2024–2025 financial year\* to prevent slavery, servitude, forced or compulsory labour, and human trafficking within our operations and supply chain.

Danone's in-scope UK businesses are:

- Nutricia Ltd
- SHS International Ltd
- Alpro UK Ltd

If you have any comments or queries, please contact: Pressuk.irl@danone.com



# **FOREWORD**

# WHAT IS MODERN SLAVERY

Modern slavery is **grave violation of fundamental human rights**. It manifests in various forms, including slavery, servitude, forced or compulsory labour and human trafficking.

Modern slavery encompasses two main elements: **forced labour** and **forced marriage**. These involve situations where individuals are exploited and unable to refuse or leave due to threats, violence, coercion, deception, or abuse of power.

The International Labour Organisation defines forced labour as "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily." The ILO estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy.

At Danone UK & Ireland, we have a zero-tolerance approach to modern slavery. There is no place for forced labour in any part of our operations or supply chains. We believe that meaningful progress requires collective action—businesses, governments, and civil society must work together to combat and ultimately eradicate modern slavery.

This statement outlines the steps we are taking to prevent modern slavery across our business operations and supply chains.





# **STATEMENT FROM JAMES MAYER**

# PRESIDENT OF DANONE UK & IRELAND

Our commitment to human rights is fundamental to how we operate in Danone UK. We strive to be a business that is a force for good - delivering a meaningful, lasting impact and bringing health, through food, to as many people as possible. It is a belief that is embedded in every decision we make as a business in the UK & Ireland. This approach is demonstrated through our Danone Impact Journey impact report.

Launched in 2023, our Danone Impact Journey is centred around three core pillars: Health, Nature and People & Communities. It grounds our priorities as a certified B Corp and Société à Mission and ensures that our impact is embedded into our business, management practices and performance indicators.

Central to our Danone Impact Journey is our commitment to championing a renewed social contract, cultivating a prosperous and inclusive ecosystem, upholding human rights, and driving meaningful social progress.

Since its launch, we have actively engaged our suppliers and key customers across the UK and Ireland by sharing our core priorities and, last year, we published our inaugural UK & Ireland Impact Report, highlighting the progress we've made and challenges we've encountered as we continue our journey toward our goals.

As an active member of the Consumer Goods Forum (CGF)'s Human Rights Coalition, Danone is committed to ending forced labour within our own operations and our supply chain. In the last 12 months, we have made meaningful progress in advancing our human rights and modern slavery agenda, including the formal launch of our Human Rights Due Diligence (HRDD) journey.

In 2024, we established a dedicated Human Rights Governance Taskforce and completed self-assessments across all UK & Ireland operations to better identify and address potential human rights risks. To embed this commitment across the organisation, we also prioritised capability building and internal engagement—ensuring both employees and external workers understand their role in upholding human rights. This will be further reinforced in 2025 through the rollout of a globally developed human rights e-learning module, which will be mandatory for all employees in the UK and Ireland.

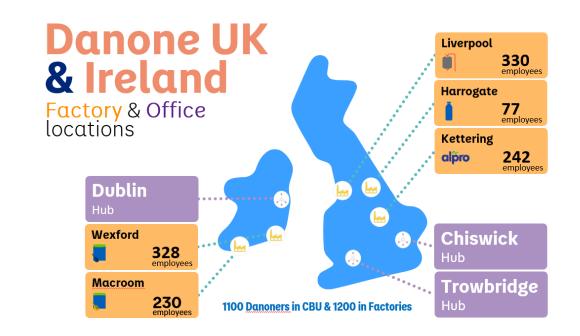
As a certified Living Wage Employer, we continue to ensure that all directly employed staff in the UK and Ireland receive a wage that meets the real cost of living. This commitment is a cornerstone of our approach to preventing exploitation and promoting decent work.

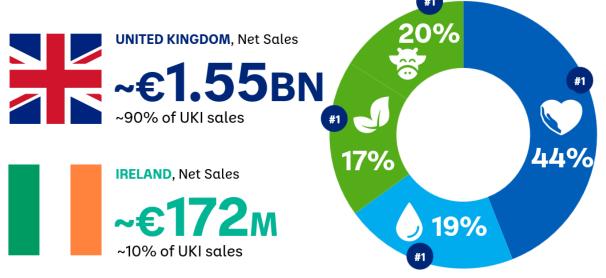
We remain proud of our progress to date and are committed and consistent in delivering incremental improvements year after year. Our dedication to human rights remains unchanged, and we will continue to collaborate with our stakeholders, and others to ensure that our supply chains are free from forced labour and exploitation.

Only by working together can we create a future where everyone is treated with dignity and respect.

# **DANONE IN UK & IRELAND**











# **DANONE'S APPROACH TO HUMAN RIGHTS**

Danone's human rights due diligence is founded upon a commitment to upholding human rights as established in the following internationally recognized standards and guidelines:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business & Human Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- The ten principles of United Nations Global Compact
- UN Women's Empowerment Principles
- The Children's Rights and Business Principles
- The Global LGBTI Standards for Business
- The FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests (VGGT)

Where local law and international human rights standards differ, we will follow the higher standard. Where they are in conflict, we will adhere to local law, while seeking ways to respect international human rights to the greatest extent possible















# **DANONE COMMITMENTS TO UPHOLDING HUMAN RIGHTS**

Danone is committed to upholding human rights throughout our value chain, with a particular focus on the most significant potential human rights issues associated with our sector of activity. Our commitments are formalised in Danone Human Rights Policy and detailed in Danone Social Principles, focusing on the most significant issues.

- 01 | No child labor: children exploitation is prohibited.
- 02 | No forced labor, slavery, and human trafficking.
- 1 No discrimination: all workers are treated equally and with respect and dignity.
- 04 | No harassment and abuse.
- **05** | Freedom of association and the right to collective bargaining are granted.
- 06 | Health, safety, and wellbeing at work are ensured by the employer.
- 08 | Workers are paid a fair wage.
- 09 | Diversity, equity and inclusion are promoted.
- 10 | Land rights of communities and indigenous people are respected.





# **DANONE KEY POLICIES**

### **HUMAN RIGHTS POLICY**

Our Human Rights Policy reaffirms our commitment to respect and strengthen human rights both in our own workforce and our value chain. The policy clearly articulates the human rights priorities we're focusing on.

### These are:

- Ending exploitation. This involves prohibiting child and forced labour, prohibiting harassment and abuse and ensuring reasonable working hours.
- Decent work. This means granting a decent wage and at least the applicable legal minimum or standard pay, committing to safe and healthy working conditions, and granting freedom of association and the right to collective bargaining. It also means ensuring that all workers are treated equally with respect and dignity and fostering a positive culture towards diversity and inclusion.
- Respecting people in communities impacted by our activities. This involves respecting the land rights of communities and Indigenous peoples and respecting their right to a healthy environment and healthy nutrition. For example, not negatively impacting their access to water.

The Human Rights Policy also elaborates on our responsibilities as a company, and the expectations we have of our business partners. It sets out our approach for implementing human rights due diligence, with our external workforce identified as a key priority in our own operations scope.

### DANONE SUSTAINABILITY PRINCIPLES (DSP)

In 2022, we updated Danone's Sustainability Principles (DSP) for Business Partners and for Danoners which is applicable to our full value chain, including our own operations. The DSP sets out the clear expectations we have of our suppliers and employees on social, environmental and ethical issues.



### DANONE SUSTAINABLE SOURCING POLICY (SSP)

In 2024, Danone launched the Sustainable Sourcing Policy (SSP), which will gradually be rolled out in the coming years to Tier 1 suppliers. The SSP is enhancing the DSP and the Implementation Note for Business Partners. The SSP sets the standards for Danone and its suppliers, outlining Danone's commitment to establishing fair, sustainable and ethical relationships.

The SSP applies to all non-farmer Tier 1 suppliers that have a contractual relationship with Danone to provide goods or services, regardless of their size and number of employees. These suppliers are required to pass on mandatory requirements equivalent to the SSP within their own upstream value chains (Tier 2 suppliers and onward) and to any subcontractors performing work under contract with Danone. The SSP covers all commodities sourced by Danone, including the materials used for packaging (paper and cardboard, resins, etc.). The SSP is built on three sets of Fundamental Principles on social, environmental, and business ethics issues. The Fundamental Environmental Principles seek to focus on the issues that have been identified as most relevant, aligning Danone's targets with the expectations from Danone's suppliers. The policy has been approved by the Global Engagement Committee. The Chief Cycles & Procurement Officer is accountable for the implementation of the policy.

CODE OF BUSINESS CONDUCT – updated in 2022, this code is based on principles derived from the Universal Declaration of Human Rights, the fundamental conventions of the ILO, the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and the United Nations Global Compact on human rights, labour rights, the environment and anti-corruption. Employees are required to commit to the Code of Business Conduct as part of their terms of employment and as part of a wider compliance programme across Danone.

<u>CODE OF CONDUCT FOR BUSINESS PARTNERS</u> – updated in 2022, ensures that Danone's business partners comply with applicable laws on bribery and corruption, money laundering, unfair competition and international trade sanctions.

STATEMENT ON FORCED LABOUR- As a member of the CGF, we recognize our role as a responsible business to respect and promote human rights and decent working conditions worldwide. We commit to working together with our peers across the industry and with other key stakeholders to help eradicate forced labour.

GLOBAL EXTERNAL WORKFORCE POLICY - In 2018, Danone issued an internal Global External Workforce Policy, which focused on labour agency workers and prohibiting the payment of recruitment fees by workers

# **DANONE'S LATEST MILESTONES ON HUMAN RIGHTS**

ANALYSIS
OF MOST
SIGNIFICANT
HUMAN RIGHTS
POTENTIAL ISSUES



UPDATE
OF DANONE
SUSTAINABILITY
PRINCIPLES INCL.
SOCIAL PRINCIPLES



DANONE HUMAN RIGHTS POLICY



2021/2022

2022

2022

DANONE IMPACT JOURNEY



HUMAN RIGHTS

→DUE DILIGENCE IN
OWN OPERATIONS

SUSTAINABLE SOURCING POLICY FOR SUPPLIERS





2023

2024...



# **OUR AMBITION**

# THE DANONE IMPACT JOURNEY IN UK & IRELAND

Launched in 2023, the Danone Impact Journey provides a framework to focus our efforts on achieving our mission while simultaneously having a positive impact on the nation's health, on the lives of our employees and communities, and on the planet.

Our Impact Journey helps us prioritise the areas where we can deliver greatest impact across three core pillars: health, nature and people & communities. Against each we have set clear targets to enable us to track our progress and identify areas where we need to go further. Our Impact Journey priorities are embedded in the way we operate as a business – from our strategic business planning, to our product innovation and supplier relationships.

Central to our Danone Impact Journey is our commitment to championing a renewed social contract, cultivating a prosperous and inclusive ecosystem, upholding human rights, and driving meaningful social progress.

Under the People & Communities pillar, our key UK & Ireland human rights priorities are:

- 100% of employees trained on the Human Rights Policy by end of 2025
- Inclusive talent practices embedded by 2025
- Strengthened supplier oversight through SRM and Responsible Sourcing rollout

THROUGH THE DANONE IMPACT
JOURNEY, WE'RE CHAMPIONING A
RENEWED SOCIAL CONTRACT
- FOSTERING A PROSPEROUS AND INCLUSIVE
ECOSYSTEM, UPHOLDING HUMAN RIGHTS
AND PURSUING SOCIAL PROGRESS.



Danone has included in its by-laws social & environmental objectives across **health**, **planet**, **social and inclusiveness**. Danone's progress is overseen by the Mission Committee.



Danone's goal to achieve full B-Corp certification by 2025 is embedded in the Danone Impact Journey.

As a UKI business, we successfully renewed our certification in 2024 scoring 101.4 (+11.2 pt) for all operations in the region.

When it comes to our business practices and stakeholder engagement, we hold ourselves to the highest standards. The relationships we foster with our stakeholders are grounded in trust and guided by open dialogue. Through this dialogue, we can renew our Social Contract built on a foundation of human rights, dignity, and shared social progress.





# DANONE UK & IRELAND HUMAN RIGHTS KEY ACHIEVEMENTS



With the Danone Impact Journey, we have committed to championing a renewed social contract, cultivating a prosperous and inclusive ecosystem, upholding human rights, and driving meaningful social progress.

Since its launch, we have actively engaged our suppliers and key customers across the UK and Ireland by sharing our core priorities. In 2024 we published the <u>UK & Ireland Impact Report</u>, which highlights the progress we've made and the challenges we continue to address on our journey toward positive impact.



In 2024, Danone introduced the Sustainable Sourcing Policy (SSP)—a key step in reinforcing our commitment to responsible business practices. The SSP, which will be progressively implemented across Tier 1 suppliers in the coming years, defines the standards for ethical, fair, and sustainable partnerships between Danone and its suppliers



As a certified Living Wage Employer, we continue to ensure that all directly employed staff in the UK and Ireland receive a wage that meets the real cost of living. This commitment is a cornerstone of our approach to preventing exploitation and promoting decent work.



Danone UKI is B-Corp certified. We successful reaccredited in 2024 and scored 101.4 points (+11.2) demonstrating our commitment to continuous improvement and using our business as a force for good.



In 2024, we proudly launched our Employee Network Groups (ENGs), marking a key milestone in our ongoing inclusion journey. We continued to embed inclusive talent practices across our UK and Ireland operations—strengthening our commitment to fairness, representation and a strong sense of belonging.



As an active member of the Consumer Goods Forum (CGF)'s Human Rights Coalition committed to ending forced labour, Danone has pledged to develop and implement Human Rights Due Diligence (HRDD) systems focused on preventing forced labour within our own operations. Our goal is to achieve full coverage by 2025. To support this, Danone has designed a structured six-step HRDD process, which we aim to roll out company-wide by the end of 2025.



In 2024 we made meaningful progress in advancing our human rights and modern slavery agenda across the UK and Ireland. This included formally launching our Human Rights Due Diligence (HRDD) journey by establishing a dedicated governance taskforce and conducting self-assessments across our operations. These efforts have helped us better identify and address key human rights risks.



In 2025 Danone developed a new training course on the Human Rights Policy targeting all employees worldwide. It will be translated into 24 languages and will be mandatory for all employees worldwide in 2025. The campaign in the UK launches in July.



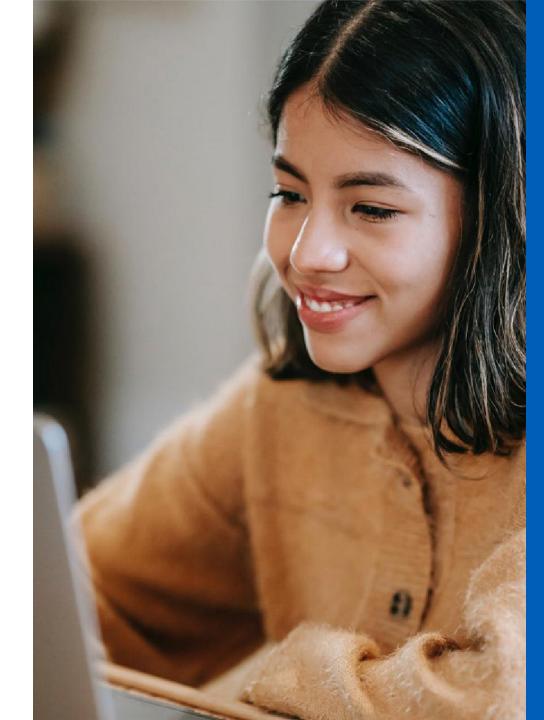
Coordinated by AIM Progress and supported by the Oxfam Business Advisory Service, Danone has piloted in 2023 and 2024 a project to support a group of European logistics suppliers to improve their grievance mechanisms. The pilot was positively received by the suppliers, who successfully implemented the toolkit, resulting in a direct positive impact on Danone's supply chain.



# ADVANCING OUR COMMITMENT TO HUMAN RIGHTS IN UK & IRELAND

In 2024, we strengthened our commitment to human rights by investing in workforce training and upskilling, while enhancing governance through the implementation of Human Rights Due Diligence (HRDD) across our UK & Ireland operations.

- In 2024 we launched a cross-functional Human Rights Taskforce. This cross functional group—comprising HR, Legal & Compliance, Operations, Procurement, and Sustainability—meets bimonthly to oversee our Human Rights Due Diligence (HRDD) programme, coordinate self-assessments, track mitigation actions, and ensure accountability across all functions.
- To embed this commitment across our workforce, we completed self-assessments at all UK & Ireland sites. Each business unit in the UK & Ireland has developed tailored action plans to address salient risks. These plans are reviewed regularly by the governance task force and include measures such as reviewing our onboarding of the external workforce, identity checks in recruitment, and policy updates.
- The Human Rights Taskforce reports quarterly to the UK&I Executive Committee governance forum. This ensures that human rights, modern slavery risks, and mitigation progress are reviewed at the highest level of the organisation. This Committee provides strategic direction, holds functions accountable for closing identified gaps, and ensures alignment with Danone's global human rights commitments and KPIs under the Danone Impact Journey.
- A key milestone was our participation in the Global Human Rights Campus in Paris (2024 and 2025), where the UKI team shared best practices from our HRDD implementation. Helping shape global thinking and inspire action across other markets.
- In 2025, we are rolling out a mandatory human rights training for all, supported by a UKI-specific communication campaign. This includes site-level engagement, digital content, and leadership messaging—designed to embed a culture of vigilance and shared responsibility. We also hosted a masterclass on the six-step HRDD process for our HR team.





# **OUR SUPPLY CHAIN**

As one of the world's biggest food and beverage manufacturers, we understand our impact and influence not only on global food systems, but also the people who work in the industry.

It's important to us that our sourcing has a positive impact, creating jobs and opportunities for people around the world, respecting and promoting human rights.

Our suppliers also have a major role to play in delivering our Danone Impact Journey. This is why we're fostering partnerships and developing mutually beneficial working relationships. Transparency, as well as a mindset of continuous improvement, are key to our supplier engagement, and the promotion of sustainable and inclusive growth.

### RESPECTING THE PEOPLE BEHIND THE FOOD

We know that global and complex agri-food supply chains carry the risk of human rights and environmental violations. Whilst this is more acutely the case upstream at farm or plantation level, it's also a risk at our Company's Tier 1 supply level, as well as in our own entities specifically for the external workforce.

To address these risks, we have:

- Established a set of fundamental Sustainability Principles
- Developed due diligence systems tailored to the respective scopes.
- Continued to engage with our suppliers, working together towards more responsible practices.

# FROM GROUND TO GROCERY STORE

The suppliers we work with are our principal partners in ensuring ethical sourcing. We're part of the same natural and business ecosystem and share many of the same challenges. To make positive progress, we must build solutions together.

As a foundation, all of our suppliers are required to adhere to Danone's Sustainability Principles for Business Partners. But they're invited to go further. We aim to leverage frameworks like B Corp™ and Science Based Targets initiative. Continuous improvement and collaborative problem-solving are a 'win-win' for us and our suppliers, and the key to sourcing in a way that's good for both consumers and society.















### RAW MATERIAL SOURCING

Ingredient supply chains have different structures. Raw milk is the simplest, where we work with thousands of farmers directly or have a maximum of one intermediary. Ingredients, such as dairy, fruit, sugar, cocoa, soy or palm oil, are traded and transformed through complex chains that involve several intermediaries. The challenge here is to have visibility of production locations, so that the risks of human rights violations can be assessed and mitigated.

### TIER 1 SUPPLIERS

Danone sources from over 50,000 suppliers of processed raw materials, packaging or services around the world.

Our RESPECT program provides due diligence for Danone's Tier 1 suppliers

### PRODUCTION SITES

The raw materials that go into our food and drink products are processed at one of our 151 production sites around the world. Most of our UK & Ireland products are produced in Europe, which includes 3 production sites in the UK

We're strengthening our internal Human Rights Due Diligence (HRDD) process to include on site contractor workers and external workers hired through temporary work agencies.

### DISTRIBUTION

Our products are transported direct to retailers both large and small and specialised channels (such as hospitals, clinics and pharmacies). These networks then distribute our products through their own supply chains, before they reach the consumer.



# **DUE DILIGENCE AND VALUE CHAIN MANAGEMENT**

To achieve our commitments, and ensure that our standards are upheld, implementing our policies is critical. This begins by identifying and assessing risks across the supply chain and responding swiftly and effectively to issues identified.

### **DUTY OF VIGILANCE: GOVERNANCE & MANAGEMENT**

Danone's Vigilance Plan demonstrates the Group's aims to continuously improve and intensify its proactive approach to risk prevention and management.

In accordance with French law, Danone's Vigilance Plan sets out the reasonable actions implemented within the Group to identify risks and prevent severe adverse impacts on human rights and fundamental freedoms, the health and safety of people, and the environment.

At global level, a working group meets at least quarterly to oversee the Vigilance Plan implemented within Danone. The working group defines a roadmap, setting out the objectives, milestones and resources required to implement the Vigilance Plan. The Chief Sustainability Officer chairs the group of in-house experts in charge of the following areas: Health and Safety, Food Quality and Safety, Human Rights, Environment, Legal Affairs, Sustainable Finance and Public Affairs. The working group presents its actions to the Global Engagement Committee, which provides strategic guidance, monitors ongoing initiatives and approves action plans. This Committee oversees the working group's progress at least twice a year and is co-chaired by the Chief Sustainability and Strategic Business Development Officer, the General Secretary and the Group Deputy Chief Executive Officer in charge of Finance, Technology & Data, who are all members of the Executive Committee. The following senior executives sit on the committee: Chief Sustainability Officer, SVP Communications, SVP General Counsel, Regulatory Affairs and Compliance, VP Public Affairs, and VP Investor Relations and Sustainable Finance

# SALIENT HUMAN RIGHTS ASSESSMENT

In 2022 Danone conducted a salient human rights impact assessment with the support of Shift, the leading center of expertise on the UN Guiding Principles of Business and Human Rights (UNGPs). In 2023, the assessment was used to develop the Sustainable Sourcing Policy (SSP) approved by the Global Engagement Committee and launched in 2024. The Danone Vigilance Plan was built on this salient human rights assessment.









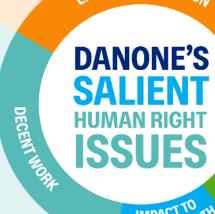
**FORCED LABOR** 







FREEDOM OF **ASSOCIATION** 









**HEALTH, SAFETY AND** WELLBEING AT WORK





# **DUE DILIGENCE AND VALUE CHAIN MANAGEMENT**

Knowing where raw materials are produced is a necessary first step to enable due diligence upstream. For over a decade, we've been working towards greater transparency across the entirety of our supply chain, focusing on palm oil, cocoa, sugar and fruit.

# FORCED LABOUR RISK IN OUR VALUE CHAIN

To identify the risk for forced labour, we use a number of data sources.

### These include:

- Detailed mapping of supply chains and operations
- External risk indices
- Insights from across the business, from internal subject matter experts to local experts and those in country teams
- · Supplier engagement
- Supplier self-assessments and category data
- Audit non-conformities
- Grievances raised on the Danone Ethics line and results from worker engagement surveys
- Insights from external stakeholders, in particular trade unions and civil society, as well as collaborative initiatives with our peers

As part of our saliency assessment in 2022, we looked to understand where vulnerable workers - women, migrant, seasonal/contract and young workers - were more likely to be employed. We know that migrant workers are at higher risk of forced labour, as their movement and recruitment are often poorly regulated and informal. This leaves them more vulnerable to risks such as limited freedom of movement, deception and debt bondage (through the payment of recruitment fees).

# AGRICULTURAL SUPPLY CHAIN TRANSPARENCY TABLE

AGRICU
RAW MATERIAL
Palm Oil
Soybeans
Cocoa
555 <b>3</b> 4

# ADDITIONAL INFORMATION

99%

Traceability to mill/plantation level

CERTIFICATION:
99.2% RSPO certified
97% RSPO segregated
2.2% certified RSPO mass balanced

- Partner with Earthworm Foundation to ensure traceability of palm oil.
- Direct and mill-level suppliers available on our website.

83.5%

of ProTerra segreated soybeans

With the support of an external commodities consultancy (3Keel), Danone runs a traceability exercise twice a year for key forest commodities, including soy, to track, monitor and verify the volumes, origin, certification status, and deforestation and conversion risk of these commodities provided to Danone by its suppliers.

71%

Certified with one or more programmes (Rainforest Alliance, Organic, Fairtrade, Fair For Life).

# **Paper and Board**

99%

of paper and board packaging made of recycled fibres or virgin certified (FSC, PEFC, SFI) fibres.



# **HUMAN RIGHTS DUE DILIGENCE IN DANONE'S OWN OPERATIONS**

In 2016, Danone joined the Consumer Goods Forum's (CGF) collective effort to eradicate forced labour from its global supply chain. To this end, in 2017 we incorporated the three Priority Industry Principles set by the CGF into our Fundamental Social Principles. In 2018, we formalised this commitment in our statement on forced labour.

# **CGF THREE PRIORITY PRINCIPLES**







# **HUMAN RIGHTS DUE DILIGENCE**

As a member of the Consumer Goods Forum (CGF) Human Rights Coalition, Danone pledged to develop and deploy Human Rights Due Diligence (HRDD) systems focusing on forced labor in its operations, with the aim of reaching 100% coverage across all sites by 2025, including external workers hired by temporary work agencies or by subcontractors to carry out regular and continuous work at its entities. In 2021, Danone played a key role in the coalition's collective efforts, supported by the Fair Labor Association (FLA), to develop tools and processes for the due diligence framework.







# HRDD ORGANIZATION AND PROCESS DESIGN

Danone acknowledges that HRDD is an ongoing approach towards continuous improvement. Danone designed a six-step process to implement HRDD, targeting to implement it company wide by the end of 2025 and, moving forward, integrating it in regular business practices: (i) communicating the Human Rights Policy and establishing a human rights governance, (ii) conducting risk assessments, (iii) adopting mitigation plans, (iv) monitoring implementation, (v) communication, and (vi) remediation of adverse impacts.

# DANON

# **HRDD IMPLEMENTATION IN 2024**

# Step 1: Commitment and Integration: communicating the Human Rights Policy and establishing a human rights governance locally

Danone's Human Rights Policy has been translated into local languages in all Country Business Units and its core principles have been communicated to all internal and external personnel at Danone sites. In UKI this communication consisted in sharing the policy and key points via email and internal social media.

# Step 2: Identify and Assess Adverse Impacts: conducting risk assessments

Danone assesses adverse impacts on the ground through audits or self-assessments. With guidance from external experts including the Fair Labor Association Danone has identified ten priority countries of operation, based on two criteria: human right inherent country risk and size of the external workforce employed at Danone's sites. In these ten priority countries, facilities, including plants, headquarters and warehouses, SMETA audits have been conducted by certified auditors. Danone ensured that trade union representatives were interviewed. In the other countries such as the UK and Ireland, human rights self-assessments have been conducted at all priority sites (defined as those with over 150 Danone employees or if the external workforce exceeds 20% of the Danone headcount) using an internal self-assessment tool. The self-assessment tool aligns with the Ethical Trade Initiative (ETI) Basecode and Danone Sustainability Principles. It also incorporates questions from the survey designed by the Fair Labor Association for members of the CGF.

# Step 3: Cease, Prevent, or Mitigate: adopting mitigation plans

100% of audits and 90% of self-assessments scheduled for 2024 have been completed. In the UK 100% of self assessments were completed by the end of 2024. Based on the results, we have developed and are implementing management systems to prevent, mitigate, and address identified human rights issues based on criticality. Mitigation actions are broadly categorised at three levels:

- Site-level measures: actions are taken by local country teams to address risks at individual sites. Most mitigation measures fall into this category.
- Country-level measures: when issues recur across multiple sites within the same country, mitigation measures are coordinated at the country level to ensure consistent resolution.
- Global-level measures: when issues require a broader, long-term approach, they are escalated to the global team by country leads. The objective is to address these issues with strategic, long-term mitigation actions.

# RESPECT PROGRAM FOR RESPONSIBLE SOURCING WITH TIER 1 SUPPLIERS

Danone implements responsible sourcing due diligence to ensure Tier 1 suppliers, other than raw milk suppliers, comply with the DSP and, progressively, the SSP, through its RESPECT program. It involves working with and assessing suppliers, the performance of audits and an obligation to remedy critical non-compliance brought to light by the audit.

Since 2017, Danone has moved the RESPECT program towards a more comprehensive due diligence approach and stepped up its human rights requirements. Such an approach endorses the principles enshrined in the United Nations Guiding Principles on Business and Human Rights (UNGP).

The RESPECT program streamlines evaluation procedures for Tier 1 suppliers and is structured on four main pillars: ESG risk screening of Tier 1 suppliers; self-assessments; onsite assessments commissioned by Danone and performed by third party experts; and ongoing dialogue with suppliers and monitoring of corrective actions.

### TIER 1 SUPPLIER ESG RISK SCREENING AND SELF-ASSESSMENT

In 2024, Danone reinforced its RESPECT process by introducing a new ESG risk screening tool which, when fully deployed, will enable a more tailored and proactive due diligence process, focusing on human rights impacts. Danone requires in-scope Tier 1 suppliers to complete a self-assessment questionnaire evaluating their sustainability performance on the Supplier Ethical Data Exchange (Sedex) or the EcoVadis platform depending on the supplier type. These platforms generate scorecards that evaluate labor standards, health and safety, environmental practices, and business ethics. At the end of 2024, 3,159 supplier entities were registered on the Sedex or EcoVadis platforms representing 70.8% of the spend, compared to 3,511 in 2023 representing 69% of the spend.

# **ON-SITE ASSESSMENT (AUDITS)**

Danone identifies high-risk or high-priority suppliers to undergo onsite assessments (audits). The 2024 audit plan was designed using the in-house approach in place since 2020, combining human rights risks and spend level. Based on this analysis, the RESPECT team collaborated with purchasing teams worldwide to co-develop the 2024 audit plan, selecting 100 high-risk or high-priority sites for audit. Among these, 92 sites completed an on-site or virtual assessment, in accordance with the Sedex Members Ethical Trade Audit (SMETA) protocol or the Sedex Virtual Audit (SVA) protocol.

Both protocols assess labor standards, health and safety, environmental practices, and business ethics. The audits are conducted by third-party experts. Through the Sedex platform, Danone can also access audit reports of shared suppliers conducted by peer companies and participates in mutual recognition of audits through the AIM-Progress initiative. As a result, in 2024, Danone had access to 531 SMETA audits performed on its suppliers, either by the Group or by its peers.

### ONGOING DIALOGUE WITH SUPPLIERS WITH MONITORING OF CORRECTIVE ACTIONS

Following an audit, Danone's goal is to establish regular dialogue with its Tier 1 suppliers about their responsible business practices and to monitor the implementation of corrective actions identified by the audits, including those conducted by peer companies on shared suppliers. To support suppliers and monitor the audit follow up, the RESPECT team has dedicated resources in Asia and Latin America. The objective is to assist suppliers in developing their corrective action plans by providing expert support, resources and regular engagement, with the goal of getting the audit closed by the auditor after verification in accordance with the SMETA methodology.



# TRACKING AND ASSESSING THE EFFECTIVENESS OF SUPPLIER PROGRAMS

Danone tracks its RESPECT program using the following three indicators:

# **KEY PERFORMANCE INDICATOR**

# **RESULT**

# PERCENTAGE OF THE EXPENDITURE COVERED BY THE RESPECT PROGRAM

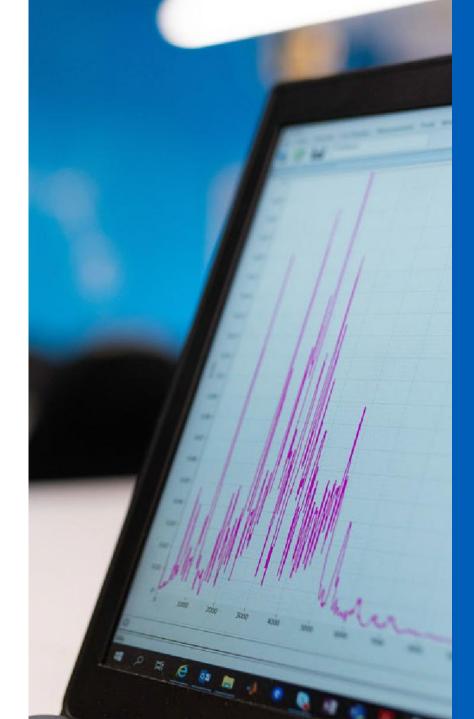
• 70.8% of Danone's in-scope expenditure was covered by the RESPECT program, excluding raw milk, real estate, and tax services in 2024.

# ANNUAL AUDIT PLAN COMPLETION

• 90.2% of SMETA audits planned were completed in 2024.

# **AUDIT CLOSURE RATE**

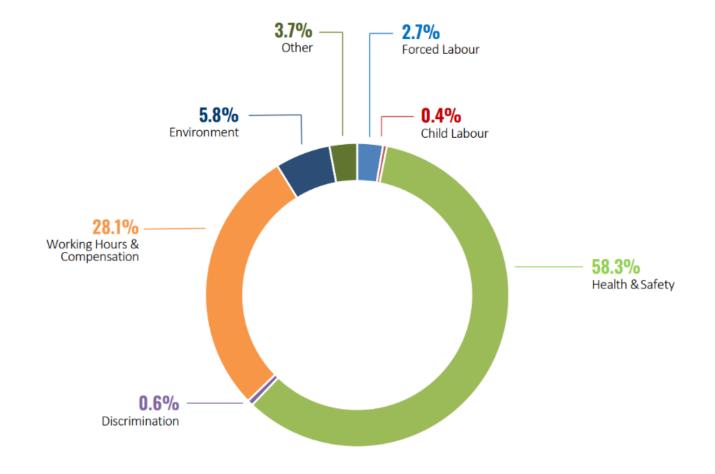
- 80.9% of audits that identified critical non-conformities (being commissioned by Danone or by peers on common suppliers) have been closed in the expected timeframe. Audits that have not been closed continue to be monitored. In most cases, critical nonconformities were related to health and safety, working hours, and compensation.
- One case was identified related to child labor (under investigation) and one case related to forced labor (not substantiated) in Danone's value chain.





# **BREAKDOWN OF CRITICAL NON-CONFORMITIES IDENTIFIED**

Globally, we conducted an analysis on the 480 critical non-conformities identified through the SMETA audits conducted in 2024 (or those conducted using a similar methodology) and work with the suppliers to ensure they are resolved and remedied. All the critical non-conformities reported here have either been resolved or are being remedied with the suppliers.







# WHISTLEBLOWING SYSTEM

Since 2017, the Danone Ethics Line (DEL) has enabled whistleblowers to report concerns about any existing or potential wrongdoing in breach of the Danone Code of Business Conduct, including suspected human rights violations and environmental breaches. The reporting process, developed in consultation with employee representatives, ensures that whistleblowers are protected. The whistleblowing statement is available on Danone's website and on the homepage of Danone's whistleblowing system.

The DEL covers Danone's employees as well as all workers in the value chain (temporary agency workers, workers employed via external service providers, independent contractors), including Danone's own workforce. The DEL is also open to former employees, suppliers and any other third parties. Upgraded in 2022, the DEL is available to all around the world at any time, 24/7, via the internet or phone, in 56 languages: www.danoneethicsline.com. Reports can be made, anonymously, if necessary, about any violation of the Code of Business Conduct or any of Danone's policies (e.g. compliance, Cybersecurity, purchasing), illegal behaviors, inappropriate financial practices or activities posing an environmental or human rights risk.

In 2021, Danone's human rights category on the DEL was broadened to include discrimination, harassment, and employee health, safety, and security, in addition to the initial scope of child labor, forced labor, the right to collective bargaining, working hours, and wages. Since 2022, all these topics have been grouped under the "human rights" umbrella, addressing Danone's commitments on:

- Ending exploitation- prohibiting child and forced labour, prohibiting harassment and abuse, and ensuring reasonable working hours
- Decent work granting a decent wage and at least the applicable legal minimum or standard pay, committing to safe and healthy working conditions, granting freedom of association and the right to collective bargaining, and ensuring all workers are treated equally with respect and dignity, with a positive culture towards diversity and inclusion

# **GRIEVANCE MECHANISM**

Each alert, whether internally or externally, is initially reviewed by the Global Compliance Integrity team and/or the Global Human Resources Compliance and Labor Law team, which then appoints an independent internal or external investigator. Serious breaches are given the highest priority and are handled in collaboration with the Chief Human Resources Officer, a member of the Executive Committee. For concerns raised by or concerning non-Danone team employees, the Human Resources compliance team will typically be assisted by the Human Rights and Sustainability (procurement) teams. Any serious violations identified through the DEL and any nonconformities identified during the Group's controls and audits are remediated in collaboration with the appropriate internal experts within the Group and is overseen by the Chief Human Resources Officer.

In 2024, a total of 516 concerns relating to potential human rights violations were recorded in 36 countries, compared with 388 concerns in 31 countries in 2023. Among those reports processed, 156 were substantiated (or partially substantiated) and 160 were still under investigation on as of December 31, 2024.

No cases were identified related to child or forced labor in Danone's own workforce.

# MANAGING GRIEVANCES AND CONCERNS RELATED TO RAW MATERIALS

Danone also has investigation and remediation process in place to manage grievances that come through other channels than Danone Ethics Line, in particular related to raw material supply. Since 2019, Danone has implemented a grievance mechanism for palm oil, with the support of the Earthworm Foundation. Currently this mechanism is also being used for other commodities. Danone is working to adapt the process to track and manage more effectively all commodity alerts.

A dedicated team meets regularly to address any incoming NGO and media alerts. When allegations of non-compliance against producers arise, the Group carries out an investigation with support from internal and external experts, and in particular Tier 1 suppliers. If a low-risk non-conformity has been confirmed, Danone asks the producers to develop an action plan to resolve the non-conformity. In the case of a high-risk non-conformity, which has occurred most often for palm oil, the Group works with its Tier 1 suppliers and can choose to suspend the non-compliant producers until they demonstrate concrete progress towards its commitments. Danone informs all of its active suppliers about the suspension decisions, and the suspended producer is only allowed to enter the Group's supply chain after demonstrating progress and, ultimately, with Danone's consent.

In total, Danone is currently monitoring 18 alerts raised by organizations such as the Earthworm Foundation, RAN, Global Witness and Mighty Earth. In line with Danone's grievance mechanism, they are being investigated and monitored in dialogue with the parties involved and the supporting NGOs and experts.



# **PARTNERSHIPS & COMMITMENTS**

By engaging in partnerships and making specific public commitments, Danone is working with its partners towards more responsible practices.

In 2023 and 2024, Danone participated in a pilot project to support a group of European logistics suppliers to improve their grievance mechanisms. The pilot was developed and coordinated by AIM Progress and supported by the Oxfam Business Advisory Service. The purpose was for the suppliers' workers (the main target group in this case being truck drivers) to raise issues and concerns with their employer in a safe, trusted, and transparent manner. The Oxfam Business Advisory Service worked with the suppliers to navigate and utilize a grievance mechanism toolkit developed by Oxfam and one of the members of the AIM-Progress grievance mechanism working group. The pilot was positively received by the suppliers, who successfully implemented the toolkit, resulting in a direct positive impact on Danone's supply chain.



We're also members of a forum AIM-PROGRESS where we collaborate to share best practice around responsible sourcing and human rights amongst other Fast Moving Consumer Goods (FMCG) manufacturers and peers.

### Q Pre-2016

- Member of UN Global Compact since 2003
- RESPECT programme supplier compliance with social principles launched 2005
- Programme expanded to include environmental and ethics principles in 2009

### Q 2017

We incorporated the three priorities set by the CGF into our Fundamental Social Principles







### O 2019

- We also introduced our third RESPECT KPI: audit closure
- Collaborated with OECD in the launch of the Business for Inclusive Growth coalition





### 2021

 Developed the social pillar survey of Danone's Regenerative Agriculture Framework with the support of WWF



### 2023

- Participated in the AIM-Progress 2023 India Initiative to raise awareness for human rights and sustainable sourcing practices with suppliers from India
- Danone sponsored and coordinated the event, hosting more than 150 suppliers in New Delhi

### 2016

Joined the Consumer Goods Forum's collective effort to eradicate forced labour from its global supply chain



### 2018

- · Published our statement on Forced Labour
- Launched Global External Workforce Policy



### 202

- Introduced expert support to help suppliers develop corrective action plans for social audits with non-conformities
- Pledged to develop Human Rights Due Diligence (HRDD) focused on Forced Labour in our own operations

### 2022

Joined the 100+ companies, investors, business associations and initiatives releasing a joint statement urging the EU to swiftly adopt the Due Diligence Directive Proposal







# **LOOKING AHEAD**

At Danone UK & Ireland we're committed to respecting human rights in our value chain and combating forced labour.

While we've made meaningful progress, we recognise that there is still important work ahead to fully realise our ambition of supporting thriving communities. This includes continuing to foster an inclusive and prosperous ecosystem, upholding human rights, and driving sustained social progress

We will continue this important work, in collaboration with our stakeholders, throughout 2025/2026, focusing on:

# HUMAN RIGHTS DUE DILIGENCE

Continuing and evolving the work launched under our HRDD system, led by our Human Rights Champion and supported by a cross-functional task force.

### EMPLOYEE AWARENESS AND TRAINING

Rolling out mandatory human rights training to all employees, with full completion targeted by year-end. Deployment plans are tailored to digitally connected and manufacturing staff. A company-wide campaign is underway to raise awareness and reinforce employee responsibility.

### BUILDING INTERNAL CAPABILITY

Investing in targeted upskilling and promoting collaboration across functions to strengthen internal expertise.

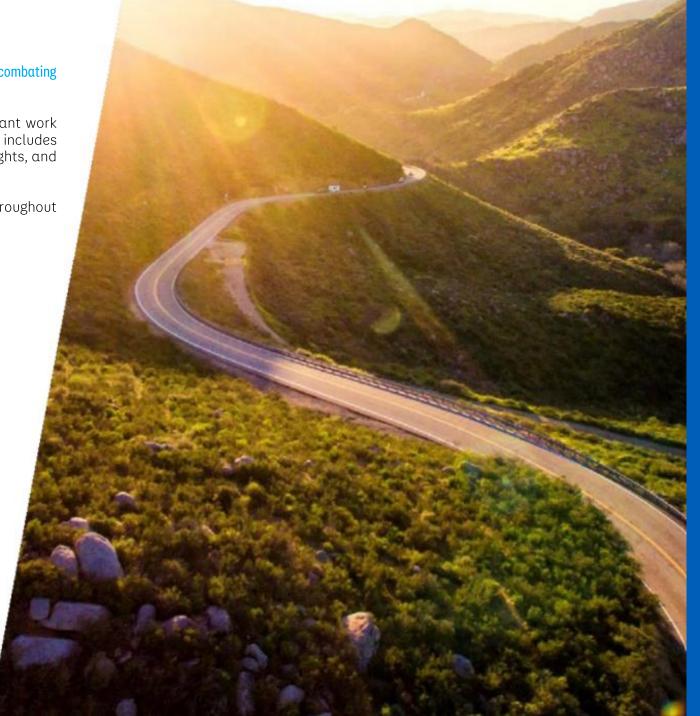
# SUPPLIER ENGAGEMENT

From September 2025, the Danone Sustainable Sourcing Policy will be introduced to suppliers in the UK and Ireland to support sustainability and human rights due diligence.

### MONITORING AND IMPLEMENTATION

Enhancing our RESPECT programme to monitor supplier performance and support policy implementation.







# **CONTACTS**

If you have any comments or queries, please contact:

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