



The Compleat Food Group

UK Soy Manifesto Progress Report 2025

(reporting on progress made during 2024)

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1. Introduction

Soy Sourcing Commitments:

Increasing global demands for meat products and, as a consequence, for animal feed of which soy is a key component, is driving soy production. Soybeans are predominantly produced in North America, South America, Europe, and Asia and are linked to the loss of natural forest from deforestation and land conversion which can lead to detrimental impacts on important landscapes such as the Amazon Cerrado, and the Gran Chaco.

As a large purchaser of embedded soy and soy ingredients, it is important for Compleat to safeguard natural forests and the communities that are dependent on them. We do not, however, plan to move away from soy as this is not always possible and there are benefits to remaining engaged with the value chain, such as supporting farmers and using market influence to promote positive change. Therefore, our ultimate aim is to ensure that all soy entering our supply chains from any origin, either for branded or own-label products, and either embedded or as a direct ingredient, is verified deforestation and conversion free (vDCF).

We are active members of the UK Soy Manifesto (UKSM) and are grateful for their support to facilitate the sourcing changes we are committed to. However, in line with UKSM's latest statement ([UKSM - Progress Statement 2025](#)), we can acknowledge that “despite the efforts and progress made during the last four years we do not believe that it will be possible to achieve the vDCF Goal by the end of 2025”.

The scope of this report covers the progress we have made towards vDCF soy and focuses on own label products supplied to UK retail & foodservice and the results from the annual reporting we complete with 3Keel. The majority of the soy within our footprint is currently embedded in the raw materials we purchase, for example soy used in animal feed and therefore the animal products we buy. Due to recent acquisitions, Compleat also sources some volumes of soy as a direct ingredient for use in our products.

About The Compleat Food Group:

Formed in 2021, The Compleat Food Group is a new food group on a mission to create great quality, tasty and affordable food, that people love to eat.

At Compleat, we're home to exciting brands including Pork Farms, Wall's Pastry, Squeaky Bean, Unearthed, Vadasz, Wrights, Palace Culture, The Real Yorkshire Pudding Co and Harvey and Brockless. We're also a leading supplier of delicious own-label pastry, sweet bakery, party food, olives and antipasti, continental meats, dips and sauces and plant-based food to the UK's major retailers, as well as across foodservice.

Compleat comprises of seven legacy businesses – Winterbotham Darby, Addo Foods, Wrights Food Group, with more recent acquisitions including SK Chilled Foods and Zorba

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Delicacies (acquired February 2024), Harvey & Brockless (acquired Sept 2024), The Real Yorkshire Pudding Company (acquired March 2025)– as well as our newest acquisition, Fresh-Pak Chilled Foods, acquired July 2025.

We employ more than 6,000 people across 17 sites and have more than 90 supply partners. With an annual turnover in excess of £1 billion, our ambition is to become the UK’s number one chilled prepared food company by shaping the future of food for the better. We’re owned by European private equity firm PAI Partners.

Public Commitments:

Compleat’s Soy Sourcing Policy is publicly available and is published on our website: [Our Policies - Compleat Food Group](#)

Further information on our sustainability work and our ESG Report can also be found on our website as part of our “Food to Feel Good ESG Impact Strategy” here: [Our Impact - Compleat Food Group](#).

2. 3Keel 2024 Report Highlights

- This is our third UK Soy Manifesto Progress Report, and it is fair to say that the landscape remains challenging, and progress is slow.
- In 2024, Compleat used a total of 10,925.37 tonnes of soy for our retail customers who require us to report to 3Keel. As per our recent RTRS members report, [Compleat Food - RTRS Report](#) this is not our entire soy footprint for the Group as it uses the 3Keel data collection process looking at our top 50 suppliers.
- Despite not being able to achieve vDCF by the end of 2025, Compleat continues to work with our customers and suppliers to support the sourcing of sustainable soy, and in line with the UKSM and our customers ambitions, is committed to ensuring all soy entering our supply chains for either branded or own-label products is deforestation and conversion free.
- The soy used in animal feed was imported by Cargill, ADM, Bunge, Cereal Docks, Dreyfus, Cofco and others.
- The origin of the soy used in the animal feed was a mix of high and low-risk origins from North and South America (USA, Canada, and Brazil). Soy is a high protein component in animal feed, used in the production of pork, poultry, eggs, cattle, lamb, and dairy (milk & cheese).
- The origin of soy in direct ingredients such as soy beans and miso paste are from low-risk areas such as China and Canada, as well as soy sauce from a segregated chain of custody from Brazil.

3. Soy Footprint Calculation - 2024

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Compleat works with the sustainability advisors [3Keel](#) to collate and calculate our soy footprint. This is a complicated process and employs differing [RTRS - conversion factors](#) depending on country, scheme, and end use. However, the final figures are cross referenced to ensure complete accuracy and transparency. We are constantly working on improving our data quality to support our annual reporting and are in the process of rolling out a new ERP system across the Group which will improve this process.

For our 2024 soy footprint, Compleat worked directly with 3Keel to engage with 50 of our most material suppliers for embedded soy and soy as a direct ingredient, which involved them completing questionnaires. This year's reporting saw a greater level of supplier engagement during this process (83%), which improved the level of detail we had on our soy footprint.

2024 saw an increase in certification claims being made by suppliers particularly standard or regional credits (16%), low risk origin claims (3%), as well as some Mass Balance claims (3%) for the first time. Of the volumes reported during our 3Keel process, 2.45% were vDCF.

Of the suppliers who took part in our 3Keel reporting, in 2023 only 20% said they were developing a vDCF policy. In 2024, this rose to 50% developing a policy and a further 23% stating they had already adopted a vDCF policy. In 2024, 83% said they were engaging with their supply chain to meet these asks. This is up from 65% in 2023.

4. Purchase of RTRS Regional Soy Credits

In early 2025, Compleat purchased 11,000 RTRS soy incentives (RTRS credits) via our impact facilitator partner and fellow RTRS member, Achieve Now, for Compleat's 2024 soy footprint. These incentives named RTRS Regional credits, were procured from farms in the MATOPIBA region, Brazil. One is located in the Piaui state and the other producer is located in the Maranhão state in Brazil. The credits Compleat purchased cover the 2024 soy footprint that wasn't vDCF and wasn't already covered by our suppliers' buying regional credits.

For example, through the 3Keel process we identified that suppliers such as Cranswick already purchase regional credits to cover any uncertified volumes (753). Fayrefield also purchased credits to cover their soy volume of 915 tonnes, but these were only standard credits. Compleat's minimum requirement is purchasing regional credits, therefore Compleat covered this volume, as well as all other uncertified claims with regional credits: As a result, the total number of credits Compleat purchased in 2025 was 11,000. This amount, along with the remaining credit balance from 2023 covered all uncertified volumes.

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By purchasing credits from specific critical regions in Brazil such as the ecological area of the MATOPIBA region, part of the Cerrado biome, Compleat will increase the demand in these regions for certified deforestation and conversion-free production. This could lead to a more certified supply of responsible soy which will help create a critical mass of deforestation and conversion free soy for physical uptake by the industry in the upcoming years.

We will continue to work closely with our impact facilitator and other partners to support the soy producers in the MATOPIBA region of Brazil. We believe that credits will continue to play an important role in transitioning to vDCF, not just on deforestation but broader topics such as land use, water use and biodiversity. As a member of RTRS, we continue to work closely to understand the longer-term role of credits and how Compleat can support farmers and smallholders.

5. Progress report towards sustainable soy

Compleat's Soy policy was relaunched in 2022 and revised again in 2025. We are currently reviewing our policy to be in line with the UKSM's latest statement and our customer's commitments. However, our ultimate goal remains the same: to achieve vDCF within our supply chain.

Once finalised, we will continue to share the amended policy with existing and new suppliers to clearly outline our commitment and asks: while we are in this transition period, the hierarchical preference that we will be encouraging suppliers to adopt is securing vDCF or low-risk origin soy in the first instance, then vDF or 'EUDR compliant' soy, and then certified Mass Balanced if the other three aren't available. Where Mass Balanced is not possible, suppliers would be expected to purchase Regional Credits to cover their soy volume as a minimum. Compleat would then look to purchase regional credits to cover any outstanding volumes that aren't vDCF or already covered by our suppliers' buying regional credits. vDCF will either need to be certified to a deforestation and conversion free (DCF) standard as benchmarked by the [European Feed Industry \(FEFAC\)](#), or be verified DCF by a third party.

At Compleat we have industry leading supply chain transparency using our bespoke supply chain management tool with our partner Authenticate IS ([Authenticate - Supply Chain Transparency](#)). We use our database to map our complex supply chains back to each individual farm or growers, deploy SAQ's, conduct audits and assessments, plus capture a myriad of data and KPI metrics. This tool is invaluable during this transition period.

6. The Impact of the EUDR & UK FRC Legislation

At Compleat we are acutely aware of the new European Union Deforestation Regulation (EUDR) regulations that comes into force in Europe at the end of 2025. This

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groundbreaking piece of legislation aims to tackle deforestation across various commodities including soy. The requirements to be able to trace all shipments of soy back to geo-locations and to show proof of land ownership are positive steps towards achieving sustainable soy. EUDR will improve the sustainability of soy coming into Europe, but it will not achieve all the aims of the UK Soy Manifesto, particularly the conversion element.

As the UK is no longer part of Europe, the UK Government is also working towards its own piece of Forest Risk Commodities legislation (FRC). EUDR does not directly apply to Compleat as we do not have a European entity, however UK FRC will apply. We eagerly await more clarity from the UK government over when FRC legislation will be finalised.

We continue to be active participants in the UK Soy Manifesto and are working closely with DEFRA, our customers, and suppliers to understand the implications of EUDR and UK FRC on Compleat and our supply chain.

7. Summary

Progress has been made in 2024 to deliver on our deforestation-free sourcing commitments. From the Group's formation in 2021, we have launched our "Food to Feel Good ESG Impact Strategy" and ESG Report and revised our Soy Sourcing policy to outline our deforestation-free commitments which we continue to share with existing and new suppliers.

2024 saw an increase in certification claims being made by key suppliers, particularly standard or regional credits, low risk origin claims, as well as some Mass Balance and vDCF claims for the first time.

We acknowledge that there is a lot more action needed within our supply chain and across global markets, but we look forward to working with our partners, customers, and NGOs to support the transition to sustainable soy production. We remain committed to our ultimate goal to achieve vDCF soy and will continue work with EFECA and 3Keel and engage with our supply chain and various industry group forums to drive progress in this space.

We would like to thank UK Soy Manifesto (EFECA), 3Keel, and our supply partners across our network for their continued help and support.

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