

KERRY (CANADA) INC

Modern Slavery Act Report

The following statement sets out the actions taken by Kerry (Canada) Inc. (the "Company") to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the Company or of goods imported into Canada by the Company for the financial year ending 31st December 2024.

The Company is a wholly owned direct subsidiary of Kerry Group plc ("Kerry Group", the "Group", "our" or "we"). As a Group, we are firmly committed to upholding the rights of workers. Modern slavery and human trafficking are unacceptable practices that exploit some of the most vulnerable people and Kerry Group, including the Company, supports all efforts to eradicate these and other human rights abuses from international business and global supply chains.

At Kerry Group, we have established a global human rights approach that prioritises ethical trade, responsible sourcing and prevention of modern slavery and human trafficking throughout our organisation and in our supply chain.

In this statement, the Company reports on its actions, as a member of Kerry Group, to assess and address modern slavery risks associated with its operations, including its employment practices, and the protections provided for workers during the 2024 financial year. Furthermore, this statement also outlines how the Company is assessing and addressing modern slavery risks within its supply chain, including the efforts with supply partners to mitigate this risk.

Our Business and Organisational Structure

Kerry Group plc is a public limited company incorporated and headquartered in Ireland. Kerry Group is a global leader in the food and beverage industry, with a presence in over 54 countries and 124 manufacturing facilities across 34 countries.

Kerry Group's activities include the purchase of raw materials for production of products for the food, beverage and pharmaceutical markets. Kerry Group employs over 21,000 people and our operations encompass significant research, development and application expertise, customer and consumer insight and is enabled by a number of supporting functions including human resource, sales and marketing teams. The Company is a subsidiary of Kerry Group and is Kerry Group's main operating entity in Canada.

Kerry Group is a world leader in sustainable taste and nutrition solutions. Using our unique capabilities, we partner with customers to create

healthier, tastier, and more sustainable products enjoyed by over one billion people around the world.

At Kerry Group, our vision is to be our customers' most valued partner, creating a world of sustainable nutrition.

The Group is structured across two business segments as follows:

Taste & Nutrition

We use our broad range of ingredient solutions to innovate with our customers to create great tasting products, with improved nutrition and functionality, while ensuring a better impact for the planet.

Our consumer insights experts, R&D team of over 1,200 food scientists and extensive global footprint enable us to solve our customers' most complex challenges with differentiated solutions.

Our Taste & Nutrition business has three key market differentiators:

- **Sustainable Nutrition** - we are a leader in solutions that combine nutritional profile enhancements, improved taste, value for money and a minimised environmental impact
- **Emerging Markets** - we have a winning local model supported by a leading presence across emerging markets and a portfolio that drives positive impact
- **Foodservice** - we have deeply embedded innovation partnerships with customers, a longstanding and dedicated business model, and a broad and deep technology portfolio.

Dairy Ireland

The Kerry Dairy Ireland business consists of Dairy Consumer Products, with its leading range of brands across cheese, cheese snacks, dairy snacks and dairy spreads. It also comprises the Dairy Ingredients business, which is a leading provider of Irish dairy ingredients including functional dairy proteins, nutritional dairy bases and cheese systems, along with the provision of related agribusiness products and services.

Following the 70% sale of Kerry Dairy Ireland (which forms the Dairy Ireland segment) as described in Note

8 to the Group's Financial Statements, effective 2025 the Dairy Ireland business will no longer be a reportable segment of the Group.

Our Supply Chain

As a global organisation, Kerry Group sources raw materials from thousands of suppliers around the world and we have a direct contractual relationship with almost three thousand dairy farmers in South West Ireland. We source our natural raw materials from a vast global network of raw material suppliers across almost 80 countries. With a total raw materials and consumables of approximately €4.1 billion in 2024 we make a significant socio-economic contribution to the communities from which we source.

The Company's supply chain includes suppliers who are involved in primary production (predominantly agriculture), processing and distribution of raw materials and these entities recruit and employ workers associated with undertaking these activities. The Company also relies on a number of other indirect goods and services in its day to day operations, for example cleaning and security services.

Kerry Group acknowledges that the range of products and sourcing locations associated with our business (including the business of the Company) can present potential risks, including modern slavery and human trafficking. We conduct an annual risk assessment of our suppliers that helps identify and mitigate against those risks.

For more information on our business and supply chain, please see our latest [Annual Report](#).

Our Policies

At Kerry Group, we adopt a zero-tolerance approach towards the use of forced, bonded, indentured or involuntary labour in our own operations or in any activities connected with the Group. The Kerry Group Code of Conduct guides our business activities and sets out our commitment to creating a world of sustainable nutrition.

We have appropriate policies in place that underpin our commitment to identify and mitigate against human rights abuses in our own operations and in our supply chain. We continuously review and update all our policies, as required. These policies ensure clarity on the issue of labour standards and set out the requirements of those within the organisation and those who seek to do business with Kerry Group. These include the following:

- > The **Kerry Group Code of Conduct** sets out the high ethical standards which we demand from all colleagues in carrying out our day-to-day operations.
- > Our **Human Rights Policy** is informed by the UN Universal Declaration on Human Rights and affirms our commitment to upholding internationally recognised human rights.
- > Our **No Child or Forced Labour Policy** explicitly prohibits the use of child or forced labour within our operations or those of anyone connected with Kerry Group.
- > Our **Speak Up Policy** provides guidance for individuals who wish to raise certain concerns or issues about Kerry in confidence and sets out clearly that Kerry does not tolerate retaliation or retribution for voicing concerns.
- > In pursuit of our responsible sourcing goals, we have a detailed **Supplier Code of Conduct** within our **Supplier Requirements Manual** which outlines the minimum standards we expect from providers of goods and services to Kerry and the Company. We keep this Code under regular review, to protect the rights of workers within our supply chain and it is explicit in directing that forced or involuntary labour shall not be permitted. Where suppliers are found to have contravened the requirements set out in this Code, Kerry Group reserves the right to request suppliers to remedy any issues identified within a specified time frame. As a last resort, a responsible exit of the business relationship would occur should the Supplier fail to adequately engage or take the necessary steps to remedy issues.

While our Ethics and Compliance, Human Resource and Procurement functions take a lead role on upholding human rights, accountability is cross-functional, and all our teams and business units work

together to achieve our goals. We continue to build awareness among our people on modern slavery and human rights more generally and this includes working collaboratively with a range of stakeholders and seeking expert input for guidance on our approach.

Human Rights is overseen by our Social Sustainability Council, an executive level steering group which has senior-level representation from Human Resources, Integrated Operations, Procurement, Corporate Affairs, Legal, Internal Audit and Sustainability. These functions have day to day responsibility for delivering on the Group's human rights commitments across our operations and broader value chain.

Our Approach to Assessing and Managing Risk

Kerry Group's management of modern slavery risk across our operations and supply chain falls within the Group's broader approach to human rights which is informed by appropriate internal engagement and governance forums across all regions and locations.

As a Group, we have comprehensive structures in place to appropriately manage labour issues. In addition to our day-to-day people practices, we use a combination of internal assessments and independent audits across our facilities to identify areas of potential risk.

The Group's policies are communicated and available to all employees, ensuring that all colleagues are informed and understand our requirements. The Group also makes employees aware of the means by which they can report concerns, including through the Group's confidential reporting system, Speak Up.

While we are confident that these efforts are sufficient to mitigate the potential risk of forced labour within our operations, both the Group and the Company remain vigilant and continue to look at ways to strengthen our approach.

We understand that the potential risk of forced labour is much greater within our agricultural supply chain. The agricultural sector is considered high risk for forms of labour exploitation, including modern slavery. As part of the Group's efforts on responsible sourcing, we assess the key risks associated with the goods we buy, including risks relating to human rights. This risk identification process is designed to identify, among other things, sourcing regions where there is a heightened risk of human trafficking and/or modern slavery.

In 2024, we expanded our risk assessment to include a new dimension. Commodity risk was assessed to identify additional raw materials sourced from countries with an elevated risk of potential human

rights infringements. The associated suppliers were added to our scope of suppliers considered to be high risk.

The Group identifies human rights risks by combining internal knowledge with a range of external data, independent tools and benchmarks and risk assessments. Through this risk mapping process, we have a better understanding of the risks associated with both the production sites of our raw materials and the agricultural origin of commodities, where these are different. However, where there are a number of tiers between the supply site and the agricultural source of the raw material, it is more difficult to achieve visibility of labour practices at each stage of the chain.

To strengthen these ongoing efforts, we undertook a formal structured process with a third-party in developing an improved understanding of our salient human rights risks and impacts across our entire value chain, to include internal operations, third-party manufacturers, and supply chain. This exercise was completed from the perspective of rightsholders in line with UN Guiding Principles on Business and Human Rights (UNGPs). Led by the Social Sustainability Council, the outputs of this work have been incorporated into an integrated roadmap and implementation will be progressed through 2025.

Due Diligence

Our contract terms and conditions require Kerry's suppliers to comply with all applicable laws, which include laws prohibiting slavery and human trafficking. We have an approval process in place for new suppliers who are subject to Kerry's Supplier Requirements Manual, which includes Kerry's Supplier Code of Conduct.

Kerry's Supplier Code of Conduct is informed by a number of international standards and guidance documents including the UN Guiding Principles on Business and Human Rights, the ILO's Declaration on Fundamental Principles and Rights at Work, among other guidance documents and clearly sets out what is required of our suppliers to ensure they meet the standards we deem acceptable.

It is the responsibility of each supplier to achieve compliance with these requirements. We request suppliers to exercise due diligence in implementing requirements consistent with Kerry's Human Rights Policy within their own operations and upstream value chain.

While compliance is the minimum requirement, we encourage our suppliers to go beyond these requirements and to cooperate with Kerry Group in seeking to improve their business practices.

As a member of Sedex (Supplier ethical data exchange), we use this platform to help us assess supplier ethical performance. Suppliers that are located in countries deemed high-risk are expected to become Sedex members, initiate and maintain an active link with Kerry, complete SAQs, and undergo SMETA audits. In 2024, 88% of our spend with suppliers in high-risk countries were linked with Kerry on Sedex and 72% of our spend with suppliers linked to us on Sedex in high-risk countries have undergone a Sedex Members Ethical Trade Audit (SMETA) in the past three years. We continue to engage with the remaining suppliers in high-risk countries requesting their registration with Sedex and completion of a SMETA audit, along with any new suppliers in these high-risk countries.

Our Procurement teams, in collaboration with Sedex, directly engage with high-risk suppliers through facilitated workshops that help suppliers to understand and meet our expectations. To enhance awareness of human rights standards and build compliance capacity among our supply chain partners in 2024, we conducted training for suppliers in India and China. This enabled us to showcase the importance of Sedex and SMETA audit engagement for suppliers' operations and human rights practices.

In addition to our Sedex platform, our Global Supply Quality team have had active engagement with suppliers across all regions, conducting over 1,300 supplier food safety audits in 2024.

Grievance Mechanism, and Remediation

Kerry Group is committed to creating effective grievance mechanisms and addressing and remedying adverse human rights impacts.

Employees and other stakeholders have a number of ways of reporting concerns about Kerry Group, including the Company. Employees can report a concern locally by contacting their line manager, or a senior manager or a Human Resource Business Partner or the Ethics and Compliance Team.

Employees and other stakeholders can also contact the Speak Up service, which is operated by an independent provider. The Speak Up service can be accessed on Kerry.com in more than 26 languages and is available 24 hours a day, 7 days a week. Employees and other stakeholders can report a concern anonymously, and their report will be logged with a unique ID, which they can use to check on the status of the concern raised without providing personal contact information.

All concerns raised in this manner will be assessed, fully investigated and appropriate action taken. All whistleblowing incidents are reviewed and formally investigated by the Ethics and Compliance Team with support from relevant functional heads depending on the nature of the concern raised. Our Ethics and Compliance Team is comprised of employees from the global Legal function and they are responsible for the overall management of the Speak Up program.

Through the SMETA audit process, incidents of supplier non-conformance were identified, which may serve as indicators of potential human rights issues. These non-conformances primarily related to occupational health and safety, economic inclusion and living standards, and working conditions. We engage directly and indirectly with suppliers to facilitate the implementation of corrective actions for identified non-conformances, ensuring that these corrective actions are sufficiently robust. We monitored and investigated all formally reported complaints received through our Speak Up channel, ensuring appropriate actions are taken. Aligned to the characteristics of severity outlined in the UNGP Reporting Framework in the form of scale, scope, or irremediable character, no severe human rights issues or incidents were reported in the upstream value chain in 2024 through either the SMETA audit process or Speak Up channel. Accordingly, the Company did not take any measures to remediate any such issues, including for loss of income to vulnerable persons.

Assessing Progress, Communication and Training

In 2024, Kerry Group continued to engage with our suppliers directly and through the SEDEX platform to ensure the effectiveness of our approach and build awareness of our requirements. In addition, our manufacturing sites are registered with the platform and many are covered by independent SMETA audits, with learnings from this process shared to improve overall Group performance.

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

Internally, Kerry Group continues to make its policies available to employees and other stakeholders via a number of internal and external channels, communicating on any relevant changes or updates. This includes communications on Kerry's intranet, e-learning management system and external website. Kerry's Code of Conduct, Supplier Code of Conduct, Human Rights Policy and Speak Up Policy are all available to suppliers and external stakeholders on our Kerry.com website. The Code of Conduct and Speak Up Policies are available in 26 languages and our Supplier Code of Conduct is available in five languages. We are focused on ensuring that everyone at Kerry understands these requirements and their universal application regardless of role, seniority or location.

Our dedicated training programme helps us to monitor this. All employees are required to undertake annual compliance training which includes Code of Conduct and Speak Up training. This dedicated training program which covers the key elements of our Code of Conduct and Speak Up Policy, which incorporates our commitment to upholding human rights. Kerry Group has a dedicated Compliance Training Steering Committee that monitors and oversees compliance training completion across all new joiners and existing employees.

In addition, we also have a broader employee development programme called 'Sustainability Essentials' and in 2024 we launched a senior leadership course called 'This is Sustainable Nutrition', both of which enables knowledge, capability and engagement in crucial areas, including modules on responsible sourcing and social sustainability.

To enhance awareness of human rights standards and build compliance capacity among our supply chain partners in 2024, we conducted targeted training for suppliers in India and China. This training focused on the importance of Sedex and SMETA audit engagement to enhance suppliers' operations and human rights practices.

Stakeholder Engagement

We continue our membership of a number of multi-stakeholder initiatives that are engaged in the protection and promotion of human rights and the elimination of forced labour, including the Roundtable on Sustainable Palm Oil (RSPO), Palm Oil Collaboration Group (POCG), Sustainable Agriculture Initiative (SAI), Sustainable Spice Initiative (SSI), Sustainable Vanilla Initiative (SVI) and the Consumer Goods Forum (CGF). Our membership of these and other organisations allow us to assess our progress against industry best practice and helps us to identify areas for further improvement, including policy development.

In addition, in 2024, we engaged with industry bodies to assess potential targeted initiatives to enhance our human rights due diligence process. Our Responsible Sourcing team joined the Tech Against Trafficking Summit to explore data-driven solutions for modern slavery. The team also participated in a Child Rights in Business (CRIB) working group which focused on understanding child labour risks and safeguarding children's rights in supply chains. As part of this process, we identified a Rapid Response Function to assist Kerry Group on remediation, should a serious incident be identified in our upstream value chain.

KERRY (CANADA) INC.
(the “Corporation”)

RESOLUTIONS OF THE BOARD OF DIRECTORS

RECITALS:

- A. The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Modern Slavery Act**”) requires, among other things, that businesses subject to the Modern Slavery Act prepare and file a report each year on, among other things, the steps that the business has taken during its previous financial year to prevent and reduce the risk that forced labor or child labor is used in its supply chain;
- B. The Company has prepared its report for the financial year ended December 31, 2024, in response to the requirements under the Modern Slavery Act (the “**Modern Slavery Report**”), a copy of which has been provided to the Board; and
- C. The Modern Slavery Act requires that the Modern Slavery Report be approved by the Board and that an attestation be provided by a member of the Board prior to its filing with the Minister of Public Safety and Emergency Preparedness (the “**Minister**”).

RESOLVED THAT:

- 1. The Modern Slavery Report, as presented to the Board, is hereby authorized and approved by the Company, subject to such further non-material changes thereto as may be approved by any director of the Company, such approval to be conclusively evidenced by the signing of the Modern Slavery Report by such director.
- 2. Any director or officer of the Company is hereby authorized, for and on behalf of the Company to sign the Modern Slavery Report and the attestation contained therein.
- 3. Any director or officer of the Company is hereby authorized to file the Modern Slavery Report with the Minister.
- 4. Any director or officer of the Company is hereby authorized and directed to submit to Public Safety Canada a completed questionnaire with respect to forced labor and child labor in the form provided by Public Safety Canada through its online portal, as such officer deems necessary or advisable, provided that the content of the responses to such questionnaire are consistent with the Modern Slavery Report to the extent applicable.
- 5. Any director or officer of the Company is hereby authorized and directed, for and on behalf of the Company, to take such actions and execute all such documents or other instruments as such director or officer deems necessary or advisable in order to complete the matters provided for herein, the execution and delivery of such

documents or other instruments and the doing of any such other act by such officer to be conclusive evidence of such determination.

6. These resolutions may be executed in counterparts and delivered by any electronic means, including facsimile, portable document format (PDF), or DocuSign, each of which when so executed and delivered shall be an original, but all such counterparts together shall constitute one and the same instrument and, notwithstanding the date of execution of any such counterpart, shall be deemed passed on May 30, 2025.

The foregoing resolutions are passed as evidenced by the signatures of all the directors of the Corporation pursuant to the provisions of the *Business Corporations Act (Ontario)*.



John Cahalane

Elizabeth Munnely