

Report title indicator Sectoral/fishery Assessment or Ingredient Manufacturer Assessment Summary Report, v1.0
2.2.11

Instructions
 This template is intended for reporting a summary of Due Diligence pathways 2, "sectoral/fishery assessment" or 3 "ingredient manufacturer assessment" under Principle 2. Reporting is at a UoC level and on an annual basis. The UoC should select the pathway used and the type of assessment (whether ingredient manufacturer or plant/marine primary raw material).
 The UoC enters the date the assessment was conducted.
 The UoC selects the primary raw material assessed (if applicable). If primary raw material is not listed, the UoC enters the common name and latin name.
 The UoC selects the risk factor assessed.
 The UoC selects the country of location (ingredient manufacturer) or production (plant primary raw material). For marine primary raw material, "Fishery" is selected as the Country of location.
 The UoC selects the FAO fishing area for the marine primary raw material.
 The UoC enters a summary description of the risk assessment (max 1500 characters).
 The UoC enters links to any publicly available resources used.
 The UoC enters a summary description of any measures taken to ensure low risk (for ingredient manufacturer assessment only) (max 1500 characters).
 The UoC enters a summary description of implemented monitoring program to a) measure the effectiveness of any measure taken to ensure low risk (if applicable) and b) monitor the risk factors, or indicators for the risk factors, to ensure the risk level determined remains valid (max 1500 characters)



A new row should be added for each assessment and for each risk factor assessed (if more than one).

Table 1. Summary of due diligence pathways 2 and 3 report

Pathway used	Type of Assessment	Date of Due Diligence Assessment (yyyy-mm-dd)	Primary Raw Material "common name (latin name)"	Risk Factor Assessed	Country of location/production (select Fishery if Marine primary raw material)	FAO Fishing area (if Marine primary raw material)	Summary description of risk assessment (max 1500 characters)	Links to any publicly available resources used	Summary description of any measures taken and their effectiveness (max 1500 characters)	Summary description of implemented monitoring program (max 1500 characters)
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Legal	Ukraine		The company considers the legal risk in its European corn supply chain to be very low, due to high mechanization, and minimal risks related to forced labour and deforestation. They plan to strengthen their due diligence tools and on-site assessments. Available documentation demonstrates the company's strong commitment to legal compliance — both at the factory level and throughout their supply chain, including suppliers and primary raw materials. Based on current evidence, legal risk is considered low in: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Social	Ukraine		The company estimates the social risk in its European corn supply chain to be very moderate, due to high mechanization, and low risks of forced labour and deforestation. They plan to further develop due diligence tools and field assessments. Documentation provided shows that social risks are a key concern for the company, both within their own factories and across the supply chain, including suppliers and primary raw materials. Based on the available information, low social risk can be demonstrated for: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Environmental	Ukraine		Documentation provided by the company shows that environmental risks are a major concern for the company — both within their own facilities and throughout their supply chain, including suppliers and primary raw materials. Roquette has set a zero-deforestation target by 2030, demonstrating strong environmental commitment. Based on the documentation, low environmental risk can be demonstrated for: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Legal	Poland		The company considers the legal risk in its European corn supply chain to be very low, due to high mechanization, and minimal risks related to forced labour and deforestation. They plan to strengthen their due diligence tools and on-site assessments. Available documentation demonstrates the company's strong commitment to legal compliance — both at the factory level and throughout their supply chain, including suppliers and primary raw materials. Based on current evidence, legal risk is considered low in: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Social	Poland		The company estimates the social risk in its European corn supply chain to be very moderate, due to high mechanization, and low risks of forced labour and deforestation. They plan to further develop due diligence tools and field assessments. Documentation provided shows that social risks are a key concern for the company, both within their own factories and across the supply chain, including suppliers and primary raw materials. Based on the available information, low social risk can be demonstrated for: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Environmental	Poland		Documentation provided by the company shows that environmental risks are a major concern for the company — both within their own facilities and throughout their supply chain, including suppliers and primary raw materials. Roquette has set a zero-deforestation target by 2030, demonstrating strong environmental commitment. Based on the documentation, low environmental risk can be demonstrated for: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Legal	Bulgaria		The company considers the legal risk in its European corn supply chain to be very low, due to high mechanization, and minimal risks related to forced labour and deforestation. They plan to strengthen their due diligence tools and on-site assessments. Available documentation demonstrates the company's strong commitment to legal compliance — both at the factory level and throughout their supply chain, including suppliers and primary raw materials. Based on current evidence, legal risk is considered low in: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Social	Bulgaria		The company estimates the social risk in its European corn supply chain to be very moderate, due to high mechanization, and low risks of forced labour and deforestation. They plan to further develop due diligence tools and field assessments. Documentation provided shows that social risks are a key concern for the company, both within their own factories and across the supply chain, including suppliers and primary raw materials. Based on the available information, low social risk can be demonstrated for: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Environmental	Bulgaria		Documentation provided by the company shows that environmental risks are a major concern for the company — both within their own facilities and throughout their supply chain, including suppliers and primary raw materials. Roquette has set a zero-deforestation target by 2030, demonstrating strong environmental commitment. Based on the documentation, low environmental risk can be demonstrated for: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Legal	Romania		The company considers the legal risk in its European corn supply chain to be very low, due to high mechanization, and minimal risks related to forced labour and deforestation. They plan to strengthen their due diligence tools and on-site assessments. Available documentation demonstrates the company's strong commitment to legal compliance — both at the factory level and throughout their supply chain, including suppliers and primary raw materials. Based on current evidence, legal risk is considered low in: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Social	Romania		The company estimates the social risk in its European corn supply chain to be very moderate, due to high mechanization, and low risks of forced labour and deforestation. They plan to further develop due diligence tools and field assessments. Documentation provided shows that social risks are a key concern for the company, both within their own factories and across the supply chain, including suppliers and primary raw materials. Based on the available information, low social risk can be demonstrated for: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Environmental	Romania		Documentation provided by the company shows that environmental risks are a major concern for the company — both within their own facilities and throughout their supply chain, including suppliers and primary raw materials. Roquette has set a zero-deforestation target by 2030, demonstrating strong environmental commitment. Based on the documentation, low environmental risk can be demonstrated for: Bulgaria, Croatia, Hungary, Italy, Poland, Romania, Serbia, Slovakia, and Ukraine.			

Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Social	Poland		The company requires its suppliers to uphold strong human rights principles, including the elimination of child and forced labour, and to comply with all obligations outlined in its Human Rights Policy. Suppliers are expected to: Protect the health and safety of all individuals affected by their activities Respect freedom of association without fear of retaliation Ensure dignity, inclusion, and emotional safety in the workplace Provide fair and equitable compensation Comply with legal limits on working hours and overtime Uphold land and resource rights, particularly for indigenous and minority communities These expectations apply throughout the suppliers' operations and supply chains.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Environmental	Poland		The company has an established procedure for managing supply chain risk and therefore we regard them to have sufficient approaches to manage, mitigate and lower risk (Whistle Blowing / Ethics Line, Due Diligence).			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Legal	Czech Republic		The company as an ingredient manufacturer have sufficient measures and procedures in place to determine low risk. There are a number of detailed policies including a Supplier Code of Conduct, a corporate due diligence approach and a human rights policy. The company has a Supplier Code of Conduct which they expect their suppliers to follow. A key part of the Code of Conduct is that suppliers must obey the law.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Social	Czech Republic		The company requires its suppliers to uphold strong human rights principles, including the elimination of child and forced labour, and to comply with all obligations outlined in its Human Rights Policy. Suppliers are expected to: Protect the health and safety of all individuals affected by their activities Respect freedom of association without fear of retaliation Ensure dignity, inclusion, and emotional safety in the workplace Provide fair and equitable compensation Comply with legal limits on working hours and overtime Uphold land and resource rights, particularly for indigenous and minority communities These expectations apply throughout the suppliers' operations and supply chains.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Environmental	Czech Republic		The company has an established procedure for managing supply chain risk and therefore we regard them to have sufficient approaches to manage, mitigate and lower risk (Whistle Blowing / Ethics Line, Due Diligence).			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Legal	Serbia		The company as an ingredient manufacturer have sufficient measures and procedures in place to determine low risk. There are a number of detailed policies including a Supplier Code of Conduct, a corporate due diligence approach and a human rights policy. The company has a Supplier Code of Conduct which they expect their suppliers to follow. A key part of the Code of Conduct is that suppliers must obey the law.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Social	Serbia		The company requires its suppliers to uphold strong human rights principles, including the elimination of child and forced labour, and to comply with all obligations outlined in its Human Rights Policy. Suppliers are expected to: Protect the health and safety of all individuals affected by their activities Respect freedom of association without fear of retaliation Ensure dignity, inclusion, and emotional safety in the workplace Provide fair and equitable compensation Comply with legal limits on working hours and overtime Uphold land and resource rights, particularly for indigenous and minority communities These expectations apply throughout the suppliers' operations and supply chains.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Environmental	Serbia		The company has an established procedure for managing supply chain risk and therefore we regard them to have sufficient approaches to manage, mitigate and lower risk (Whistle Blowing / Ethics Line, Due Diligence).			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Legal	Ukraine		The company as an ingredient manufacturer have sufficient measures and procedures in place to determine low risk. There are a number of detailed policies including a Supplier Code of Conduct, a corporate due diligence approach and a human rights policy. The company has a Supplier Code of Conduct which they expect their suppliers to follow. A key part of the Code of Conduct is that suppliers must obey the law.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Social	Ukraine		The company requires its suppliers to uphold strong human rights principles, including the elimination of child and forced labour, and to comply with all obligations outlined in its Human Rights Policy. Suppliers are expected to: Protect the health and safety of all individuals affected by their activities Respect freedom of association without fear of retaliation Ensure dignity, inclusion, and emotional safety in the workplace Provide fair and equitable compensation Comply with legal limits on working hours and overtime Uphold land and resource rights, particularly for indigenous and minority communities These expectations apply throughout the suppliers' operations and supply chains.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	2024-11-16	Corn gluten	Environmental	Ukraine		The company has an established procedure for managing supply chain risk and therefore we regard them to have sufficient approaches to manage, mitigate and lower risk (Whistle Blowing / Ethics Line, Due Diligence).			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	09/05/2025	wheat gluten	Legal	Hungary	09/05/2025	According to the company's Supplier Code of Conduct, suppliers and distributors are required to comply with all applicable laws, regulations, and standards in the countries where they operate. When providing services, suppliers must adhere to this Code and ensure that the same or equivalent principles are upheld by their own suppliers and subcontractors. Non-compliance may lead to termination of the commercial relationship. As part of the company's supplier approval and due diligence process, all suppliers undergo screening to ensure alignment with the company's values. Strategic suppliers are assessed using CSR criteria via the Easy Supplier tool, and annual evaluations are conducted through Easy Performance, with action plans when necessary. All suppliers are screened using the Exger tool, which covers environmental, social, and governance (ESG) risks. Signing the Supplier Code of Conduct is mandatory, and audits are performed. Documentation shows that the company demonstrates strong responsibility regarding legal compliance, both within its own operations and throughout the supply chain, including primary raw materials. Based on current systems in place, the legal risk of non-compliance for raw materials from Hungary is considered low.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	09/05/2025	wheat gluten	Social	Hungary	09/05/2025	The company's principles on Human Rights are defined in its Supplier Code of Conduct, requiring suppliers to uphold fundamental standards including the prohibition of forced and child labor, in line with ILO conventions. The company has launched a sustainability program called "Life-Nature" built on three pillars: PRESERVE the planet, INVENT for the future, and CARE for people. The last one covers ethics, safety, and human rights, with the goal of assessing 100% of strategic suppliers for compliance. In line with CSR obligations, the company publishes an annual report detailing its risk management and remediation approach for workers in the value chain. It is committed to the UN Global Compact and ILO conventions, and joined the "Entreprises pour les Droits Humains" network in 2024. Processes in place include: a public Supplier Code of Conduct, mandatory supplier qualification via Easy Supplier, and CSR questionnaires assessing human rights, ISO45001, Ecovadis scores, etc. The goal is full CSR qualification of strategic suppliers by 2030. Policies address human trafficking, forced labor, harassment, freedom of association, child labor, and data protection, and are overseen by Compliance and Purchasing teams. The "SpeakUp" grievance mechanism allows for anonymous reporting, with guarantees of whistleblower protection. Reports have been made and acted upon. Documentation shows robust human rights risk control across the supply chain.			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	09/05/2025	wheat gluten	Environmental	Hungary		Sustainability is a key part of the company's strategy. Its Environmental Policy places sustainable development at the core of business priorities. The "Life-Nature" program outlines three strategic pillars: "PRESERVE the planet", "INVENT for the future", and "CARE for people". Under "PRESERVE", the company commits by 2030 to: reduce CO ₂ emissions by 25% reduce water use by 20% ensure 60% of plant-based raw materials are sustainable and certified implement 100 global biodiversity initiatives achieve zero deforestation Suppliers are expected to uphold environmental laws and standards at least equivalent to those in the Supplier Code of Conduct. When contracted, suppliers must ensure these principles are respected throughout their own supply chain. The company's due diligence process includes multiple screening tools that address environmental, social, and governance (ESG) risks. From 2024, suppliers receive a questionnaire covering human rights, labor laws, health, safety, diversity, environment, and climate. By 2030, 100% of strategic suppliers will be assessed. Action plans are required if results are insufficient. The company's documentation shows that environmental risks are taken seriously across both internal operations and the supply chain. Global Forest Watch confirms Hungary as low-risk for deforestation and environmental harm.			

Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Legal	Spain	<p>The company uses a dual approach to risk assessment, combining abstract risks (based on industry trends, geopolitical context, and commodity/location profiles) with concrete risks (linked to specific suppliers or regions).</p> <p>When a supplier scores high on abstract risk, they are required to complete a targeted questionnaire addressing specific social and environmental concerns. Based on the results, the company may implement tailored actions such as audits, certifications, or training programs.</p> <p>The effectiveness of this process is reviewed annually through KPI reporting to the board and follow-up cycles to measure impact. High-risk suppliers are prioritized for engagement, with broader implementation planned over time.</p> <p>This approach is detailed in the company's Corporate Due Diligence Policy and referenced in the Supplier Code of Conduct.</p> <p>The methodology aligns with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, and OECD-FAO frameworks on agriculture and deforestation.</p> <p>Based on current documentation, low legal risk can be demonstrated for: Bulgaria, Hungary, Latvia, Poland, Romania, and Slovakia</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Social	Spain	<p>The company applies a dual risk approach, combining abstract risks (e.g. geopolitical context, sector trends) and concrete risks (verified issues linked to suppliers or regions).</p> <p>When abstract risk is high, suppliers complete a targeted questionnaire on social and environmental issues. Depending on the results, the company may implement specific actions, such as audits, certifications, or training.</p> <p>They report annually on KPIs to their board to evaluate the effectiveness of this process and prioritize high-risk suppliers, with gradual expansion to others.</p> <p>This methodology is outlined in the Corporate Due Diligence Policy and the Supplier Code of Conduct, and follows international frameworks (UNGP's, OECD, OECD-FAO).</p> <p>An anonymous grievance mechanism is also available via the Ethics Open Line.</p> <p>Based on available documentation, low social risk is demonstrated for: Bulgaria, Czechia, Hungary, Latvia, Poland, Romania, and Slovakia.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Environmental	Spain	<p>The company uses a risk assessment process that includes both abstract risks (e.g. geopolitical context, sector trends) and concrete risks (verified supplier-specific issues).</p> <p>When abstract risk is high, suppliers are asked to complete a questionnaire focused on social and environmental topics. Based on results, tailored action plans may be implemented, including audits, certifications, or training.</p> <p>Annual KPI reviews are submitted to the board to monitor effectiveness. The company prioritizes high-risk suppliers, with a phased approach for broader deployment.</p> <p>This process is detailed in the Corporate Due Diligence Policy and follows key frameworks such as the UNGPs, OECD, and OECD-FAO guidelines.</p> <p>The company sources only certified wheat meeting the FSA Silver benchmark, ensuring independently audited sustainability standards beyond EU regulations.</p> <p>Based on documentation, low illegal risk is demonstrated for: Bulgaria, Czechia, Hungary, Poland, Romania, and Slovakia.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Legal	Hungary	<p>The company uses a dual approach to risk assessment, combining abstract risks (based on industry trends, geopolitical context, and commodity/location profiles) with concrete risks (linked to specific suppliers or regions).</p> <p>When a supplier scores high on abstract risk, they are required to complete a targeted questionnaire addressing specific social and environmental concerns. Based on the results, the company may implement tailored actions such as audits, certifications, or training programs.</p> <p>The effectiveness of this process is reviewed annually through KPI reporting to the board and follow-up cycles to measure impact. High-risk suppliers are prioritized for engagement, with broader implementation planned over time.</p> <p>This approach is detailed in the company's Corporate Due Diligence Policy and referenced in the Supplier Code of Conduct.</p> <p>The methodology aligns with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, and OECD-FAO frameworks on agriculture and deforestation.</p> <p>Based on current documentation, low legal risk can be demonstrated for: Bulgaria, Hungary, Latvia, Poland, Romania, and Slovakia</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Social	Hungary	<p>The company applies a dual risk approach, combining abstract risks (e.g. geopolitical context, sector trends) and concrete risks (verified issues linked to suppliers or regions).</p> <p>When abstract risk is high, suppliers complete a targeted questionnaire on social and environmental issues. Depending on the results, the company may implement specific actions, such as audits, certifications, or training.</p> <p>They report annually on KPIs to their board to evaluate the effectiveness of this process and prioritize high-risk suppliers, with gradual expansion to others.</p> <p>This methodology is outlined in the Corporate Due Diligence Policy and the Supplier Code of Conduct, and follows international frameworks (UNGP's, OECD, OECD-FAO).</p> <p>An anonymous grievance mechanism is also available via the Ethics Open Line.</p> <p>Based on available documentation, low social risk is demonstrated for: Bulgaria, Czechia, Hungary, Latvia, Poland, Romania, and Slovakia.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Environmental	Hungary	<p>The company uses a risk assessment process that includes both abstract risks (e.g. geopolitical context, sector trends) and concrete risks (verified supplier-specific issues).</p> <p>When abstract risk is high, suppliers are asked to complete a questionnaire focused on social and environmental topics. Based on results, tailored action plans may be implemented, including audits, certifications, or training.</p> <p>Annual KPI reviews are submitted to the board to monitor effectiveness. The company prioritizes high-risk suppliers, with a phased approach for broader deployment.</p> <p>This process is detailed in the Corporate Due Diligence Policy and follows key frameworks such as the UNGPs, OECD, and OECD-FAO guidelines.</p> <p>The company sources only certified wheat meeting the FSA Silver benchmark, ensuring independently audited sustainability standards beyond EU regulations.</p> <p>Based on documentation, low illegal risk is demonstrated for: Bulgaria, Czechia, Hungary, Poland, Romania, and Slovakia.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Legal	Bulgaria	<p>The company uses a dual approach to risk assessment, combining abstract risks (based on industry trends, geopolitical context, and commodity/location profiles) with concrete risks (linked to specific suppliers or regions).</p> <p>When a supplier scores high on abstract risk, they are required to complete a targeted questionnaire addressing specific social and environmental concerns. Based on the results, the company may implement tailored actions such as audits, certifications, or training programs.</p> <p>The effectiveness of this process is reviewed annually through KPI reporting to the board and follow-up cycles to measure impact. High-risk suppliers are prioritized for engagement, with broader implementation planned over time.</p> <p>This approach is detailed in the company's Corporate Due Diligence Policy and referenced in the Supplier Code of Conduct.</p> <p>The methodology aligns with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, and OECD-FAO frameworks on agriculture and deforestation.</p> <p>Based on current documentation, low legal risk can be demonstrated for: Bulgaria, Hungary, Latvia, Poland, Romania, and Slovakia</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Social	Bulgaria	<p>The company applies a dual risk approach, combining abstract risks (e.g. geopolitical context, sector trends) and concrete risks (verified issues linked to suppliers or regions).</p> <p>When abstract risk is high, suppliers complete a targeted questionnaire on social and environmental issues. Depending on the results, the company may implement specific actions, such as audits, certifications, or training.</p> <p>They report annually on KPIs to their board to evaluate the effectiveness of this process and prioritize high-risk suppliers, with gradual expansion to others.</p> <p>This methodology is outlined in the Corporate Due Diligence Policy and the Supplier Code of Conduct, and follows international frameworks (UNGP's, OECD, OECD-FAO).</p> <p>An anonymous grievance mechanism is also available via the Ethics Open Line.</p> <p>Based on available documentation, low social risk is demonstrated for: Bulgaria, Czechia, Hungary, Latvia, Poland, Romania, and Slovakia.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Environmental	Bulgaria	<p>The company uses a risk assessment process that includes both abstract risks (e.g. geopolitical context, sector trends) and concrete risks (verified supplier-specific issues).</p> <p>When abstract risk is high, suppliers are asked to complete a questionnaire focused on social and environmental topics. Based on results, tailored action plans may be implemented, including audits, certifications, or training.</p> <p>Annual KPI reviews are submitted to the board to monitor effectiveness. The company prioritizes high-risk suppliers, with a phased approach for broader deployment.</p> <p>This process is detailed in the Corporate Due Diligence Policy and follows key frameworks such as the UNGPs, OECD, and OECD-FAO guidelines.</p> <p>The company sources only certified wheat meeting the FSA Silver benchmark, ensuring independently audited sustainability standards beyond EU regulations.</p> <p>Based on documentation, low illegal risk is demonstrated for: Bulgaria, Czechia, Hungary, Poland, Romania, and Slovakia.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Legal	Romania	<p>The company uses a dual approach to risk assessment, combining abstract risks (based on industry trends, geopolitical context, and commodity/location profiles) with concrete risks (linked to specific suppliers or regions).</p> <p>When a supplier scores high on abstract risk, they are required to complete a targeted questionnaire addressing specific social and environmental concerns. Based on the results, the company may implement tailored actions such as audits, certifications, or training programs.</p> <p>The effectiveness of this process is reviewed annually through KPI reporting to the board and follow-up cycles to measure impact. High-risk suppliers are prioritized for engagement, with broader implementation planned over time.</p> <p>This approach is detailed in the company's Corporate Due Diligence Policy and referenced in the Supplier Code of Conduct.</p> <p>The methodology aligns with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, and OECD-FAO frameworks on agriculture and deforestation.</p> <p>Based on current documentation, low legal risk can be demonstrated for: Bulgaria, Hungary, Latvia, Poland, Romania, and Slovakia</p>			

Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Legal	Denmark	<p>The company uses a dual approach to risk assessment, combining abstract risks (based on industry trends, geopolitical context, and commodity/location profiles) with concrete risks (linked to specific suppliers or regions).</p> <p>When a supplier scores high on abstract risk, they are required to complete a targeted questionnaire addressing specific social and environmental concerns. Based on the results, the company may implement tailored actions such as audits, certifications, or training programs.</p> <p>The effectiveness of this process is reviewed annually through KPI reporting to the board and follow-up cycles to measure impact. High-risk suppliers are prioritized for engagement, with broader implementation planned over time.</p> <p>This approach is detailed in the company's Corporate Due Diligence Policy and referenced in the Supplier Code of Conduct.</p> <p>The methodology aligns with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, and OECD-FAO frameworks on agriculture and deforestation.</p> <p>Based on current documentation, low legal risk can be demonstrated for: Bulgaria, Hungary, Latvia, Poland, Romania, and Slovakia</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Social	Denmark	<p>The company applies a dual risk approach, combining abstract risks (e.g. geopolitical context, sector trends) and concrete risks (verified issues linked to suppliers or regions).</p> <p>When abstract risk is high, suppliers complete a targeted questionnaire on social and environmental issues. Depending on the results, the company may implement specific actions, such as audits, certifications, or training.</p> <p>They report annually on KPIs to their board to evaluate the effectiveness of this process and prioritize high-risk suppliers, with gradual expansion to others.</p> <p>This methodology is outlined in the Corporate Due Diligence Policy and the Supplier Code of Conduct, and follows international frameworks (UNGP, OECD, OECD-FAO).</p> <p>An anonymous grievance mechanism is also available via the Ethics Open Line.</p> <p>Based on available documentation, low social risk is demonstrated for: Bulgaria, Czechia, Hungary, Latvia, Poland, Romania, and Slovakia.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Wheat gluten	Environmental	Denmark	<p>The company uses a risk assessment process that includes both abstract risks (e.g. geopolitical context, sector trends) and concrete risks (verified supplier-specific issues).</p> <p>When abstract risk is high, suppliers are asked to complete a questionnaire focused on social and environmental topics. Based on results, tailored action plans may be implemented, including audits, certifications, or training.</p> <p>Annual KPI reviews are submitted to the board to monitor effectiveness. The company prioritizes high-risk suppliers, with a phased approach for broader deployment.</p> <p>This process is detailed in the Corporate Due Diligence Policy and follows key frameworks such as the UNGP, OECD, and OECD-FAO guidelines.</p> <p>The company sources only certified wheat meeting the FSA Silver benchmark, ensuring independently audited sustainability standards beyond EU regulations.</p> <p>Based on documentation, low illegal risk is demonstrated for: Bulgaria, Czechia, Hungary, Poland, Romania, and Slovakia.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Rape seed Meal	Legal	Ukraine	<p>The company's Supplier Code of Conduct requires suppliers to work toward the eradication of child labor and maintains zero tolerance for forced or bonded labor. All suppliers must comply with the principles and due diligence obligations outlined in the company's Human Rights Policy.</p> <p>Suppliers are expected to uphold the safety, well-being, and dignity of all individuals contributing to the supply chain. This includes:</p> <ul style="list-style-type: none"> Conducting business in a way that protects health and safety Respecting the freedom of association without fear of retaliation Ensuring dignity and psychological safety in the workplace Providing fair, competitive, and equitable pay Complying with working hours and overtime laws Eliminating child and forced labor from all operations and supply chains Respecting land and tenure rights, especially for indigenous and minority groups <p>These expectations reflect the company's ongoing commitment to human rights across its value chain.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Rape seed Meal	Social	Ukraine	<p>The company's Supplier Code of Conduct requires all suppliers to work actively toward the eradication of child labour and has zero tolerance for forced or bonded labour. Suppliers must uphold the principles and due diligence requirements defined in the company's Human Rights Policy.</p> <p>The company expects suppliers to:</p> <ul style="list-style-type: none"> Ensure the health and safety of individuals impacted by their activities Respect workers' rights to form or join legally recognized labor organizations without intimidation or retaliation Promote dignity, inclusiveness, and emotional safety in the workplace Offer fair and equitable pay Comply with legal working hour standards, including overtime Eliminate child and forced labour across their operations and supply chains Respect land and tenure rights, with particular attention to indigenous peoples, local communities, and minority groups <p>These standards demonstrate the company's commitment to human rights, safety, and ethical labor practices across its value chain.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Rape seed Meal	Environmental	Ukraine	<p>The company's Supplier Code of Conduct implies that illegal practices, including illegal deforestation, are not acceptable. A large portion of rapeseed oil supplied is certified (e.g., ISCC, ISCC+, 285), which prohibits production on land with high conservation value (since 2008 for ISCC).</p> <p>The company follows a risk-based due diligence approach through a structured four-step process:</p> <ul style="list-style-type: none"> Identify and assess environmental and human rights risks Implement mitigation or remediation plans Monitor and track impact Communicate results internally or externally <p>A whistleblowing mechanism (Ethics Line) is in place. Reports are handled confidentially, investigated by trained staff, and appropriate corrective actions are taken. Protection from retaliation is guaranteed for both reporters and witnesses.</p> <p>These systems demonstrate that the company has robust processes to manage, mitigate, and reduce environmental and ethical risks in its supply chain.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Rape seed Meal	Legal	Romania	<p>The company's Supplier Code of Conduct requires suppliers to work toward the eradication of child labor and maintains zero tolerance for forced or bonded labor. All suppliers must comply with the principles and due diligence obligations outlined in the company's Human Rights Policy.</p> <p>Suppliers are expected to uphold the safety, well-being, and dignity of all individuals contributing to the supply chain. This includes:</p> <ul style="list-style-type: none"> Conducting business in a way that protects health and safety Respecting the freedom of association without fear of retaliation Ensuring dignity and psychological safety in the workplace Providing fair, competitive, and equitable pay Complying with working hours and overtime laws Eliminating child and forced labor from all operations and supply chains Respecting land and tenure rights, especially for indigenous and minority groups <p>These expectations reflect the company's ongoing commitment to human rights across its value chain.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Rape seed Meal	Social	Romania	<p>The company's Supplier Code of Conduct requires all suppliers to work actively toward the eradication of child labour and has zero tolerance for forced or bonded labour. Suppliers must uphold the principles and due diligence requirements defined in the company's Human Rights Policy.</p> <p>The company expects suppliers to:</p> <ul style="list-style-type: none"> Ensure the health and safety of individuals impacted by their activities Respect workers' rights to form or join legally recognized labor organizations without intimidation or retaliation Promote dignity, inclusiveness, and emotional safety in the workplace Offer fair and equitable pay Comply with legal working hour standards, including overtime Eliminate child and forced labour across their operations and supply chains Respect land and tenure rights, with particular attention to indigenous peoples, local communities, and minority groups <p>These standards demonstrate the company's commitment to human rights, safety, and ethical labor practices across its value chain.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/11/2024	Rape seed Meal	Environmental	Romania	<p>The company's Supplier Code of Conduct implies that illegal practices, including illegal deforestation, are not acceptable. A large portion of rapeseed oil supplied is certified (e.g., ISCC, ISCC+, 285), which prohibits production on land with high conservation value (since 2008 for ISCC).</p> <p>The company follows a risk-based due diligence approach through a structured four-step process:</p> <ul style="list-style-type: none"> Identify and assess environmental and human rights risks Implement mitigation or remediation plans Monitor and track impact Communicate results internally or externally <p>A whistleblowing mechanism (Ethics Line) is in place. Reports are handled confidentially, investigated by trained staff, and appropriate corrective actions are taken. Protection from retaliation is guaranteed for both reporters and witnesses.</p> <p>These systems demonstrate that the company has robust processes to manage, mitigate, and reduce environmental and ethical risks in its supply chain.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer assessment	01/06/2024	Guar Meal	Legal	India	<p>Factory license was produced by Greenfield and the oversight document by the Gujarat Pollution Control Board.</p> <p>Legal trading name and VAT registration is supplied.</p> <p>Factory Licence</p> <p>Gujarat Pollution Control Board</p> <p>GST Registration</p> <p>Company Registration Number</p>			

Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer assessment	01/06/2024	Guar Meal	Social	India	<p>The company has demonstrated compliance with labour standards through documented policies and procedures integrated into its human resources management system.</p> <p>Its Human Rights Policy explicitly prohibits forced or compulsory labour and the employment of individuals under 18. It also recognizes the right to freedom of association.</p> <p>During the audit, relevant documents were reviewed, including employment offers, staff identification and proof of age.</p> <p>A set of supporting policies was provided, confirming the company's commitment to ethical practices. These include: Human Rights Policy Hiring Policy Grievance Procedure Ethical Trading Initiative Base Code Statement Equal Pay Policy CSR Policy Anti-Bribery Policy Farmer & Worker Risk Assessment Sexual Harassment Procedure</p> <p>These policies indicate a structured and transparent approach to protecting worker rights and ensuring ethical employment practices across the organization.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer assessment	01/06/2024	Guar Meal	Environmental	India	<p>The factory has been rated as a "Green Company" by the Gujarat Pollution Control Board, with the certificate verified during the audit.</p> <p>The company has shared its Environmental Policy, confirming its environmental management approach.</p> <p>Key sustainability practices include: No water used during processing; the process involves drying, not adding water The facility runs on LNG (liquefied natural gas), a cleaner energy source Bags are reused, returned to suppliers for refilling No medicines are added during production A self-declaration of non-GMO status was provided</p> <p>These practices reflect the company's low environmental impact and commitment to responsible production.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer assessment	01/06/2024	Guar Meal	Legal	India	<p>Supplier has had a SMETA audit and completed corrective actions raised. Supplier was also audited by BioMar in 2024.</p> <p>According to Indian government agricultural statistics, the area under guar cultivation has been steadily declining since 2015. This trend is linked to reduced demand from the packing industry and inconsistent yields due to variable rainfall. Additionally, land fragmentation—caused by generational division of land—remains a long-standing issue, reinforcing the smallholder nature of guar farming and limiting scalability.</p> <p>These factors suggest that guar cultivation is not a driver of agricultural expansion or land conversion in the region. As such, it carries a low risk of illegal or unregulated land use and is considered to have a relatively low environmental footprint compared to more intensive crops.</p> <p>Regarding land governance, ownership is regulated through multiple official channels. Registration processes have been decentralized, including the deployment of mobile units to assist farmers. Various governmental bodies, such as the Department of Land Records, Revenue Department, Sub-Registrar's Office, and District Collector, oversee land registration and help ensure proper legal compliance.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer assessment	01/06/2024	Guar Meal	Social	India	<p>Supplier has had a SMETA audit and completed corrective actions raised. Supplier was also audited by BioMar in 2024.</p> <p>Labour in the agricultural sector may pose risks of child or bonded labour. However, online sources do not indicate that such issues are specific to the guar production sector, where the problem appears more concentrated in cotton, brick-making, and similar industries. Guar is a short-season, low-maintenance crop, and its cultivation is mostly done on smallholder plots, requiring minimal and seasonal labour. Without direct observation during peak periods like harvest, the presence of child or bonded labour cannot be definitively assessed.</p> <p>The Indian government has implemented various policies aimed at protecting rural labourers. Despite this, eradicating bonded or child labour in rural areas remains challenging due to widespread poverty, especially among landless labourers from scheduled castes, who are particularly vulnerable.</p> <p>Legally, the Bonded Labour System (Abolition) Act of 1976—amended in 1985—outlaws all forms of bonded labour, including for contract and migrant workers. The accompanying rehabilitation scheme has been restructured since 2016 to increase funding and ensure compensation is tied to the conviction of offenders, along with the creation of a district-level rehabilitation fund.</p> <p>Efforts to eliminate child labour also include national goals for universal access to free education. The government, in collaboration with organizations like UNICEF, is working to increase school enrolment and retention among rural children, particularly those from disadvantaged backgrounds such as scheduled castes and girls.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer assessment	01/06/2024	Guar Meal	Environmental	India	<p>Global Forest Watch mapping shows no tree cover in the guar production areas. The area of land under guar cultivation has been decreasing over the past 10 years. Therefore, we conclude there is a low risk that guar contributes to illegal deforestation.</p> <p>Guar supply chain map indicates that the guar is produced in areas of Rajasthan with districts with least forest cover.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer assessment	14/10/2024	Sunflower Meal	Legal	Hungary	<p>The primary raw materials originate from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries are rated as medium legal risk under Pathway 1*. To demonstrate low legal risk, Pathway 3** was applied, supported by the supplier's Code of Conduct. However, Pathway 4*** could not be used, as the sunflower meal received in 2023 was not covered by a sustainability certification (ISCC Plus), and no sunflower meal was received in 2024.</p> <p>The Supplier Code of Conduct outlines expectations for ethical and lawful practices, applicable to both direct and indirect suppliers, distributors, and agents. It includes mechanisms for addressing non-compliance, with the possibility of terminating relationships if corrective actions are not taken.</p> <p>Despite clearly defined expectations in the Supplier Code of Conduct, there is no evidence of how the supplier ensures its partners meet these requirements or how it verifies that raw materials do not originate from high-risk legal areas.</p> <p>Therefore, based on available documentation, low legal risk for sunflower originating from these countries cannot be confirmed.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer assessment	14/10/2024	Sunflower Meal	Social	Hungary	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine, which present medium social risk under Pathway 1*. Pathway 3** is selected to justify low social risk, as Pathway 4*** is not applicable due to the absence of relevant certification for sunflower meal.</p> <p>The Supplier Code of Conduct requires compliance with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines, the International Bill of Human Rights, and ILO core conventions. Forced and child labour are explicitly prohibited. Suppliers are encouraged to implement their own human rights policies aligned with these standards and ensure their sub-suppliers do the same.</p> <p>A grievance mechanism, the "Helpline," is available for reporting violations of the Code. Non-compliance may lead to termination of the business relationship if not remediated.</p> <p>The Code applies to direct and indirect suppliers, distributors, and agents. However, despite clear commitments, there is no evidence of concrete control measures or verification that suppliers meet the stated requirements or that raw materials do not come from high-risk areas.</p> <p>While Sedex reports confirm general social risks in Hungary, no specific issues related to sunflower production are identified. Therefore, based on available documentation, low social risk cannot be fully demonstrated.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer assessment	14/10/2024	Sunflower Meal	Environmental	Hungary	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries show low risk for legal deforestation/conversion (D/C) but medium risk for illegal D/C, thus Pathway 3** is selected to justify low environmental risk. Pathway 4*** is not applicable due to the lack of ISCC Plus certification for the sunflower meal received in 2023.</p> <p>The Supplier Code of Conduct references environmental and climate responsibility, aligned with the company's Environmental Responsibility Policy and Sustainable Development Goals. It includes commitments to no deforestation, protection of HCV and HCS areas, no-burning practices, and GHG emission reduction.</p> <p>The Land Use and Biodiversity Policy highlights the importance of preserving biodiversity, respecting smallholders and indigenous rights, and supporting efficient natural resource use, in line with the UN Declaration on the Rights of Indigenous Peoples.</p> <p>Suppliers must comply with the Supplier Code. Non-compliance may lead to engagement or termination of the business relationship. The Code applies to both direct and indirect suppliers. However, no concrete evidence is provided to show how compliance with these environmental principles is monitored or enforced, especially regarding raw material origin. Therefore, low risk of illegal deforestation/conversion cannot be fully demonstrated for sunflower sourced from the listed countries.</p> <p>Data from FAO and Eurostat show a decline in agricultural land in Hungary over the past 20 years, indicating low pressure from agriculture on deforestation.</p>			

Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Legal	Hungary		<p>The primary raw materials originate from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries are rated as medium legal risk under Pathway 1*. To demonstrate low legal risk, Pathway 3** was applied, supported by the supplier's Code of Conduct. However, Pathway 4*** could not be used, as the sunflower meal received in 2023 was not covered by a sustainability certification (ISCC Plus), and no sunflower meal was received in 2024.</p> <p>The Supplier Code of Conduct outlines expectations for ethical and lawful practices, applicable to both direct and indirect suppliers, distributors, and agents. It includes mechanisms for addressing non-compliance, with the possibility of terminating relationships if corrective actions are not taken.</p> <p>Despite clearly defined expectations in the Supplier Code of Conduct, there is no evidence of how the supplier ensures its partners meet these requirements or how it verifies that raw materials do not originate from high-risk legal areas.</p> <p>Therefore, based on available documentation, low legal risk for sunflower originating from these countries cannot be confirmed.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Social	Hungary		<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine, which present medium social risk under Pathway 1*. Pathway 3** is selected to justify low social risk, as Pathway 4*** is not applicable due to the absence of relevant certification for sunflower meal.</p> <p>The Supplier Code of Conduct requires compliance with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines, the International Bill of Human Rights, and ILO core conventions. Forced and child labour are explicitly prohibited. Suppliers are encouraged to implement their own human rights policies aligned with these standards and ensure their sub-suppliers do the same.</p> <p>A grievance mechanism, the "Helpline," is available for reporting violations of the Code. Non-compliance may lead to termination of the business relationship if not remediated.</p> <p>The Code applies to direct and indirect suppliers, distributors, and agents. However, despite clear commitments, there is no evidence of concrete control measures or verification that suppliers meet the stated requirements or that raw materials do not come from high-risk areas.</p> <p>While Sedex reports confirm general social risks in Hungary, no specific issues related to sunflower production are identified. Therefore, based on available documentation, low social risk cannot be fully demonstrated.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Environmental	Hungary		<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries show low risk for legal deforestation/conversion (D/C) but medium risk for illegal D/C, thus Pathway 3** is selected to justify low environmental risk. Pathway 4*** is not applicable due to the lack of ISCC Plus certification for the sunflower meal received in 2023.</p> <p>The Supplier Code of Conduct references environmental and climate responsibility, aligned with the company's Environmental Responsibility Policy and Sustainable Development Goals. It includes commitments to no deforestation, protection of HCV and HCS areas, no-burning practices, and GHG emission reduction.</p> <p>The Land Use and Biodiversity Policy highlights the importance of preserving biodiversity, respecting smallholders and indigenous rights, and supporting efficient natural resource use, in line with the UN Declaration on the Rights of Indigenous Peoples.</p> <p>Suppliers must comply with the Supplier Code. Non-compliance may lead to engagement or termination of the business relationship. The Code applies to both direct and indirect suppliers. However, no concrete evidence is provided to show how compliance with these environmental principles is monitored or enforced, especially regarding raw material origin. Therefore, low risk of illegal deforestation/conversion cannot be fully demonstrated for sunflower sourced from the listed countries.</p> <p>Data from FAO and Eurostat show a decline in agricultural land in Hungary over the past 20 years, indicating low pressure from agriculture on deforestation.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Legal	Croatia		<p>The primary raw materials originate from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries are rated as medium legal risk under Pathway 1*. To demonstrate low legal risk, Pathway 3** was applied, supported by the supplier's Code of Conduct. However, Pathway 4*** could not be used, as the sunflower meal received in 2023 was not covered by a sustainability certification (ISCC Plus), and no sunflower meal was received in 2024.</p> <p>The Supplier Code of Conduct outlines expectations for ethical and lawful practices, applicable to both direct and indirect suppliers, distributors, and agents. It includes mechanisms for addressing non-compliance, with the possibility of terminating relationships if corrective actions are not taken.</p> <p>Despite clearly defined expectations in the Supplier Code of Conduct, there is no evidence of how the supplier ensures its partners meet these requirements or how it verifies that raw materials do not originate from high-risk legal areas.</p> <p>Therefore, based on available documentation, low legal risk for sunflower originating from these countries cannot be confirmed.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Social	Croatia		<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine, which present medium social risk under Pathway 1*. Pathway 3** is selected to justify low social risk, as Pathway 4*** is not applicable due to the absence of relevant certification for sunflower meal.</p> <p>The Supplier Code of Conduct requires compliance with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines, the International Bill of Human Rights, and ILO core conventions. Forced and child labour are explicitly prohibited. Suppliers are encouraged to implement their own human rights policies aligned with these standards and ensure their sub-suppliers do the same.</p> <p>A grievance mechanism, the "Helpline," is available for reporting violations of the Code. Non-compliance may lead to termination of the business relationship if not remediated.</p> <p>The Code applies to direct and indirect suppliers, distributors, and agents. However, despite clear commitments, there is no evidence of concrete control measures or verification that suppliers meet the stated requirements or that raw materials do not come from high-risk areas.</p> <p>While Sedex reports confirm general social risks in Hungary, no specific issues related to sunflower production are identified. Therefore, based on available documentation, low social risk cannot be fully demonstrated.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Environmental	Croatia		<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries show low risk for legal deforestation/conversion (D/C) but medium risk for illegal D/C, thus Pathway 3** is selected to justify low environmental risk. Pathway 4*** is not applicable due to the lack of ISCC Plus certification for the sunflower meal received in 2023.</p> <p>The Supplier Code of Conduct references environmental and climate responsibility, aligned with the company's Environmental Responsibility Policy and Sustainable Development Goals. It includes commitments to no deforestation, protection of HCV and HCS areas, no-burning practices, and GHG emission reduction.</p> <p>The Land Use and Biodiversity Policy highlights the importance of preserving biodiversity, respecting smallholders and indigenous rights, and supporting efficient natural resource use, in line with the UN Declaration on the Rights of Indigenous Peoples.</p> <p>Suppliers must comply with the Supplier Code. Non-compliance may lead to engagement or termination of the business relationship. The Code applies to both direct and indirect suppliers. However, no concrete evidence is provided to show how compliance with these environmental principles is monitored or enforced, especially regarding raw material origin. Therefore, low risk of illegal deforestation/conversion cannot be fully demonstrated for sunflowers sourced from the listed countries.</p> <p>Data from FAO and Eurostat show a decline in agricultural land in Hungary over the past 20 years, indicating low pressure from agriculture on deforestation.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Legal	Poland		<p>The primary raw materials originate from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries are rated as medium legal risk under Pathway 1*. To demonstrate low legal risk, Pathway 3** was applied, supported by the supplier's Code of Conduct. However, Pathway 4*** could not be used, as the sunflower meal received in 2023 was not covered by a sustainability certification (ISCC Plus), and no sunflower meal was received in 2024.</p> <p>The Supplier Code of Conduct outlines expectations for ethical and lawful practices, applicable to both direct and indirect suppliers, distributors, and agents. It includes mechanisms for addressing non-compliance, with the possibility of terminating relationships if corrective actions are not taken.</p> <p>Despite clearly defined expectations in the Supplier Code of Conduct, there is no evidence of how the supplier ensures its partners meet these requirements or how it verifies that raw materials do not originate from high-risk legal areas.</p> <p>Therefore, based on available documentation, low legal risk for sunflower originating from these countries cannot be confirmed.</p>			

Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Social	Poland	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine, which present medium social risk under Pathway 1*. Pathway 3** is selected to justify low social risk, as Pathway 4*** is not applicable due to the absence of relevant certification for sunflower meal.</p> <p>The Supplier Code of Conduct requires compliance with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines, the International Bill of Human Rights, and ILO core conventions. Forced and child labour are explicitly prohibited. Suppliers are encouraged to implement their own human rights policies aligned with these standards and ensure their sub-suppliers do the same.</p> <p>A grievance mechanism, the "Helpline," is available for reporting violations of the Code. Non-compliance may lead to termination of the business relationship if not remediated.</p> <p>The Code applies to direct and indirect suppliers, distributors, and agents. However, despite clear commitments, there is no evidence of concrete control measures or verification that suppliers meet the stated requirements or that raw materials do not come from high-risk areas.</p> <p>While Sedex reports confirm general social risks in Hungary, no specific issues related to sunflower production are identified. Therefore, based on available documentation, low social risk cannot be fully demonstrated.</p>				
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Environmental	Poland	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries show low risk for legal deforestation/conversion (D/C) but medium risk for illegal D/C, thus Pathway 3** is selected to justify low environmental risk. Pathway 4*** is not applicable due to the lack of SCC Plus certification for the sunflower meal received in 2023.</p> <p>The Supplier Code of Conduct references environmental and climate responsibility, aligned with the company's Environmental Responsibility Policy and Sustainable Development Goals. It includes commitments to no deforestation, protection of HCV and HCS areas, no burning practices, and GHG emission reduction.</p> <p>The Land Use and Biodiversity Policy highlights the importance of preserving biodiversity, respecting smallholders and indigenous rights, and supporting efficient natural resource use, in line with the UN Declaration on the Rights of Indigenous Peoples.</p> <p>Suppliers must comply with the Supplier Code. Non-compliance may lead to engagement or termination of the business relationship. The Code applies to both direct and indirect suppliers. However, no concrete evidence is provided to show how compliance with these environmental principles is monitored or enforced, especially regarding raw material origin. Therefore, low risk of illegal deforestation/conversion cannot be fully demonstrated for sunflower sourced from the listed countries.</p> <p>Data from FAO and Eurostat show a decline in agricultural land in Hungary over the past 20 years, indicating low pressure from agriculture on deforestation.</p>				
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Legal	Romania	<p>The primary raw materials originate from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries are rated as medium legal risk under Pathway 1*. To demonstrate low legal risk, Pathway 3** was applied, supported by the supplier's Code of Conduct. However, Pathway 4*** could not be used, as the sunflower meal received in 2023 was not covered by a sustainability certification (ISCC Plus), and no sunflower meal was received in 2024.</p> <p>The Supplier Code of Conduct outlines expectations for ethical and lawful practices, applicable to both direct and indirect suppliers, distributors, and agents. It includes mechanisms for addressing non-compliance, with the possibility of terminating relationships if corrective actions are not taken.</p> <p>Despite clearly defined expectations in the Supplier Code of Conduct, there is no evidence of how the supplier ensures its partners meet these requirements or how it verifies that raw materials do not originate from high-risk legal areas.</p> <p>Therefore, based on available documentation, low legal risk for sunflower originating from these countries cannot be confirmed.</p>				
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Social	Romania	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine, which present medium social risk under Pathway 1*. Pathway 3** is selected to justify low social risk, as Pathway 4*** is not applicable due to the absence of relevant certification for sunflower meal.</p> <p>The Supplier Code of Conduct requires compliance with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines, the International Bill of Human Rights, and ILO core conventions. Forced and child labour are explicitly prohibited. Suppliers are encouraged to implement their own human rights policies aligned with these standards and ensure their sub-suppliers do the same.</p> <p>A grievance mechanism, the "Helpline," is available for reporting violations of the Code. Non-compliance may lead to termination of the business relationship if not remediated.</p> <p>The Code applies to direct and indirect suppliers, distributors, and agents. However, despite clear commitments, there is no evidence of concrete control measures or verification that suppliers meet the stated requirements or that raw materials do not come from high-risk areas.</p> <p>While Sedex reports confirm general social risks in Hungary, no specific issues related to sunflower production are identified. Therefore, based on available documentation, low social risk cannot be fully demonstrated.</p>				
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Environmental	Romania	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries show low risk for legal deforestation/conversion (D/C) but medium risk for illegal D/C, thus Pathway 3** is selected to justify low environmental risk. Pathway 4*** is not applicable due to the lack of SCC Plus certification for the sunflower meal received in 2023.</p> <p>The Supplier Code of Conduct references environmental and climate responsibility, aligned with the company's Environmental Responsibility Policy and Sustainable Development Goals. It includes commitments to no deforestation, protection of HCV and HCS areas, no burning practices, and GHG emission reduction.</p> <p>The Land Use and Biodiversity Policy highlights the importance of preserving biodiversity, respecting smallholders and indigenous rights, and supporting efficient natural resource use, in line with the UN Declaration on the Rights of Indigenous Peoples.</p> <p>Suppliers must comply with the Supplier Code. Non-compliance may lead to engagement or termination of the business relationship. The Code applies to both direct and indirect suppliers. However, no concrete evidence is provided to show how compliance with these environmental principles is monitored or enforced, especially regarding raw material origin. Therefore, low risk of illegal deforestation/conversion cannot be fully demonstrated for sunflower sourced from the listed countries.</p> <p>Data from FAO and Eurostat show a decline in agricultural land in Hungary over the past 20 years, indicating low pressure from agriculture on deforestation.</p>				
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Legal	Serbia	<p>The primary raw materials originate from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries are rated as medium legal risk under Pathway 1*. To demonstrate low legal risk, Pathway 3** was applied, supported by the supplier's Code of Conduct. However, Pathway 4*** could not be used, as the sunflower meal received in 2023 was not covered by a sustainability certification (ISCC Plus), and no sunflower meal was received in 2024.</p> <p>The Supplier Code of Conduct outlines expectations for ethical and lawful practices, applicable to both direct and indirect suppliers, distributors, and agents. It includes mechanisms for addressing non-compliance, with the possibility of terminating relationships if corrective actions are not taken.</p> <p>Despite clearly defined expectations in the Supplier Code of Conduct, there is no evidence of how the supplier ensures its partners meet these requirements or how it verifies that raw materials do not originate from high-risk legal areas.</p> <p>Therefore, based on available documentation, low legal risk for sunflower originating from these countries cannot be confirmed.</p>				
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Social	Serbia	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine, which present medium social risk under Pathway 1*. Pathway 3** is selected to justify low social risk, as Pathway 4*** is not applicable due to the absence of relevant certification for sunflower meal.</p> <p>The Supplier Code of Conduct requires compliance with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines, the International Bill of Human Rights, and ILO core conventions. Forced and child labour are explicitly prohibited. Suppliers are encouraged to implement their own human rights policies aligned with these standards and ensure their sub-suppliers do the same.</p> <p>A grievance mechanism, the "Helpline," is available for reporting violations of the Code. Non-compliance may lead to termination of the business relationship if not remediated.</p> <p>The Code applies to direct and indirect suppliers, distributors, and agents. However, despite clear commitments, there is no evidence of concrete control measures or verification that suppliers meet the stated requirements or that raw materials do not come from high-risk areas.</p> <p>While Sedex reports confirm general social risks in Hungary, no specific issues related to sunflower production are identified. Therefore, based on available documentation, low social risk cannot be fully demonstrated.</p>				

Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Environmental	Serbia	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries show low risk for legal deforestation/conversion (D/C) but medium risk for illegal D/C, thus Pathway 3** is selected to justify low environmental risk. Pathway 4*** is not applicable due to the lack of SCC Plus certification for the sunflower meal received in 2023.</p> <p>The Supplier Code of Conduct references environmental and climate responsibility, aligned with the company's Environmental Responsibility Policy and Sustainable Development Goals. It includes commitments to no deforestation, protection of HCV and HCS areas, no-burning practices, and GHG emission reduction.</p> <p>The Land Use and Biodiversity Policy highlights the importance of preserving biodiversity, respecting smallholders and indigenous rights, and supporting efficient natural resource use, in line with the UN Declaration on the Rights of Indigenous Peoples.</p> <p>Suppliers must comply with the Supplier Code. Non-compliance may lead to engagement or termination of the business relationship. The Code applies to both direct and indirect suppliers. However, no concrete evidence is provided to show how compliance with these environmental principles is monitored or enforced, especially regarding raw material origin. Therefore, low risk of illegal deforestation/conversion cannot be fully demonstrated for sunflower sourced from the listed countries.</p> <p>Data from FAO and Eurostat show a decline in agricultural land in Hungary over the past 20 years, indicating low pressure from agriculture on deforestation.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Legal	Slovakia	<p>The primary raw materials originate from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries are rated as medium legal risk under Pathway 1*. To demonstrate low legal risk, Pathway 3** was applied, supported by the supplier's Code of Conduct. However, Pathway 4*** could not be used, as the sunflower meal received in 2023 was not covered by a sustainability certification (ISCC Plus), and no sunflower meal was received in 2024.</p> <p>The Supplier Code of Conduct outlines expectations for ethical and lawful practices, applicable to both direct and indirect suppliers, distributors, and agents. It includes mechanisms for addressing non-compliance, with the possibility of terminating relationships if corrective actions are not taken.</p> <p>Despite clearly defined expectations in the Supplier Code of Conduct, there is no evidence of how the supplier ensures its partners meet these requirements or how it verifies that raw materials do not originate from high-risk legal areas.</p> <p>Therefore, based on available documentation, low legal risk for sunflower originating from these countries cannot be confirmed.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Social	Slovakia	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine, which present medium social risk under Pathway 1*. Pathway 3** is selected to justify low social risk, as Pathway 4*** is not applicable due to the absence of relevant certification for sunflower meal.</p> <p>The Supplier Code of Conduct requires compliance with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines, the International Bill of Human Rights, and ILO core conventions. Forced and child labour are explicitly prohibited. Suppliers are encouraged to implement their own human rights policies aligned with these standards and ensure their sub-suppliers do the same.</p> <p>A grievance mechanism, the "Helpline," is available for reporting violations of the Code. Non-compliance may lead to termination of the business relationship if not remediated.</p> <p>The Code applies to direct and indirect suppliers, distributors, and agents. However, despite clear commitments, there is no evidence of concrete control measures or verification that suppliers meet the stated requirements or that raw materials do not come from high-risk areas.</p> <p>While Sedex reports confirm general social risks in Hungary, no specific issues related to sunflower production are identified. Therefore, based on available documentation, low social risk cannot be fully demonstrated.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Environmental	Slovakia	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries show low risk for legal deforestation/conversion (D/C) but medium risk for illegal D/C, thus Pathway 3** is selected to justify low environmental risk. Pathway 4*** is not applicable due to the lack of SCC Plus certification for the sunflower meal received in 2023.</p> <p>The Supplier Code of Conduct references environmental and climate responsibility, aligned with the company's Environmental Responsibility Policy and Sustainable Development Goals. It includes commitments to no deforestation, protection of HCV and HCS areas, no-burning practices, and GHG emission reduction.</p> <p>The Land Use and Biodiversity Policy highlights the importance of preserving biodiversity, respecting smallholders and indigenous rights, and supporting efficient natural resource use, in line with the UN Declaration on the Rights of Indigenous Peoples.</p> <p>Suppliers must comply with the Supplier Code. Non-compliance may lead to engagement or termination of the business relationship. The Code applies to both direct and indirect suppliers. However, no concrete evidence is provided to show how compliance with these environmental principles is monitored or enforced, especially regarding raw material origin. Therefore, low risk of illegal deforestation/conversion cannot be fully demonstrated for sunflower sourced from the listed countries.</p> <p>Data from FAO and Eurostat show a decline in agricultural land in Hungary over the past 20 years, indicating low pressure from agriculture on deforestation.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Legal	Ukraine	<p>The primary raw materials originate from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries are rated as medium legal risk under Pathway 1*. To demonstrate low legal risk, Pathway 3** was applied, supported by the supplier's Code of Conduct. However, Pathway 4*** could not be used, as the sunflower meal received in 2023 was not covered by a sustainability certification (ISCC Plus), and no sunflower meal was received in 2024.</p> <p>The Supplier Code of Conduct outlines expectations for ethical and lawful practices, applicable to both direct and indirect suppliers, distributors, and agents. It includes mechanisms for addressing non-compliance, with the possibility of terminating relationships if corrective actions are not taken.</p> <p>Despite clearly defined expectations in the Supplier Code of Conduct, there is no evidence of how the supplier ensures its partners meet these requirements or how it verifies that raw materials do not originate from high-risk legal areas.</p> <p>Therefore, based on available documentation, low legal risk for sunflower originating from these countries cannot be confirmed.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Social	Ukraine	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine, which present medium social risk under Pathway 1*. Pathway 3** is selected to justify low social risk, as Pathway 4*** is not applicable due to the absence of relevant certification for sunflower meal.</p> <p>The Supplier Code of Conduct requires compliance with international standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines, the International Bill of Human Rights, and ILO core conventions. Forced and child labour are explicitly prohibited. Suppliers are encouraged to implement their own human rights policies aligned with these standards and ensure their sub-suppliers do the same.</p> <p>A grievance mechanism, the "Helpline," is available for reporting violations of the Code. Non-compliance may lead to termination of the business relationship if not remediated.</p> <p>The Code applies to direct and indirect suppliers, distributors, and agents. However, despite clear commitments, there is no evidence of concrete control measures or verification that suppliers meet the stated requirements or that raw materials do not come from high-risk areas.</p> <p>While Sedex reports confirm general social risks in Hungary, no specific issues related to sunflower production are identified. Therefore, based on available documentation, low social risk cannot be fully demonstrated.</p>			
Pathway 3 Ingredient Manufacturer assessment	Plant Primary Raw Material	14/10/2024	Sunflower Meal	Environmental	Ukraine	<p>Primary raw materials are sourced from Croatia, Hungary, Poland, Romania, Serbia, Slovakia, and Ukraine. These countries show low risk for legal deforestation/conversion (D/C) but medium risk for illegal D/C, thus Pathway 3** is selected to justify low environmental risk. Pathway 4*** is not applicable due to the lack of SCC Plus certification for the sunflower meal received in 2023.</p> <p>The Supplier Code of Conduct references environmental and climate responsibility, aligned with the company's Environmental Responsibility Policy and Sustainable Development Goals. It includes commitments to no deforestation, protection of HCV and HCS areas, no-burning practices, and GHG emission reduction.</p> <p>The Land Use and Biodiversity Policy highlights the importance of preserving biodiversity, respecting smallholders and indigenous rights, and supporting efficient natural resource use, in line with the UN Declaration on the Rights of Indigenous Peoples.</p> <p>Suppliers must comply with the Supplier Code. Non-compliance may lead to engagement or termination of the business relationship. The Code applies to both direct and indirect suppliers. However, no concrete evidence is provided to show how compliance with these environmental principles is monitored or enforced, especially regarding raw material origin. Therefore, low risk of illegal deforestation/conversion cannot be fully demonstrated for sunflower sourced from the listed countries.</p> <p>Data from FAO and Eurostat show a decline in agricultural land in Hungary over the past 20 years, indicating low pressure from agriculture on deforestation.</p>			

Pathway 3 Ingredient Manufacturer assessment	Ingredient manufacturer	12/12/2023	Fish meal	Social	South africa	<p>The company requires all its suppliers to sign a Supplier Code of Conduct, which includes a strict prohibition of child labour in line with ILO Convention 138.</p> <p>The company operates 11 fishing vessels directly, meaning crew members are its employees. It also contracts an external fishing company to catch part of its quota.</p> <p>All fishing vessels operating in South African waters must undergo annual inspections by SAMSA (South African Maritime Safety Authority). Documentation reviewed includes a vessel's SAMSA safety inspection certificate and the associated inspection checklist.</p> <p>The checklist contains a Crew Agreement section, requiring access to employment contracts detailing age, payment terms, and working conditions. This reflects direct oversight from the South African government regarding crew employment standards through regulatory safety inspections.</p> <p>In addition to safety checks, government-appointed observers may conduct unannounced visits to verify catch volumes and ensure accurate quota reporting. This mechanism enhances transparency and accountability in the supply chain.</p> <p>These systems collectively indicate a structured approach to ensure legal compliance, worker protection, and responsible fisheries management.</p>			
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	12/12/2023	Atlantic horse mackerel (Trachurus trachurus)	Social	Fishery	<p>The company requires all its suppliers to sign a Supplier Code of Conduct, which includes a strict prohibition of child labour in line with ILO Convention 138.</p> <p>The company operates 11 fishing vessels directly, meaning crew members are its employees. It also contracts an external fishing company to catch part of its quota.</p> <p>All fishing vessels operating in South African waters must undergo annual inspections by SAMSA (South African Maritime Safety Authority). Documentation reviewed includes a vessel's SAMSA safety inspection certificate and the associated inspection checklist.</p> <p>The checklist contains a Crew Agreement section, requiring access to employment contracts detailing age, payment terms, and working conditions. This reflects direct oversight from the South African government regarding crew employment standards through regulatory safety inspections.</p> <p>In addition to safety checks, government-appointed observers may conduct unannounced visits to verify catch volumes and ensure accurate quota reporting. This mechanism enhances transparency and accountability in the supply chain.</p> <p>These systems collectively indicate a structured approach to ensure legal compliance, worker protection, and responsible fisheries management.</p>			
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	12/12/2023	Chub mackerel (Scomber japonicus)	Social	Fishery	<p>The company requires all its suppliers to sign a Supplier Code of Conduct, which includes a strict prohibition of child labour in line with ILO Convention 138.</p> <p>The company operates 11 fishing vessels directly, meaning crew members are its employees. It also contracts an external fishing company to catch part of its quota.</p> <p>All fishing vessels operating in South African waters must undergo annual inspections by SAMSA (South African Maritime Safety Authority). Documentation reviewed includes a vessel's SAMSA safety inspection certificate and the associated inspection checklist.</p> <p>The checklist contains a Crew Agreement section, requiring access to employment contracts detailing age, payment terms, and working conditions. This reflects direct oversight from the South African government regarding crew employment standards through regulatory safety inspections.</p> <p>In addition to safety checks, government-appointed observers may conduct unannounced visits to verify catch volumes and ensure accurate quota reporting. This mechanism enhances transparency and accountability in the supply chain.</p> <p>These systems collectively indicate a structured approach to ensure legal compliance, worker protection, and responsible fisheries management.</p>			
Pathway 2 Ingredient Manufacturer assessment	Marine Primary Raw Material	12/12/2023	White's head round herring (Etrumeus whitehead)	Social	Fishery	<p>The Faroese fisheries sector is described as highly regulated and structured according to the Nordic welfare model. Workers and fishers are employed under collective agreements negotiated with Faroese unions, ensuring fair wage conditions. This framework is considered effective in supporting decent work and encouraging recruitment into the industry.</p> <p>Employment practices in the sector benefit from strong union representation and favourable labour standards. The presence of active wage negotiations contributes to maintaining social compliance.</p> <p>Maritime oversight is reinforced by inspection and rescue vessels operating in Faroese waters, in collaboration with Danish naval patrols. This regular patrol presence provides continuous monitoring and supports safety and compliance at sea.</p> <p>Additionally, under the revised MarinTrust standard (Version 3), fishmeal and fish oil producers will be required to conduct Social Risk Assessments with their whole fish suppliers. This will become mandatory from May 2025, coinciding with the recertification timeline for existing production facilities.</p> <p>These elements suggest that the Faroese fishing sector is structured to minimise social risks, with established regulatory controls, fair labour practices, and forthcoming certification enhancements.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer	14/11/2023	Fish meal	Social	Denmark	<p>The Faroese fisheries sector is described as highly regulated and structured according to the Nordic welfare model. Workers and fishers are employed under collective agreements negotiated with Faroese unions, ensuring fair wage conditions. This framework is considered effective in supporting decent work and encouraging recruitment into the industry.</p> <p>Employment practices in the sector benefit from strong union representation and favourable labour standards. The presence of active wage negotiations contributes to maintaining social compliance.</p> <p>Maritime oversight is reinforced by inspection and rescue vessels operating in Faroese waters, in collaboration with Danish naval patrols. This regular patrol presence provides continuous monitoring and supports safety and compliance at sea.</p> <p>Additionally, under the revised MarinTrust standard (Version 3), fishmeal and fish oil producers will be required to conduct Social Risk Assessments with their whole fish suppliers. This will become mandatory from May 2025, coinciding with the recertification timeline for existing production facilities.</p> <p>These elements suggest that the Faroese fishing sector is structured to minimise social risks, with established regulatory controls, fair labour practices, and forthcoming certification enhancements.</p>			
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	14/11/2023	Blue whiting (Micromesistius poutasou)	Social	Fishery	<p>The Faroese fisheries sector is described as highly regulated and structured according to the Nordic welfare model. Workers and fishers are employed under collective agreements negotiated with Faroese unions, ensuring fair wage conditions. This framework is considered effective in supporting decent work and encouraging recruitment into the industry.</p> <p>Employment practices in the sector benefit from strong union representation and favourable labour standards. The presence of active wage negotiations contributes to maintaining social compliance.</p> <p>Maritime oversight is reinforced by inspection and rescue vessels operating in Faroese waters, in collaboration with Danish naval patrols. This regular patrol presence provides continuous monitoring and supports safety and compliance at sea.</p> <p>Additionally, under the revised MarinTrust standard (Version 3), fishmeal and fish oil producers will be required to conduct Social Risk Assessments with their whole fish suppliers. This will become mandatory from May 2025, coinciding with the recertification timeline for existing production facilities.</p> <p>These elements suggest that the Faroese fishing sector is structured to minimise social risks, with established regulatory controls, fair labour practices, and forthcoming certification enhancements.</p>			
Pathway 3 Ingredient Manufacturer assessment	Ingredient Manufacturer	14/11/2023	Fish meal	Social	Denmark	<p>Crew requirements and competencies in this supply chain are regulated by the Danish Maritime Authority, which mandates valid health certificates and appropriate training for all crew members.</p> <p>The Danish Fisheries Agency operates enforcement vessels that conduct inspections at sea, with findings publicly reported each year. This regulatory oversight adds transparency and accountability to fishing operations.</p> <p>Denmark is considered a low-risk country for modern slavery within the fishing sector, as referenced in ongoing academic research examining links between modern slavery and fishing practices.</p> <p>According to the updated MarinTrust standard (Version 3), fishmeal and fish oil producers will be required to perform a Social Risk Assessment for their whole fish suppliers. This new requirement will be enforced starting May 2025, coinciding with factory recertification timelines.</p> <p>An action point identified is to confirm whether the Danish Fisheries Agency inspects crew documentation, including employment terms, during its sea-based inspections.</p> <p>Overall, the combination of regulatory requirements, public reporting, and international certification frameworks suggests a strong structure to minimize social risks in the Danish fisheries sector.</p>			

Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	14/11/2023	European sprat (Sprattus sprattus)	Social	Fishery	<p>Crew requirements and competencies in this supply chain are regulated by the Danish Maritime Authority, which mandates valid health certificates and appropriate training for all crew members.</p> <p>The Danish Fisheries Agency operates enforcement vessels that conduct inspections at sea, with findings publicly reported each year. This regulatory oversight adds transparency and accountability to fishing operations.</p> <p>Denmark is considered a low-risk country for modern slavery within the fishing sector, as referenced in ongoing academic research examining links between modern slavery and fishing practices.</p> <p>According to the updated MarInTrust standard (Version 3), fishmeal and fish oil producers will be required to perform a Social Risk Assessment for their whole fish suppliers. This new requirement will be enforced starting May 2025, coinciding with factory recertification timelines.</p> <p>An action point identified is to confirm whether the Danish Fisheries Agency inspects crew documentation, including employment terms, during its sea-based inspections.</p> <p>Overall, the combination of regulatory requirements, public reporting, and international certification frameworks suggests a strong structure to minimize social risks in the Danish fisheries sector.</p>			
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	14/11/2023	Blue whiting (Micromesistius poussassou)	Social	Fishery	<p>Crew requirements and competencies in this supply chain are regulated by the Danish Maritime Authority, which mandates valid health certificates and appropriate training for all crew members.</p> <p>The Danish Fisheries Agency operates enforcement vessels that conduct inspections at sea, with findings publicly reported each year. This regulatory oversight adds transparency and accountability to fishing operations.</p> <p>Denmark is considered a low-risk country for modern slavery within the fishing sector, as referenced in ongoing academic research examining links between modern slavery and fishing practices.</p> <p>According to the updated MarInTrust standard (Version 3), fishmeal and fish oil producers will be required to perform a Social Risk Assessment for their whole fish suppliers. This new requirement will be enforced starting May 2025, coinciding with factory recertification timelines.</p> <p>An action point identified is to confirm whether the Danish Fisheries Agency inspects crew documentation, including employment terms, during its sea-based inspections.</p> <p>Overall, the combination of regulatory requirements, public reporting, and international certification frameworks suggests a strong structure to minimize social risks in the Danish fisheries sector.</p>			
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	14/11/2023	Atlantic herring (Clupea harengus)	Social	Fishery	<p>Crew requirements and competencies in this supply chain are regulated by the Danish Maritime Authority, which mandates valid health certificates and appropriate training for all crew members.</p> <p>The Danish Fisheries Agency operates enforcement vessels that conduct inspections at sea, with findings publicly reported each year. This regulatory oversight adds transparency and accountability to fishing operations.</p> <p>Denmark is considered a low-risk country for modern slavery within the fishing sector, as referenced in ongoing academic research examining links between modern slavery and fishing practices.</p> <p>According to the updated MarInTrust standard (Version 3), fishmeal and fish oil producers will be required to perform a Social Risk Assessment for their whole fish suppliers. This new requirement will be enforced starting May 2025, coinciding with factory recertification timelines.</p> <p>An action point identified is to confirm whether the Danish Fisheries Agency inspects crew documentation, including employment terms, during its sea-based inspections.</p> <p>Overall, the combination of regulatory requirements, public reporting, and international certification frameworks suggests a strong structure to minimize social risks in the Danish fisheries sector.</p>			
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	14/11/2023	Atlantic mackerel (Scomber scombrus)	Social	Fishery	<p>Crew requirements and competencies in this supply chain are regulated by the Danish Maritime Authority, which mandates valid health certificates and appropriate training for all crew members.</p> <p>The Danish Fisheries Agency operates enforcement vessels that conduct inspections at sea, with findings publicly reported each year. This regulatory oversight adds transparency and accountability to fishing operations.</p> <p>Denmark is considered a low-risk country for modern slavery within the fishing sector, as referenced in ongoing academic research examining links between modern slavery and fishing practices.</p> <p>According to the updated MarInTrust standard (Version 3), fishmeal and fish oil producers will be required to perform a Social Risk Assessment for their whole fish suppliers. This new requirement will be enforced starting May 2025, coinciding with factory recertification timelines.</p> <p>An action point identified is to confirm whether the Danish Fisheries Agency inspects crew documentation, including employment terms, during its sea-based inspections.</p> <p>Overall, the combination of regulatory requirements, public reporting, and international certification frameworks suggests a strong structure to minimize social risks in the Danish fisheries sector.</p>			
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	14/11/2023	Cod (Gadus morhua)	Social	Fishery	<p>Crew requirements and competencies in this supply chain are regulated by the Danish Maritime Authority, which mandates valid health certificates and appropriate training for all crew members.</p> <p>The Danish Fisheries Agency operates enforcement vessels that conduct inspections at sea, with findings publicly reported each year. This regulatory oversight adds transparency and accountability to fishing operations.</p> <p>Denmark is considered a low-risk country for modern slavery within the fishing sector, as referenced in ongoing academic research examining links between modern slavery and fishing practices.</p> <p>According to the updated MarInTrust standard (Version 3), fishmeal and fish oil producers will be required to perform a Social Risk Assessment for their whole fish suppliers. This new requirement will be enforced starting May 2025, coinciding with factory recertification timelines.</p> <p>An action point identified is to confirm whether the Danish Fisheries Agency inspects crew documentation, including employment terms, during its sea-based inspections.</p> <p>Overall, the combination of regulatory requirements, public reporting, and international certification frameworks suggests a strong structure to minimize social risks in the Danish fisheries sector.</p>			
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	14/11/2023	European plaice (Pleuronectes platessa)	Social	Fishery	<p>Crew requirements and competencies in this supply chain are regulated by the Danish Maritime Authority, which mandates valid health certificates and appropriate training for all crew members.</p> <p>The Danish Fisheries Agency operates enforcement vessels that conduct inspections at sea, with findings publicly reported each year. This regulatory oversight adds transparency and accountability to fishing operations.</p> <p>Denmark is considered a low-risk country for modern slavery within the fishing sector, as referenced in ongoing academic research examining links between modern slavery and fishing practices.</p> <p>According to the updated MarInTrust standard (Version 3), fishmeal and fish oil producers will be required to perform a Social Risk Assessment for their whole fish suppliers. This new requirement will be enforced starting May 2025, coinciding with factory recertification timelines.</p> <p>An action point identified is to confirm whether the Danish Fisheries Agency inspects crew documentation, including employment terms, during its sea-based inspections.</p> <p>Overall, the combination of regulatory requirements, public reporting, and international certification frameworks suggests a strong structure to minimize social risks in the Danish fisheries sector.</p>			
Pathway 3 Ingredient Manufacturer assessment	Marine Primary Raw Material	14/11/2023	Boarfish (Capros aper)	Social	Fishery	<p>Crew requirements and competencies in this supply chain are regulated by the Danish Maritime Authority, which mandates valid health certificates and appropriate training for all crew members.</p> <p>The Danish Fisheries Agency operates enforcement vessels that conduct inspections at sea, with findings publicly reported each year. This regulatory oversight adds transparency and accountability to fishing operations.</p> <p>Denmark is considered a low-risk country for modern slavery within the fishing sector, as referenced in ongoing academic research examining links between modern slavery and fishing practices.</p> <p>According to the updated MarInTrust standard (Version 3), fishmeal and fish oil producers will be required to perform a Social Risk Assessment for their whole fish suppliers. This new requirement will be enforced starting May 2025, coinciding with factory recertification timelines.</p> <p>An action point identified is to confirm whether the Danish Fisheries Agency inspects crew documentation, including employment terms, during its sea-based inspections.</p> <p>Overall, the combination of regulatory requirements, public reporting, and international certification frameworks suggests a strong structure to minimize social risks in the Danish fisheries sector.</p>			