



GREENYARD

DUE DILIGENCE POLICY

Table of Contents

Table of Contents	2
1 Introduction.....	3
1.1 Development Due Diligence approach	3
1.2 Company structure	4
1.3 Sourcing structure.....	5
2 Policies & management system	5
2.1 Governance.....	5
2.2 Materiality matrix	6
2.3 Responsible business	7
2.4 Responsible sourcing	7
2.5 Training	8
2.6 Multi-stakeholder initiatives.....	8
3 Risk assessment.....	8
3.1 Own operations.....	8
3.2 Supply chain.....	9
4 Prevention & mitigation measures	10
4.1 Own operations.....	10
4.2 Supply chain	10
4.3 Deal breakers	10
5 Tracking implementation and results.....	11
6 Communication & reporting	11
7 Grievance mechanism	11
7.1 Greenyard Whistleblower Tool.....	12
7.2 Grievance mechanisms for the supply chain	12
8 Future developments in terms of due diligence	12

1 Introduction

1.1 Development Due Diligence approach

Greenyard is a company with a clear purpose and ambition: we want to improve life through pure-plant food experiences, enabling healthier lifestyles while ensuring more sustainable food supply chains.

As a global market leader in fruits & vegetables, we are fully aware of our responsibilities within the food value chain regarding the products and services we deliver to our customers as well towards all other involved stakeholders in our value chain. We continually shape our response to assess and mitigate risks in our own operations and supply chains, working daily to meet all our legal, regulatory, ethical, environmental, social, and health and safety obligations.

Our food suppliers in high and medium risk countries are certified against social and/or environmental standards, which we consider a solid foundation. We acknowledge this is only a first step in a journey to address certain issues and are setting up processes to better map and mitigate social and environmental risks throughout the supply chain, also known as a due diligence approach.

In 2022 Greenyard started to formalize its sustainability due diligence approach by developing its Supplier Code of Conduct alongside its Code of Conduct for its employees. This document summarises the current state of play and Group priorities for the near future, in full awareness that stakeholders' expectations regarding due diligence remain dynamic.

Our Due Diligence approach focuses both on the own operations and supply chain (direct and indirect spend) and considers both environmental and social sustainability aspects. It is inspired by both the due diligence framework laid down in the OECD Guidelines for Multinational Enterprises as well as guidance provided by international instruments dealing with human rights and responsible business conduct.

Greenyard recognizes and adheres to the following instruments:

- the UN Global Compact and UN Sustainable Development Goals (SDGs);
- the Universal Declaration of Human Rights;
- the UN Guiding Principles on Business and Human Rights;
- the UN Convention of the Rights of the Child;
- the UN Convention on the Elimination of All Forms of Discrimination against Women;
- the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work;
- the OECD Guidelines for Multinational Enterprises;
- the OECD-FAO Guidance for Responsible Agricultural Supply Chains;
- the EU code of conduct on responsible food business and marketing practices;
- Regulation (EU) 2023/1115 on deforestation-free products; and
- Directive (EU) 2024/1760 on Corporate Sustainability Due Diligence ("CSDDD").

In further shaping and implementing our approach we closely work with various stakeholders, such as government, clients, industry associations, multi-stakeholder initiatives and suppliers. Due diligence is a journey on which we will report more intensively through our annual report as well as industry benchmarks (e.g. EcoVadis, SEDEX).

1.2 Company structure

Greenyard is a global market leader of fresh, frozen and prepared fruit and vegetables, flowers and plants. Counting Europe's leading retailers amongst its customer base, Greenyard provides efficient and sustainable solutions to customers and suppliers through best-in-class products, market leading innovation, operational excellence and outstanding service.

With ca 8,600 employees operating in 20 countries worldwide, Greenyard identifies its people and key customer and supplier relationships as the key assets which enable it to deliver goods and services worth ca. €5,1 billion per annum.

Greenyard consists of three divisions:

Greenyard Fresh is a global market leader in the distribution of fresh fruit and vegetables. The world's largest food retailers rely on us every day for a steady, high-quality supply of fresh produce to their stores. The Fresh division operates from 25 service centres in Europe and the US connecting its worldwide network of growers with its customers. It represents 81% of the company's turnover and handles approximately 2 million ton of fruit and vegetables.

Greenyard Prepared processes freshly harvested fruit and vegetables into preserved and prepared food products catering for the needs of modern-day consumers. The division offers customers a wide variety of preserved fruit and vegetables, packaged in glass, cans, pouches or foil for maximum convenience and easy preparation. It has also developed an extended range of ready-to-eat food products, including sauces, soups and dips. The Prepared division operates 2 processing sites in Belgium and represents 6% of the company's turnover. It sells approximately 250.000 ton of preserved food products.

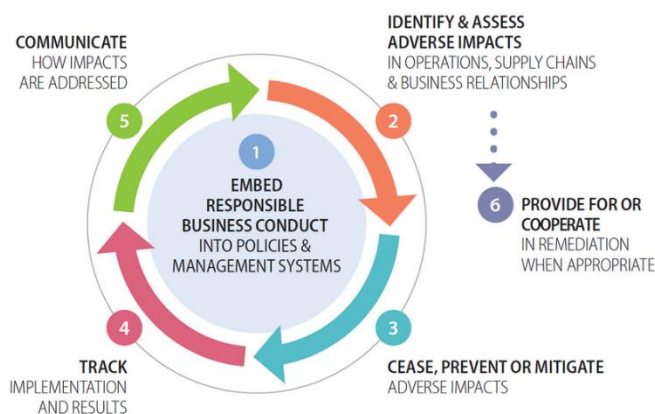
Greenyard Frozen is a pioneer and market leader in processing freshly harvested fruit and vegetables into frozen food products that are easy to store and take little or no time to prepare. State-of-the-art instant freezing technology captures the ingredients at the peak of perfection, preserving colour, texture, flavour and nutrients, until consumers are ready to enjoy them. It also produces a range of convenience products and pure-plant ice cream. The Frozen division operates 11 processing sites in Europe and represents 13% of the company's turnover. It sells approximately 485.000 ton of frozen fruit and vegetables along with a range of ready-to-eat products.

1.3 Sourcing structure

At Greenyard, we source our fresh produce and food products from a worldwide network of growers and suppliers. We have built strong and long-term relationships with many of them, resulting in a steady supply of high-quality products for our customers. Most frozen and prepared products come from fields within 100 kilometres of our processing sites. For those products that need to travel longer distances from field to market, we focus on the closest and the best growing regions. We source over 2,600,000 tonnes of fruit and vegetables from 90 countries, of which around 65% from the EU and UK.

Greenyard currently prioritises fresh produce and food products as part of its supply chain Due diligence approach. They represent a higher risk compared to indirect spend categories (e.g. packaging, transport) which will be covered in a forthcoming update of our Due diligence policy and latest in 2026.

The next chapters provide further details on each of the 6 steps in our Due diligence approach which follows the due diligence framework laid down in the OECD Guidelines for multinational enterprises.



2 Policies & management system

This chapter describes how Greenyard's sustainability policy is embedded in the organisation, how this is reflected in the sourcing requirements and external initiatives in which Greenyard takes part.

2.1 Governance

Greenyard's CEO is ultimately responsible for the company's sustainability strategy. He manages the vision, strategy and governance of sustainability; approves group programs, overall targets and means; and updates the Board of Directors on Greenyard's priorities and performance. The Group Sustainability, Quality & Safety Director coordinates sustainability efforts at group level and reports to the CEO. The coordination is structured through a Sustainability Committee involving representatives from various divisions and key entities as well as senior corporate positions (e.g. HR, Sourcing, Procurement).

Sustainability is embedded in Greenyard's mission and strategy and laid down in a roadmap including time-bound targets. The implementation of the sustainability roadmap is among the performance areas on which Greenyard's executives and managing directors are yearly evaluated. Since FY2022-23 the incentives for the executive management and managing directors are coupled to the implementation of the sustainability roadmap. All colleagues who, in their daily work, have an influence on making our product range and business operations more sustainable therefore have an active role in working towards our objectives.

The implementation of the sustainability roadmap is also structurally embedded in the agenda of Greenyard's Leadership Team consisting of the CEO, CFO, Divisional Managing Directors and key corporate functions. Progress is reported on a quarterly basis and shared with the Board of Directors as well.

In terms of due diligence a Group Sustainability Due Diligence Committee ("GSDDC") has been established covering the 3 compliance areas: own operations, direct spend, indirect spend. The GSDDC is jointly responsible for the overall compliance with the prevailing policies and legislation including the EU CSDDD. It is composed of the Divisional Managing Directors, Group HR Director, Group Procurement Director and Group Sustainability, Quality and Health & Safety Director. As a committee they approve relevant policies regarding sustainability due diligence and provide guidance on upcoming issues. The GSDDC discusses the most relevant cases and non-compliances emerging from in- or external audits or that are brought up via the whistleblowing tools and takes remediation actions when needed.

2.2 Materiality matrix

Material topics are based on Greenyard's Double Materiality assessment ("DMA") which guides our sustainability strategy. The DMA helps to prioritise the ESG issues that matter most to all stakeholders and have the biggest impact both on our own business model and on society. It has been updated in 2023 and is in line with the new EU Corporate Sustainability Reporting Directive ("CSRD") requirements. The latest version of the DMA, Greenyard's sustainability roadmap and the performance against key targets are available in the [Annual Report](#), which is published on our website.

The material topics were determined by examining relevant third-party ESG ratings, disclosure standards, trend reports, analyses of reports by peer companies, as well as Greenyard's own analyses and documentation. Interviews with all stakeholders, such as: customers, suppliers, banks, growers and management, and workshops with employees have been used to determine the impact and importance and complete the assessment.

Greenyard's material topics:

- Food safety, quality & traceability
- Responsible Sourcing & Human Rights
- Climate Change Adaption & Mitigation
- Sustainable Agriculture & Biodiversity
- Water Stewardship
- Business ethics & Corporate governance
- Occupational Health & Safety
- Impactful innovation & New technologies
- Talent Growth, Diversity & Inclusion
- Health & Nutrition
- Food Waste & Circular Economy

2.3 Responsible business

Greenyard's Code of Conduct describes the way in which we expect our employees to comply with Greenyard's values and ethical principles on a daily basis. Pointing out the business ethics, legal compliance topics, company values and giving clear guidance on the behaviour that is expected from all Greenyard employees. All employees complete a regular training on the Code of Conduct and sign for compliance with these guidelines.

Other Group policies and procedures which are derived from the Code of Conduct include:

- Anti-Bribery & Corruption Policy
- Competition Law Compliance Policy
- Diversity & Inclusion Statement
- Health & Safety Policy
- Human Rights Policy
- Quality & Food Safety Policy

2.4 Responsible sourcing

Through Greenyard's Supplier Code of Conduct we hold our supply chain partners to the same standards as we hold ourselves. It applies to all suppliers of Greenyard and enables us to engage on material sustainability issues relating to their operations.

It sets minimum standards for suppliers allowing Greenyard to gather insights into the value chain as well as support and evaluate supplier's adherence to these objectives. Compliance to this Supplier Code of Conduct is a pre-requisite of any agreement/contract between Greenyard and its Suppliers.

Where Greenyard customers' requirements are stricter or more comprehensive, these will be stipulated in local policies or agreements specific to the contracting business unit.

2.5 Training

Employees follow a mandatory training on ethical conduct (Greenyard Code of Conduct e-learning). Trainings are repeated frequently and in case the Code of Conduct is updated. Elsewhere relevant employee groups receive additional training in terms of the above mentioned Greenyard policies. The trainings ensure employees have the necessary knowledge and expertise, so than they can anticipate issues of concern.

2.6 Multi-stakeholder initiatives

Greenyard recognises that certain issues are too complex to deal with by itself, let alone its individual suppliers. Multi-stakeholder initiatives bringing together value chain partners, governments and civil society offer opportunities to structurally tackle complex issues and enable lasting improvements to the sector's sustainability. Greenyard is a member of the Sustainability Initiative for Fruit and Vegetables ([SIFAV](#)) and the Floriculture Sustainability Initiative ([FSI](#)). Both initiatives feature ambitious sustainability goals towards 2025 and we are actively engaged in shaping a strategy towards 2030. Both initiatives shape the sustainable sourcing strategies and projects of Greenyard.

By setting up baskets of approved social and water standards, SIFAV and FSI are also aiming to drive harmonization, to support alignment of market requirements to best practices and to promote transparency and comparability. The baskets provide choice for supply chain actors ultimately resulting in higher efficiency, lower costs, and less audit duplications.

3 Risk assessment

This chapter describes how Greenyard identifies and assesses risks and negative impacts in our own operations and supply chain. While Greenyard's enterprise risk management process evaluates general risks, including social and environmental risks, the due diligence process lays down a more granular approach looking into specific human rights, social and environmental risks.

3.1 Own operations

Greenyard is a member of the Supplier Ethical Data Exchange (SEDEX) and uses the SEDEX Self-assessment questionnaires (SAQ) to evaluate the inherent risks of all its sites along with the implementation level of the local risk management controls. The SEDEX SAQ focuses on 15 risk dimensions: company profile, workplace impact, management systems, freely chosen employment, freedom of association, health & safety, living accommodation, children & young workers, wages, working hours, discrimination, regular employment, discipline & grievance, environment and business ethics.

SEDEX's Risk assessment matrix provides insights in the inherent and site characteristic risk scores of all Greenyard sites. Sites with a high overall risk score are followed closely in order to ensure that adequate management controls are implemented, including corrective action plan reports.

Elsewhere specific topical risk assessment are conducted, for instance in terms of health & safety. We are also contemplating further steps to gain more insights in the performance of our labour providers.

3.2 Supply chain

Greenyard prioritises fresh produce and food products as part of its due diligence approach. In 2022, we actively engaged with the multi-stakeholder initiative SIFAV to identify the most important risks for the fruit and vegetables value chain and developed a Sustainability Risk Assessment tool. A similar tool was developed for the floricultural value chain by the multi-stakeholder initiative FSI. For each of the risk dimensions available data sources were assessed and integrated in a comprehensive database which will be updated once a year.

The risk dimensions, grouped by risk categories, are presented in the summary table below. These risk dimensions should be viewed as a first iteration, others can be added over time. In 2023 three new risk dimensions were added: discrimination, indigenous & community land rights and ozone-depleting substances.

Risk category	Risk dimension	Data source
Social	Child Labour	UNICEF US Department of Labour
	Discrimination	World Justice Project Rule of Law Index
	Forced & Bonded Labour	Global Slavery Index
	Freedom of Association	ITUC Global Rights Index
	Healthy & Safe Workplace	ILOSTAT
	Migrant Labour	ILOSTAT
	Working Poverty	ILOSTAT
	Women’s Rights & Gender Equality	UNDP Human Development Index
	Working Hours	ILOSTAT
Indigenous & Community Land Rights	Global Platform of Indigenous and Community Lands	
Environmental	Biodiversity	Resource Watch
	Climate Change Vulnerability	Germanwatch Global Climate Risk Index
	Deforestation	FAO Global Forest Resources Assessment
	Fertiliser use	Environmental Performance Index
	Food Loss & Waste	FAOSTAT
	GHG Emissions	Blonk Sustainability
	Overall Water Risk	WWF Water Risk Filter
	Ozone-Depleting Substances	UN Environment Programme
	Pesticide use	FAOSTAT
Soil Degradation	European Soil Data Centre	
Governance	Institutional Arrangements / Good Governance	World Bank Worldwide Governance Indicators

Based on the outcome of these data (inherent risk) and suppliers’ certification standards (risk management) the severity and likelihood of the risks for direct suppliers of fresh produce are captured in a risk heatmap which will form the basis for management recommendations ranging from no i) action needed, ii) investigate further or in worst case iii) suspend supplies until effective prevention and mitigation measures are implemented. Further prevention measures may be required for specific risk dimensions which are not sufficiently covered by regular certifications standards or management controls.

The above Sustainability Risk Assessment tool has been developed for the fresh produce sector and may not necessarily be suitable for all food products Greenyard procures. Therefore, we also have access to alternative supplier assessment tools (e.g. SEDEX) which allow to prioritise high risk suppliers.

4 Prevention & mitigation measures

This chapter describes Greenyard's measures to prevent and mitigate social and environmental risks and negative impacts in its operations and supply chain.

4.1 Own operations

Greenyard uses the outcome of the SEDEX Self-Assessment Questionnaires to evaluate the state of prevention measures in terms of its own operations. All sites are required to adopt at least standard industry practices across the various dimensions. Third party audits on social (all entities) and environmental (only processing entities) domains offer further assurance that the risks are adequately prevented and mitigated. Audits will gradually be rolled out across divisions and must be conducted at least every 3 years.

4.2 Supply chain

Greenyard views certification standards as a first line of defence to prevent social and environmental risks. Good Agricultural Practices certification is required from all growers, while social compliance certification is required from suppliers in high and medium social risk countries and sustainable water management certification is required from suppliers in high water risk regions. The certification requirements are included in Greenyard's Supplier Code of Conduct and Quality Agreements. Suppliers which do not yet have external assurance in place in terms of social compliance or sustainable water management, should pro-actively agree a roadmap with Greenyard. The requirements are aligned with the baskets of standards and lists of countries developed by the multi-stakeholder initiatives SIFAV and FSI.

For each risk dimension identified above preventive control options are available or being developed. In function of the risk level of suppliers further prevention measures may be envisaged in the form of self-assessment questionnaires, document reviews, farm visits, second party audits or third party audits.

Greenyard yearly conducts a number of third party audits to verify the effectiveness of its prevention measures. We recognise however the limitations of audits and certification standards and investigate the options to conduct Human right and environmental impact assessments (HREIA) in high risk origins or commodities.

4.3 Deal breakers

Greenyard has a clear baseline in its (Supplier) Code of Conduct to engage in business with suppliers and growers. We acknowledge that some suppliers may need support or time to be fully compliant with all demands laid down in these documents. In case of a non-compliance, Greenyard will work with its suppliers to help them comply with the Supplier Code of Conduct, recognizing that withdrawal of Greenyard's business may cause hardship and loss of employment. Greenyard will apply the key principle of "Protect, Respect and Remedy" in line with the United Nations Guiding Principles on Business and Human Rights.

Three situations are however deal breakers when they occur: child labour / adolescent workers, forced labour and unsafe buildings. In such cases Greenyard will take immediate action and together with the supplier establish an action plan to mitigate the dealbreaker. We focus on improving the situation assuming our suppliers will actively cooperate. In case of lack of cooperation and if the situation remains unchanged, we will suspend the relation. Only as a last resort will Greenyard terminate a relation with its supplier.

5 Tracking implementation and results

Due diligence is a circular process in which observations from audits, ratings, media reports and our grievance mechanisms feed improvements to our policies and management systems. With a view to monitor the effectiveness of our Due diligence approach we participate in ESG benchmarking initiatives (e.g. EcoVadis) and conduct third party audits both in our operations and with supply chain partners. Identified improvement areas are prioritised and where necessary corrective actions are implemented.

Greenyard uses supplier approval platforms (e.g. Agriplace, SEDEX, Qadex) to track the implementation of its certification requirements and its Due diligence approach. The following monitoring KPIs are tracked and will as from 2025 be reported in our Annual Report:

- Own operations: own workforce datapoints, #sites which completed self-assessment questionnaire, # sites which conducted a social and environmental audit, #grievances notified
- Supply chain: share certified volumes - social compliance, # third party audits, #grievances notified

Further performance indicators will be established in line with the general development of our Due diligence approach.

6 Communication & reporting

Greenyard aims to communicate transparently on the successes and challenges of its Due diligence approach. We regularly communicate about improvement initiatives on our website and social media as well as our Annual Report. As from 2025 the Annual Report will include a dedicated Due Diligence Statement in line with EU Corporate Sustainability Reporting Directive.

7 Grievance mechanism

This chapter describes Greenyard's mechanisms to voice grievances both for employees and external stakeholders and find the right solution to remedy these.

7.1 Greenyard Whistleblower Tool

The Greenyard's Whistleblower Tool allows both our employees and external parties like suppliers, customers, business partners and stakeholders to report any illegal, dishonest or wrongful conduct in their business relation with the Greenyard organization of which they have become aware, or for which they have reasonable grounds to believe it has occurred.

The Whistleblower Tool is easily accessible online and available in the languages where Greenyard operates. It is communicated on the Greenyard website, posters in our offices and operations as well as our Code of Conduct e-learning. Through ongoing campaigns, targeted at both white and blue-collar workers, we encourage all colleagues to speak up and share their concerns whenever they witness any kind of wrongdoing.

Greenyard wants to create a safe environment where a whistleblower feels comfortable reporting any Misconduct within the organisation. To that end the following protective measures were put in place:

- the confidential treatment of the identity of the whistleblower;
- the possibility for the whistleblower to remain anonymous when submitting a report;
- the prohibition of any form of retaliation against the whistleblower and related parties.

Reports will be treated strictly confidential and securely by a dedicated investigation team. Should any misconduct be confirmed, whether fully or partially, Greenyard will act swiftly to implement corrective actions and impose necessary remediation measures, to maintain a strong ethical business culture.

7.2 Grievance mechanisms for the supply chain

Greenyard's Whistleblower Tool is accessible for external stakeholders, including suppliers and their employees. The Whistleblower Tool is available on the website of Greenyard. We recognise however that value chain workers may find it more difficult to find us and have access to the Tool.

For this reason, we expect suppliers to establish themselves easily accessible, trustworthy and fair grievance mechanisms to prevent, identify, limit and remediate harm to their employees. They should annually review the functionality of these mechanisms. This expectation is reflected in Greenyard's Supplier Code of Conduct. Suppliers shall be aware of any non-compliance, proactively take corrective action when necessary, and inform Greenyard accordingly.

Elsewhere Greenyard supports Appellando, a multi-stakeholder alliance for grievance mechanisms in supply chains with a specific focus on agricultural supply chains. Over time these mechanisms will complement our own grievance mechanism.

8 Future developments in terms of due diligence

Building a due diligence approach is a continuous process and we are constantly improving. As we further roll out our Due diligence approach throughout the Group, we will start developing an approach on indirect spend categories, whereby packaging and transport will be prioritised.

Elsewhere we will align our Due diligence approach with the EU CSDDD and subsequent national legislation which will be rolled out in the coming years.