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# **Group Environmental Sustainability Policy**

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# Policy

## Group Environment Sustainability

### Outline

The Compleat Food Group recognises its responsibility to positively contribute to the environment in which it operates by driving sustainable development and promoting environmental stewardship. We have committed to fully integrating the ambitions laid out in our ESG strategy into our business practices as well as meeting our legal and regulatory obligations.

### Governance

We have a robust system of governance in place. All Compleat employees are responsible for implementing and maintaining our environmental standards. However, ultimate responsibility for our ESG strategy lies at Executive and Group Board level and is overseen by our Chief Procurement Officer (CPO). Our Group Head of ESG chairs the Operational ESG Committee (OESGC), which is formed of direct reports to the Executive team and covers Finance, Logistics, HR, Technical, Operations, HSE, Procurement, Farm Assurance, and New Product Development.

Progress made against Environmental KPIs is reported on during the OESGC meetings and monitored through internal forums. The necessary personnel, information, and financial resources will be allocated to assist the company in meeting its environmental objectives which is to reduce its impact on the environment through a process of continual improvement programmes.

We will be transparent about our progress and publicly disclose against global frameworks including TCFD, CDP, and SASB. We continue to improve our data systems, so we can report with greater accuracy and better identify opportunities for impact.

### Scope

This policy covers all Compleat sites within our primary operations, laying out our commitment to minimising our effect on the environment and to tackling material issues including decarbonisation, food waste, water scarcity, plastic packaging, and deforestation. The Compleat Food Group and its subsidiaries will control and manage its activities to ensure risks to the environment are identified, and action taken to minimise or eliminate adverse effects as far as practicable. We continue to monitor the changing domestic and European regulatory landscape to ensure we uphold the highest level of compliance.

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## Decarbonisation

This Policy will guide us to reduce our environmental impact and transition our business to a low carbon future.

- Aligned to a 1.5°C rise in global temperature and verified by Science Based Targets (SBTi), we have committed to operating with Net Zero emissions across our value chain by 2040. We will do this by achieving a 50% reduction across Scope 1 and 2, and 3 by 2030, and being Net Zero (90% reduction + removals) across Scope 1 and 2 by 2035, and Scope 3 by 2040. These commitments are in line with and in support of our customer's decarbonisation ambitions.
- We will re-baseline our targets from financial year 2021 (FY2021) to financial year 2024 (FY2024) and will update our emission reduction plans to account for significant changes to the business, such as the recent acquisition of SK Chilled Foods, Zorba Delicacies, and Harvey & Brockless in 2024. Re-baselining for these will be completed in financial year 2024/25.
- In financial year 2024/2025, we have calculated our Forest, Land and Agriculture (FLAG) emissions according to the SBTi's FLAG Guidance for companies in land-intensive sectors.
- In line with the Courtauld 2030 Commitment, we have set targets for a 50% absolute reduction in GHG emissions by 2030. To do this we have set annual site-based targets to reduce our consumption of natural gas, F-Gas leaks, and food waste and have established a cross-functional Energy and Waste Forum across our sites to help deliver against them. These ESG KPIs are reported on monthly to the board and will be a means of measuring environmental performance to drive continuous improvement.
- We are actively reviewing our strategy for renewable power across our sites in line with our Net Zero commitment for a 50% reduction in scope 2 emissions by 2030. We will explore decarbonisation opportunities across our brand portfolio and UK sites to support us on our Net Zero journey.
- We will update our GHG inventory at least once per year.
- We will make improvements to energy efficiency through the use of technology, notably our partner's consumption platform to track and reduce energy consumption at a site level.

## Food Waste

We will reduce in process food waste and work with partners such as FareShare, Company Shop, and Too Good to Go to redistribute food waste to charities and community groups in need.

- As a signatory to the Courtauld 2030 Commitment, we have committed to a 50% per capita reduction in food waste by 2030. We will report annually on our progress in the Food Loss and Waste reports, as required by WRAP. We also encourage other food businesses to publicly report their food waste and sign up to the WRAP Target, Measure, Act programme.

## Waste

We are already operating with zero-waste to landfill and have been for many years, but we still have so much more to do. We manage waste in accordance with the EU Waste Framework Directive.

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- As a Group, we want to be a zero-waste business by 2040. This is a big challenge and means eliminating edible food waste and collaborating with others to reduce, recycle and reuse our waste and water resources.
- We are actively working to reduce our general waste and in-process food waste and identifying recycling opportunities available through greater segregation.

## Health and Nutrition


We want to create great-tasting food that people love to eat, but which also forms part of a nutritious, balanced and sustainable diet, we call it Food to Feel Good. This means offering our customers and their consumers healthier options across all the categories where we operate. To achieve this, we launched the Compleat Health Charter in 2023, which guides our product development with key principles around providing the best-quality healthy product options and supports consumers in helping them to live the healthy lifestyles they want. That's why we have committed to:

- Providing the best-quality healthy product options in every tier.
- Develop nutrition-dense alternatives to existing products.
- Develop affordable, healthier, and more sustainable as standard.
- Actively innovate to continuously improve our consumers' access to nutritional benefits and plant-based choices.
- Grow our plant-based offering and increasing our volume of fermented food products.
- Explore healthy innovations across a range of our brands, including vegetable-dense pastry with Eat More Plants.
- Our New Product Development (NPD) Team have been trained on nutrient profile scoring, and we've created a dedicated Health Working Group
- We have completed a Nutrient Profile Model for all our retail products. Sorting the results into 3 groups (Healthy <4/ Healthier 4-10/ and Indulgent treats >1) will allow us to track improvements and set KPIs to ensure we are helping the consumer make healthier more informed choices about the food they eat.
- We have created an NPD toolkit that is underpinned by WWF's best-practice Livewell Diet. This will act as a blueprint for healthy criteria in our new products.
- In collaboration with Campden BRI, we have created our own definition of Ultra Processed Foods (UPF) and have completed analysis on all our raw materials and finished products. Providing our NPD and technical teams with alternatives to help make informed choices.
- We have a commitment to fortify all Squeaky Bean products with Iron & Vitamin B12

## Biodiversity and Nature

We want to play our role in creating a regenerative food system and rebalancing the relationship between business and nature, with the aim of promoting and protecting biodiversity across all of our sites. Compleat Nature is a community group that was created in 2023 and leads this cause across Compleat. The group is allocated financial resources to assist in meeting these goals and aims to:

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- Create habitat and wildlife corridors to increase the biodiversity on group sites and support the role of pollinators.
  - Through volunteer work and sponsorship of local wildlife projects, actively support the recovery and protection of pollinators and wildlife.
  - SDG.15 Life on Land, recognises that the land mass is capable of sequestering 60% of global emissions, and can play a crucial role in mitigating climate change. Following SDG 15, we will conserve ecosystems capable of sequestering carbon and mitigating climate change.

## Water

As a signatory of the Courtauld 2030 Commitment, we follow WRAP's water security roadmap and are committed to protecting critical water resources.

- Following this, we have targeted that 50% of fresh food is sourced from areas with sustainable water management by 2030.
- In financial year 2025/2026, we will also be reviewing water stewardship for both our own operations and key suppliers. Once collated, we will be able to explore mitigation plans. We also plan to disclose our water progress via CDP in financial year 2025/2026.

## Packaging

In line with our Packaging Policy, Compleat is committed to supplying safe food in packaging that is suitable for the intended use. Beyond our legal compliance, we are also taking action to support nature and the climate and minimise our impacts from packaging.

We are signatories to WRAP's UK Plastic Packaging Pact, and as such have committed to the four key targets:

1. Eliminate problematic or unnecessary single-use packaging by 2025.
2. 100% of plastics packaging to be reusable, recyclable or compostable by 2025.
3. 30% average recycled content across all plastic packaging by 2025.
4. And 70% of plastics packaging effectively recycled or composted by 2025.

We want to be a leader in responsible food packaging so are committed to introducing new innovations and solutions to ensure our packaging will be more easily recyclable and we reduce our packaging consumption across the value chain every year. This includes:

- Working to remove plastic where possible, such as removing trays from our pork pie packaging.
- Incorporating more recycled content in line with changes to the Extended Producer Responsibility (EPR) regulations.
- Using materials that are more easily recyclable such as paper-based board that is FSC or PEFC-certified and the introduction of mono-material film.

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- Using Post-Consumer Recycled (PCR) material as much as possible for rigid plastics but allowing a mix of Post-Industrial Recycled (PIR) material depending on supply chain availability.
  - Increasing our packaging data collection in 2024/25 as we further our partnership with packaging compliance company Clarity Environmental.
  - Ensuring our packaging items all carry the on-pack recycling label (OPRL) which provides consumers with guidance on how to dispose of the packaging items responsibly.

## Deforestation Free

We want to play our role in creating responsibly sourced food systems that are free from deforestation. In alliance with calculating our SBTi FLAG emissions, The Compleat Food Group commits to no legal or illegal deforestation and conversion across its primary deforestation-linked commodities by December 2025, with a cut-off date of 2020. These commodities include Palm, Soy, Cattle, Timber, Cocoa, and Coffee.

The cut-off date is based on the Accountability Framework Initiative's (AFI) definition. It means that clearance of natural forest after 2020 renders the affected area, and the commodity produced there, to be non-compliant with our no-deforestation and no-conversion commitments. Deforestation, also defined by AFI is the 'loss of natural forest as a result of land conversion and degradation', while conversion is defined as the 'change of a natural ecosystem to another land use, or a profound change in the natural ecosystem's species composition, structure, or function'.

- **Palm:** We are a member of the Roundtable on Sustainable Palm Oil (RSPO). All palm currently used across Compleat is certified RSPO segregated or mass balanced as outlined in our Palm Policy. By December 2025, all palm-based and compound ingredients, including derivatives and processing aids, will need to be traceable to origin, 100% RSPO certified segregated, and free from exploitation with a cut-off date of 31st December 2020. As a signatory to RSPO, we publicly disclose on our progress annually in the ACOP report.
- **Soy:** We are members of the Roundtable for Responsible Soy (RTRS) and signatories to the UK Soy Manifesto (UKSM). With the recent acquisition of SK Chilled Foods and Zorba Delicacies, Compleat now purchase soy and ingredients that contain soy directly. Until the end of 2025, we will purchase regional Mass Balanced credits to cover our volume as a minimum, but we are actively working with our suppliers to ensure they meet our UK Soy Manifesto commitments to source soy that is legal, deforestation and conversion free (vDCF) by December 2025, with a cut-off date of 31st December 2020. By December 2025, we aim to ensure soy from a high-risk source will be contracted to be traceable to origin, have a physically segregated chain of custody up to the point of import into the UK that is certified to a DCF standard as benchmarked by the [European Feed Industry \(FEFAC\)](#), or be verified DCF by a third party. This applies to both UK and non-UK direct suppliers of soy embedded in animal feed and soy as a product or ingredient in both retailer own label and branded products, in line with the UKSM commitment. Evidence that soy is from a low-risk origin is sufficient to meet our policy. We report on our soy footprint for our customers annually via 3Keel; we are aiming to cover our entire Group footprint in our 2024 reporting in line with our

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recent RTRS annual report and our Soy Policy. Soy derivatives such as soy lecithin, methyl, and soyate are in scope.

- Cattle: By December 2025, all non-UK and EU beef used in retailer own label and branded products needs to be traceable to origin and come from verified deforestation and conversion free sources.
- Timber: All timber derived products including paper and board that we use in our packaging is FSC or PEFC-certified. Suppliers must be able to demonstrate that their products are traceable to origin and sourced from one of these independent sustainability certification standards by December 2025, and with a cut-off of 2020.
- Coffee: By December 2025, for all materials containing coffee used in retailer own label and branded products, we commit to sourcing traceable to origin and certified deforestation free coffee that also respects human rights. Preferred certification methods include Fairtrade and Rainforest Alliance.
- Cocoa: By December 2025, for all materials containing cocoa used in retailer own label and branded products, we commit to sourcing segregated, traceable to origin, and certified deforestation free cocoa that respects human rights in addressing ethical and environmental challenges in cocoa growing communities. Preferred certification methods include Fairtrade, Rainforest Alliance, and Cocoa Horizon.
- Evidence that commodities are from a low-risk origin is sufficient to meet our policy.
- Disclosure and Reporting: Suppliers of soy (as a direct ingredient or embedded in animal feed) must support the annual commodities disclosure and reporting process if requested. You'll need to disclose the volumes supplied and provide evidence to support any certified claims. Evidence of vDCF soy should be made available to Compleat on request.
- We remain aware of changing regulatory landscape and are working with our suppliers and customers to ensure we will be compliant to EU Deforestation Regulation (EUDR) and UK Forest Risk Commodities (UKFRC), and any other applicable legislation once enforced. Where in-scope, materials supplied to Compleat will need to be compliant to meet these regulations.
- Peat: Remove the use of peat from our supply chain and supply base by 2030 in line with the UK's target. We expect relevant suppliers to engage in trials looking at peat-free alternatives ahead of this ban.

## Procurement

Compleat's Responsible Sourcing Policy outlines our intention to reduce impact, mitigate risk and improve performance, while ensuring that good labour practices are adhered to across our supply base. Our Environmental Procurement commitments outlined below strengthens this direction by further integrating material environmental issues in supply chain management together with conventional procurement considerations. To embed ESG within the Procurement function, the Environmental Procurement commitments will sit within our supplier strategy:

- We will set ESG related performance targets in our Procurement manager's Personal Development Plan (PDP) which are reviewed annually.
- We will provide training to category buyers annually on key social and environmental issues to improve climate and ethical literacy across the department.

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- The Procurement function will develop Strategic Category Plans annually for our top suppliers in each buying category. These will outline agreed environmental KPIs that we will build into supplier contracts. The environmental KPIs will help to ensure the strategic alignment of our key supply base with our Net Zero and deforestation-free commitments.
- We will work towards reviewing key suppliers' performance annually against the agreed environmental KPIs and actively support in ensuring their direction is aligned with our overarching ESG commitments.
- We will also work towards taking prospective supplier's ESG commitments and performance into consideration to inform the Supplier Approval process and strategic decision making.
- Our deforestation-free sourcing and reporting commitments will also be outlined in and acknowledged by suppliers in our Technical Terms of Trade.

## Continued Improvements

- We will undertake narrative scenario planning and strategy formation, embedding physical risk analysis into our Group Risk Register and risk management process.
- We will provide appropriate information, communication and training to build internal and external understanding, concerning the Company's environmental impact.
- Encourage our suppliers and customers to use sustainable resources wherever possible.
- We will work with our suppliers and customers to minimise the impact of our transport operations on the environment and reduce its carbon footprint by investing in electric vehicles, or vehicles capable of running on Biofuels.
- This policy shall be reviewed periodically to ensure that it remains relevant and appropriate to the organisation.

Signed:



Name: Brian Byrne

Title: Chief Procurement Officer

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