



The Compleat Food Group

UK Soy Manifesto Progress Report 2026

(reporting on progress made during 2025)

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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 remain committed to supporting the transition towards verified deforestation and conversion-free (vDCF) soy supply chains.

Following the end of the UK Soy Manifesto's original 2025 target period, Compleat has reviewed its approach to sustainable soy sourcing. The time-bound element of our vDCF commitment has been removed, and we will instead look to source vDCF soy where it is commercially available and as soon as reasonably possible. We will continue to maintain an open dialogue with our supply base to understand the availability of soy certification within the market and work to progress our sourcing up the preferred soy sourcing hierarchy, as outlined by the Retail Soy Group (RSG), towards our ultimate goal of sourcing vDCF soy.

The scope of this report covers the progress we have made towards this goal and focuses on own-label products supplied to UK retail and foodservice, alongside the results from the annual reporting we complete with 3Keel. The majority of the soy within our footprint is embedded in the raw materials we purchase, for example through soy used in animal feed associated with the animal products we buy. Compleat also sources some volumes of soy directly as an ingredient for use in our products.

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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, Julianne Bruno 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.

The Compleat Food Group brings together a number of established food businesses, including Winterbotham Darby, Addo Foods and Wrights Food Group, alongside more recent acquisitions including SK Chilled Foods and Zorba Delicacies (acquired February 2024), Harvey & Brockless (acquired September 2024), The Real Yorkshire Pudding Company (acquired March 2025), Fresh-Pak Chilled Foods (acquired July 2025), The Real Soup Company (acquired January 2026) and Billington Foods (acquired 3 September 2026).

We employ more than 6,300 people across 20 sites and have more than 90 supply partners. With an annual turnover in excess of £1 billion, our ambition remains to shape 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 2025 Report Highlights

- This is our fourth UK Soy Manifesto Progress Report, and it is fair to say that the landscape remains challenging, and progress is slow.

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- Compleat's 2025 soy footprint reported through the 3Keel data collection process was 10,289.28 tonnes. Note: 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. In line with the UK Soy Manifesto and our customers' ambitions, we remain committed to ensuring that all soy entering our supply chains for either branded or own-label products is deforestation and conversion free. As part of this commitment, we are supporting the development of the BSI DCF publicly available standard through the UK Soy Manifesto and welcome the launch of the AIC's EUDR-aligned Sustainable Commodities Scheme, including AIC's commitment to introducing a conversion-free module to enable vDCF claims on UK-landed soy.
- 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 - 2025

Compleat works with sustainability advisors 3Keel to collate and calculate our soy footprint. This is a complex process that uses RTRS conversion factors based on the end use of soy.

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 2025 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 (72%), which improved the level of detail we had on our soy footprint.

2025 saw a continued increase in certification claims being made by suppliers, particularly through standard and regional credits (22%), low-risk origin claims (2%)

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and Mass Balance claims (9%). Of the volumes reported through our 3Keel process, 3% had a vDCF claim, with 2.5% supported by sufficient evidence.

Of the suppliers who took part in our 3Keel reporting in 2025, 23% said they were developing a DCF policy, while a further 27% stated they had already adopted a DCF policy. In addition, 50% reported having an action plan in place to support progress towards DCF soy.

Through our annual supplier engagement process we continue to engage with suppliers to understand their progress towards DCF sourcing, identify barriers to certification and encourage greater alignment with Compleat's sustainable soy commitments.

4. Purchase of RTRS Regional Soy Credits

In early 2025, Compleat purchased 15,400 RTRS soy incentives (RTRS credits) via our impact facilitator partner and fellow RTRS member, Achieve Now, for Compleat's 2025 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 2025 soy footprint that wasn't vDCF and wasn't already covered by our suppliers' buying regional 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 15,400. This amount, along with the remaining credit balance from 2024 covered all uncertified volumes.

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

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Compleat's Soy Policy was relaunched in 2022 and most recently revised in 2025. Our ultimate goal remains to achieve vDCF within our supply chain. However, the time-bound element of this commitment has been removed, and we will instead look to source vDCF soy where it is commercially available and as soon as reasonably possible.

Compleat will continue to share its Soy Policy with existing and new suppliers to clearly outline our commitments and expectations. We will maintain an open dialogue with our supply base to understand the availability of more sustainable soy and encourage suppliers to progress up the preferred soy sourcing hierarchy outlined by the RSG.

The hierarchy prioritises vDCF soy sourced through a fully segregated chain of custody. Where this is not available, the next preference is soy from low-risk origins, such as North America, China and the EU, followed by EUDR-aligned soy that is verified deforestation-free (vDF). Where these options are not available, soy sourced through the Soft Commodities Forum provides a mass-balanced approach, with participating importers able to verify that at least 98% of the soy they import into the UK is vDCF. Our ultimate goal remains to source vDCF soy where it is commercially 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 Ideagen Supply Chain (Formerly known as 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 actively preparing for the implementation of the European Union Deforestation Regulation, which is due to apply from the end of 2026. The regulation introduces new due diligence and traceability requirements for commodities associated with deforestation, including soy. We are working across our business and with our supply chain to understand the requirements, identify products

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within scope and establish the processes and information needed to support compliance. While EUDR represents an important step towards addressing deforestation within commodity supply chains, our approach to soy extends beyond regulatory compliance, with our ultimate goal remaining the sourcing of vDCF soy.

Alongside EUDR, we are also closely following the development of the UK Government's Forest Risk Commodities (FRC) legislation, which is intended to address illegal deforestation associated with forest-risk commodities, including soy, in UK supply chains. We will continue to monitor developments and prepare for the legislation as further details on its requirements and implementation become available.

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

7. Summary

Progress has been made in 2025 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.

2025 saw continued progress in certification claims being made by key suppliers, particularly through standard and regional credits, low-risk origin and Mass Balance claims. We also saw an increase in suppliers transitioning towards DCF sourcing, although a significant proportion of our soy footprint remains without an evidenced claim.

We recognise that further action is needed across our supply chain and the wider market to support the transition towards more sustainable soy. We will continue to work with our suppliers, customers, NGOs and industry partners, including Efeca and 3Keel, to improve transparency and encourage progress up the preferred soy sourcing hierarchy. Our ultimate goal remains to source vDCF soy where it is commercially available.

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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