



# Modern Slavery Statement 2023

**The following statement sets out the actions taken by Glanbia plc (“Glanbia” or the “Group”) to address modern slavery<sup>1</sup> and child labour risks across our business and supply chain for the financial year ended 30 December 2023.**

## Our Statement on Modern Slavery and Associated Policies

Glanbia is committed to upholding international human rights and to acting with integrity in all of its dealings, relationships, and supply chains. We have a zero-tolerance approach to modern slavery and child labour. We are deeply committed to respecting and safeguarding the people who work for us and those who are affected by our activities. In this statement, Glanbia reports on its actions to assess and address modern slavery and child labour related risks associated with its operations. This includes its employment practices and the steps taken in assessing and addressing modern slavery and child labour risks within our supply chain.

## Our Business

**Glanbia is a better nutrition company. Our purpose is to deliver better nutrition for every step of life’s journey.**

We are committed to finding better, healthier and more sustainable nutritional products that fit the lifestyles and needs of people around the world.

This includes world-leading sports nutrition and lifestyle brands and large-scale, expert capabilities in proprietary technologies across a range of nutritional ingredients.

Over the past decade our portfolio has evolved from base ingredients to higher-value ingredient solutions and branded products.

Glanbia plc is a public limited company incorporated and headquartered in the Republic of Ireland. Total Group employees, including Joint Venture operations, amounts to over 5,500 people, which includes 92 nationalities based across 30 countries. Our major production facilities are located in the US, the UK, Germany and China. We have two global growth platforms in Glanbia Performance Nutrition and Glanbia Nutritionals. We also have key strategic long term partnerships in our Joint Venture operations.

### Organisational Structure

Glanbia Performance Nutrition (GPN) is the number one global sports nutrition portfolio<sup>2</sup> with a growing position in US lifestyle nutrition. GPN’s mission is to inspire people

everywhere to achieve their performance and healthy lifestyle goals, and we achieve this through education, advocacy, quality and authenticity. Our portfolio comprises nine brands – Optimum Nutrition (ON), BSN, Isopure, Nutramino, SlimFast, think!, Amazing Grass, Body & Fit and LevUp. Our brands are sold in over 100 countries online and in mass retailers, speciality stores and pharmacies.

Glanbia Nutritionals (GN) is comprised of GN Nutritional Solutions (NS) and GN US Cheese. GN NS is a leading innovation and solutions partner to the global food and nutrition industry. Through its extensive portfolio of dairy and non-dairy ingredients and capabilities, GN NS delivers a broad range of innovative ingredient solutions that improve product functionality and nutritional profile.

GN’s US Cheese business together with its US joint venture cheese and dairy operations is a leading supplier and marketer of American-style cheddar cheese, used by leading retail brand owners and food service organisations.

Glanbia’s Joint Venture activities are focused at MWC-Southwest Holdings<sup>3</sup>, a US business with strong alignment to our Glanbia Nutritionals platform.

More information on our business can be found in our 2023 Annual Report and Financial Statements which can be accessed at [glanbia.com](https://www.glanbia.com).

1. Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

2. Euromonitor,

3 MWC-Southwest Holdings – are US producers of American-style cheddar cheese and whey ingredients with plant locations in New Mexico and Michigan.

# Our Supply Chain

**The Glanbia Procurement team’s mission statement is “Creating value for all stakeholders through responsible procurement”.**

Glanbia spends in excess of \$2bn annually sourcing goods and services from over 6,000 suppliers in 55 countries. Glanbia aims to responsibly source all products and services, while also securing the livelihoods of the communities that underpin it.

Our supply chain includes direct suppliers who are involved in the processing and distribution of raw materials. The most significant of these being milk supply within North America. Indirect suppliers provide us with a range of goods and services that are essential to the effective operation of our business.

Glanbia’s greatest risk exposure to modern slavery and child labour is through suppliers, and the primary sources of these risks come from procuring goods in higher-risk geographies and sectors. We recognise the potential risks of forced labour and child labour in our extended supply chain and the complexity and challenges in operationalising modern slavery compliance.

To ensure our procurement spend contributes to improving social, economic and environmental impacts on stakeholders, we continue to risk assess and seek a further understanding of spend. We have also established minimum ethical and environmental standards, to which we expect our suppliers to adhere. These standards are outlined in the Group’s Supplier Code of Conduct.

Glanbia’s Procurement teams are dedicated to partnering with key stakeholders to support the delivery of Group and business unit ESG strategies and commitments. This involves:

- Driving greater awareness across our procurement teams of responsible sourcing practices;
- Partnering with suppliers who can make a positive contribution towards Glanbia’s ESG commitment;
- Applying responsible sourcing criteria to our supplier selection decisions and incorporating responsible sourcing principles into our Global Procurement Policy;
- Requiring all suppliers to agree to comply with laws and regulations of the countries in which they operate;
- Requiring all suppliers to agree to comply with all human rights, labour, food safety, environment and health and safety regulations;
- Requiring suppliers, as requested, to engage with Glanbia’s selected partner EcoVadis for assessment (or equivalent assessment as deemed appropriate) in line with Glanbia’s Responsible Procurement Programme; and

- Requiring suppliers to comply with necessary corrective actions that arise as a result of this assessment.

## Our Approach

Glanbia purchases only from approved suppliers. Buying from the right suppliers is critical to ensuring Glanbia receives high quality goods and services at the right price and time while mitigating risk to the organisation. At Glanbia, we promote the highest standards of ethical business conduct and sustainable business practices wherever we operate. We encourage our suppliers to have the same level of commitment to these standards.

Our Group-wide Responsible Procurement Programme sets out our supplier selection criteria and integrates Environmental, Social and Governance (ESG) factors into our procurement processes, procedures and systems. We focus on ensuring and re-enforcing compliance with all applicable laws on modern slavery and child labour, requiring our suppliers to confirm acceptance and conformance with the relevant Glanbia policies.

Glanbia partners with EcoVadis – a global trusted provider of business sustainability ratings. Since 2022 we have risk-assessed our supply base using the IQ module to assess supplier risk based on the suppliers’ industry and countries of operations. The results of this risk assessment enable us to prioritise the suppliers that require a more in-depth assessment using the EcoVadis platform (referred to as scorecards).

The objective of the EcoVadis methodology is to measure the quality of a company’s ESG management system through its policies, actions and results focusing on environment, labour and human rights (including addressing the areas of child labour, forced labour and human trafficking), ethics and sustainable procurement. A company’s size, industry and geographical locations are also considered. All assessments are evidence based and validated by EcoVadis experts and scored accordingly. The platform helps us benchmark against our industry, reduce risk, drive performance and improve environmental and social outcomes by collaborating with our suppliers on ESG performance.

Our ambition is to hold EcoVadis scorecard for all ‘high’ and ‘medium-high’ risk suppliers that Glanbia has an ongoing trading relationship with. To date Glanbia have EcoVadis scorecards for over 54% of our total spend, with a further 6% being onboarded. The target set for 2023 was 50% of total spend. The detailed scorecards assess our supply chain and identify key areas to be improved, for further information, refer to page 28 of Glanbia’s Sustainability Report 2023. We will work with our suppliers to develop their sustainability profile in line with Glanbia and customer requirements.

We also engage with our suppliers through ongoing dialogue via our commercial supply chain teams and through dedicated farm relations teams. We value a strong working partnership with our dairy suppliers. For example, since 2012 we have worked with our Idaho milk suppliers (our key US milk supply base for our wholly owned business) on a journey of continuous improvement. The approach has seen GN require suppliers to be in full standing with the National Milk Producers Federation Farmers Assuring Responsible Management (FARM) programme.

FARM provides the evidence that US dairy farmers are operating to the highest standards, including a Workforce Development (WFD) programme.

The WFD programme focuses on the people who work on-farm, and aims to provide dairy owners and managers with tools to enhance safe and thriving work environments. This includes a suite of education materials such as best in class HR and safety manuals, HR templates and legal fact sheets. 100% of our Idaho supply base have implemented the FARM modules.

We are aware that even with due diligence processes in place, incidents of modern slavery and child labour can occur and so we extend our Speak Up service for anonymous reporting of concerns to other stakeholders within our supply chain (e.g., agency workers, communities, shareholders, former employees, job applicants, and any employees of agents, or customers, or distributors, or suppliers).







## Our People

**One of Glanbia's goals is to develop the talent, culture, and values of Glanbia, within an inclusive framework that protects and develops our people, respects the wider community and upholds international human rights.**

### Human Rights and Employment Standards

Our Human Rights Policy is grounded in the following human rights standards:

- United Nations Universal Declaration of Human Rights;
- United Nations Guiding Principles on Business and Human Rights; and
- International Labour Organisations Declaration on Fundamental Principles and Rights at Work.

Glanbia is committed to upholding international human rights and we have a zero-tolerance approach to modern slavery and child labour and other human rights infringements. We are deeply committed to respecting and safeguarding the people who work for us and those who are affected by our activities.

We are committed to fully investigating and remedying any adverse human rights impact identified and take any such allegations very seriously. Glanbia applies the following principles in order to promote a respectful and rewarding workplace, partnering with our supply chain, and supporting the communities where we operate.

Employees and other workers are:

- provided with a safe working environment;
- paid fairly and on-time for the work they do;
- provided with working hours that comply with national laws and industry standards;
- (have) the right to freedom of association and collective bargaining;
- not subjected to any form of involuntary servitude or duress, such as having to repay large loans or having their passport retained;
- not discriminated against because of their gender, civil status, family status, sexual orientation, religion, age, disability, race membership of a minority community/group or any other status protected by applicable law;
- not subjected to physical, verbal, sexual, racial, psychological, or any other forms of abuse, bullying or harassment;
- not under the legal minimum age of employment, with a zero-tolerance for the exploitation of children; and
- provided with fair procedure and absence of discrimination in any grievance, disciplinary or other investigation or resolution process.

Our Group Code of Conduct and Group Supplier Code of Conduct also clearly outline our standards and commitments in relation to human rights including explicitly prohibiting the use of forced and child labour within our operations or those of anyone connected with the Group.

# Governance

Board oversight, clear policies, robust systems, active stakeholder engagement and disclosure are all fundamental drivers of a strong governance programme.

To ensure clarity on the ethical standards we require from every employee and supplier, there are a number of key policies which set out the requirements within the Group and also with those who we seek to do business with, these policies are reviewed, updated and communicated on a regular basis.

- **Group Code of Conduct** - sets out what we stand for as a business and how we demonstrate the highest standards of integrity and ethical behaviour. It is guided by our purpose, vision and values. It provides clarity on how we are expected to behave to build the trust and respect of everyone who interacts with us. Our Code is underpinned by several global policies, standards and guidelines covering specific areas of our work.
- **Group Speak Up Policy** - provides guidance for individuals who wish to raise certain concerns or issues about Glanbia in confidence and sets out clearly that Glanbia values those who raise concerns in good faith and will not tolerate retaliation.
- **Group Human Rights Policy** - is aligned with the UN declaration on human rights and affirms our commitment to upholding internationally recognised human rights.
- **Group Supplier Code of Conduct** - outlines the minimum standards we expect from providers of goods and services to Glanbia. We keep this Code under ongoing review, to robustly protect the rights of workers within our supply chain. It is explicit in directing that child, forced or involuntary labour shall not be permitted.

Glanbia is a signatory of the UN Global Compact (UNGC), the world's largest corporate citizenship and sustainability initiative. As such, we are committed to promoting, in our business activities, the 10 fundamental principles of the UNGC which address human rights, environmental protection, anti-corruption and labour rights, more specifically the elimination of all forms of forced labour and abolition of child labour.

While our Human Resource and Procurement functions take a lead role on upholding human rights, the entire organisation is accountable and is expected to work together to achieve our goals and commitments. We continue to build the capacity of our people on modern

slavery, child labour and human rights generally. This includes working collaboratively with others, enhancing our training and communication programmes and reporting functionality.

## Grievance Mechanism and Remediation

We encourage our employees, other workers and external parties to 'Speak Up' and report any situation where they have a reasonable belief that there has been a breach or potential breach of our policies, our Code of Conduct or the law which could amount to wrongdoing, illegal practices and/or unethical behaviour. To support our policy commitments, we have grievance mechanisms in place as outlined within our Speak Up Policy, including a confidential speak up line 'Safe Call'. This facility is available to both employees and third parties to raise a concern in confidence, 24-hours a day by phone, or online. Our Speak Up Policy and related processes were reviewed to assess its compatibility with the EU Whistleblowing Directive. This policy was published on our website in 2023.

For employees, the Safe Call facility complements, rather than replaces reporting issues to line managers, senior local management, senior Group management or the Group Secretary. Grievances are investigated and, where necessary, anonymised to protect those raising the issue.

For suppliers and external parties we advertise our Safe Call procedures and contact details through the following externally available policies: Speak Up Policy, Code of Conduct and Human Rights Policy, available at [glanbia.com](https://www.glanbia.com). We also have contact details posted on noticeboards and information screens within our facilities.

All concerns raised in this manner are assessed, fully investigated and appropriate action taken. All whistleblowing incidents are reviewed by the Group Secretary and formally investigated as appropriate depending on the nature of the concern raised. We will not tolerate retaliation or retribution for reporting such concerns.

In 2023, there were no reports of modern slavery or child labour received through this service.

As Glanbia has not identified any forced or child labour in its business or supply chain, it has not had to take any measures to remediate any forced or child labour or to remediate any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced or child labour in our activities or supply chains.

# Assessment and Due Diligence

To ensure compliance with our policies, we take the following steps to assess and monitor potential risks in our own operations and supply chain:

- Mitigate against the risk of modern slavery and child labour by following the Global Procurement Policy requirements and review of EcoVadis supplier analysis.
- Independent audits of our operating sites through the Glanbia Risk Management Process.
- Facilitate, without fear of recrimination, our people in reporting any concerns in relation to modern slavery and child labor within the Group operations or supply chain and ensure appropriate oversight and actions are implemented for each incident raised.
- Deployment of appropriate training and communication to our employees to support them in executing their role to ensure Glanbia's commitment to human rights and modern slavery is upheld.

## Global Procurement Procedures

Following application of our Responsible Procurement Programme, where a supplier is identified as not having suitable controls in place to prevent modern slavery or child labour, we will assess whether we can work with them to address the improvement opportunities. If the supplier in question is unwilling to engage with us, or suitable controls cannot be put in place, we will discontinue our relationship with the supplier in question. It may also involve notifying relevant authorities of the issues involved.

## Glanbia Risk Management System (GRMS)

GRMS is an auditable framework for the identification and management of operational risks across the Group. Assessment and ranking levels are based on international risk management standards. Assessments are conducted by an independent third party to help drive a culture of continuous improvement across our sites.

## Review of Speak Up Procedures

The Board maintains a process for communicating critical concerns through the Audit Committee, which reviews the effectiveness of our systems of internal control and risk management, including oversight of all whistleblowing activities. Our culture is measured through several mechanisms including policy and compliance processes, internal audit activities and both formal and informal channels for employees to raise concerns as referenced in the preceding paragraphs. The Board is apprised of any material whistleblowing incidents and Glanbia's Board Chairman, as Workforce Engagement Director, reviews them on an ongoing basis throughout the year.

All incidents reported via our Safe Call facility are reviewed by the Group Secretary and formally investigated by the relevant functional heads depending on the nature of the concern raised. Group Internal Audit reviewed all incidents raised during 2023. This review was summarised by issue theme, and presented to the Audit Committee, which supported their assessment of the adequacy of the Group's whistleblowing arrangements.

## Communication and Training

Glanbia continues to develop its commitment to combat modern slavery and child labour. In 2023, we conducted dedicated training for our procurement colleagues around human rights associated with our supply chain, using EcoVadis training module.

On an annual basis we review our core Group policies for any required updates, including the Code of Conduct, Anti-bribery and Corruption Policy, Procurement Policy and Supplier Code of Conduct, these policies hold a prominent position and are easily accessible on our intranet site 'Our Glanbia'.

In 2023, we updated and recommunicated our Speak Up Policy and related Safe Call facility to our employees, updating our dedicated intranet page and providing communication materials for posting across our sites.

We also understand that raising awareness is key in addressing the risk of modern slavery and child labour. We recognise the need to continue building capacity among our employees to identify risks of modern slavery or child labour and the actions required to respond effectively.

With this in mind we are rolling out employee training on the Group Code of Conduct which will include our commitment on upholding human rights.

### Assessing Effectiveness and 2024 Commitments

Glanbia has in place a number of measures to prevent and reduce the risk that modern slavery or child labour is used in our activities and supply chains. In 2024, Glanbia intends to more formally assess its effectiveness and take further actions in support of preventing and reducing risks of modern slavery and child labour in its activities and supply chains.

This includes carrying out a gap assessment between Glanbia's current due diligence procedures and the principles outlined within the OECD Due Diligence Guidance for Responsible Business Conduct, with a view to identifying any potential process improvements and enhanced measuring controls.

While we address the area of forced and child labour within our Code of Conduct, Supplier Code of Conduct and Human Rights policy, we are committed to publishing a dedicated policy this year on these matters in alignment with the United Nations International Labour Organisation's Conventions relating to forced and child labour.

This policy will outline in more detail the standards we expect within our own operations and also within our supply chain, including addressing the required actions in the event a forced or child labour incident is observed and the expected remediation procedures to be implemented.





# Approval

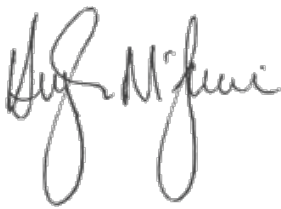
**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 in the UK, pursuant to Section 14 of the Australian Modern Slavery Act 2018 (Cth) in Australia and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023.**

**It constitutes the modern slavery statement of Glanbia plc's UK, Australian and Canadian legal entities in respect of the financial year ended 30 December 2023. Glanbia is aware that similar legislation is in place in various other jurisdictions where we operate. This statement is therefore to be read as applying to Glanbia entities across all of the locations we trade in.**

This statement was approved by the Board of Glanbia plc on 1 May 2024.

In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Glanbia plc



Hugh McGuire  
Chief Executive Officer  
Director of Glanbia plc  
1 May 2024

Glanbia Milk Limited

Glanbia Performance Nutrition (UK) Limited

Glanbia Performance Nutrition (UK Sales Division) Limited

Glanbia (UK) Limited

Glanbia Performance Nutrition Pty Ltd

Foodarom Group Inc

Glanbia Nutritionals (Canada) Inc

Glanbia Performance Nutrition Canada Inc





