



Doc ref: ESG002

Group Palm Oil Policy

Issued By:	Authorised By:	Date:	Issue No:
David Moore	Brian Byrne	20/03/2025	4

Policy

Group Palm Oil Policy

Scope

This policy applies to all palm oil, palm kernel oil, and its derivatives and factions used in retailer Branded, Own Label and Food Service Finished products and Ingredients supplied to The Compleat Food Group (Winterbotham Darby, Addo Food Group, Wrights Pies Shelton, SK Chilled Foods, and Harvey and Brockless). We have combined all previous versions from across the group into one Compleat Food Group policy.

Commitment

The Compleat Food Group commits to no-deforestation or conversion across its primary deforestation-linked commodities by December 2025, with a cut-off date of 2020. These commodities include all palm-based and compound ingredients, including derivatives and processing aids. The cut-off date of this commitment is based on the Accountability Framework Initiative definition. This 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.

Responsibility

At The Compleat Food Group (TCFG) our aim is to create great tasting food that people love to eat and is affordable, healthier, and more sustainable as standard. We call it 'Food to Feel Good'.

Part of making food that is better for people and the planet is ensuring the ingredients we use in our products are as sustainable as possible, while ensuring taste and quality are not compromised.

As standard, we avoid the use of palm oil in our products. Where palm oil is necessary due to its functionality, we ensure it is from a sustainable source that does not contribute to deforestation or conversion, as certified by the Roundtable on Sustainable Palm Oil (RSPO).

Certification

A number of the sites within the Group are now certified under the RSPO accreditation scheme to supply products containing sustainable palm oil. The sites were audited by recognised certification bodies and meet all the requirements of the RSPO Supply Chain Certification Standard, version February (2020) and RSPO Rules on Market Communications and Claims (revised in January 2019).

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The sites are certified by the RSPO to supply products using certified sustainable palm and kernel oil through one or more of the supply chain models as stated in the RSPO Supply Chain Certification Systems

The sites this applies to are:

- Riverside Bakery (Addo Food Group)
- Palethorpes Bakery (Addo Food Group)
- Poole Bakery (Addo Food Group)
- Tottle Bakery (Addo Food Group)
- Crewe Bakery (Wrights Pies Shelton)
- Southside and Riverside North (SK Chilled Foods)

Our Outsourced Division based in Redhill, and previously known as Winterbotham Darby, is a Supply Chain Associate Member of RSPO.

RSPO Group Membership Number:

The Compleat Food Group (Holdings) Limited: 4-1507-23-000-00

TCFG Member List and Number:

Addo Food Group: 4-1296-20-000-00

Winterbotham Darby: 9-0094-11-000-00

Wrights Pies Shelton: 4-0633-15-000-00

S K Chilled Foods Ltd: 9-0469-14-000-00

As part of our commitment to using responsibly sourced palm oil, any ingredients we use which contain palm oil, palm oil derivatives or palm oil used in processing aids must also come from suppliers who have been certified by the RSPO. Our suppliers must have full traceability systems and strict factory intake procedures in place that ensure only RSPO certified palm and kernel oil products are used in products supplied to The Compleat Food Group.

If a supplier is supplying a palm oil containing ingredient into one of our sites, certification must be supplied and kept up to date. Details of the ingredient and the RSPO status must also be defined within The Compleat Food Group raw material specification. If a source of the raw material is changing, the Group must be informed before this is approved and supplied into the sites.

We annually report our Palm Oil usage directly to RSPO and via 3rd party databases to our customers.

Factory Traceability

Suppliers must have in place full traceability systems and strict factory intake procedures that ensure the only RSPO certified palm & kernel oil products are used in the products supplied to the Group. These traceability systems must be audited on an annual basis by a recognised RSPO certification body.

Finally, suppliers must inform The Compleat Food Group if there are any issues within their supply chain that they believe could compromise the RSPO status of their product to enable appropriate action to be taken.

Deforestation and Conversion

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Currently, all palm used across The Compleat Food Group is certified fully segregated or mass balanced. In the unlikely event that we are unable to achieve this certification we will purchase RSPO credits. Due to our deforestation and conversion free (DCF) commitments, by December 2025, all palm-based and compound ingredients, including derivatives and processing aids, supplied to Compleat will need to be traceable to origin, 100% RSPO certified fully segregated, and free from exploitation with a cut-off date of December 2020. Where in scope, these commodities will also need to be compliant to meet EU Deforestation Regulation (EUDR) and UK Forest Risk Commodity (UKFRC) legislation.

Signed:



Name: Brian Byrne

Title: Chief Procurement Officer

Date: 22/01/2025

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