

Deforestation and Conversion Free Soy Policy

COMMITMENT: to ensure that by 2025 soy used in our products does not contribute to deforestation or the conversion of natural ecosystems¹ (with a cut-off date of 2020²).

SCOPE

This policy is applicable to all soy used in Bakkavor products including animal feed for meat, fish, dairy, and egg supply chains to our UK business. All suppliers providing these materials directly or as sub-ingredients must comply with the requirements detailed within the policy unless they can demonstrate avoidance of soy as a feed component.

REQUIREMENT

All soy must be verified as deforestation and conversion-free through evidence that it comes from an origin (e.g., country, region, farm) with low risk of deforestation or conversion, or by sourcing through appropriate third party, company, or regional schemes. Schemes accepted by Bakkavor are detailed in Appendix 1. This list will be reviewed and updated periodically to ensure all schemes continue to meet robust criteria for deforestation and conversion free soy.

Evidence of legality alone is not sufficient although this will be an important component of due diligence and compliance management.

Certification Credits are accepted as part of a transition plan to build the production of sustainable soy on the ground but must not be relied on exclusively and will not be accepted after 2025.

Wherever possible, Bakkavor will align our requirements with industry peers to maximise the benefit of harmonisation as an accelerator of mass market transformation.

IMPLEMENTATION AND GOVERNANCE

Bakkavor's Responsible Sourcing Group will provide the framework for implementation of this policy and for progress reporting. We will ensure that our requirements are understood within our business and communicated to our suppliers.

We expect suppliers to share our commitment to deforestation and conversion free soymeal and to be transparent regarding their implementation plans and timelines. To achieve sufficient scale of impact, Bakkavor direct suppliers should ask their own suppliers to match their commitment. Every company in Bakkavor soy supply chain is encouraged to participate in forums that support industry-led solutions such as those detailed in Appendix 2.

In recognition of the significant influence of upstream supply chain actors and in anticipation of forthcoming UK and EU Regulations on excluding deforestation from these markets, we expect organisations that trade soy globally and import soy to the UK to make credible commitments to supplying deforestation and conversion-free soy by 2025, and to provide evidence to verify deforestation and

¹ Bakkavor recognises the AFI (<https://accountability-framework.org/>) definitions of deforestation and conversion of natural ecosystems

² Cut-off date refers to the last date when soy from areas of deforestation and conversion is permitted into the supply chain – i.e., if the land was converted in 2019 it will be classed as compliant with the commitment

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DCF Soy Technical Policy 1.0	13 th December 2022	Fiona Wheatley	Ross Dennison

Technical

Suppliers must provide information and evidence to Bakkavor or contractors working on our behalf to enable us to annually report on progress towards our commitment.

This policy forms part of the Bakkavor Supplier Code of Conduct which requires suppliers to address their deforestation impact. Compliance with the Bakkavor Supplier Code of Conduct is a standard contractual term of all supply agreements that Bakkavor has in place. As part of those supply agreements Bakkavor reserves the right to terminate these contracts if a supplier fails to comply with the Bakkavor Supplier Conduct. We will seek to support suppliers to prevent this outcome.

Where relevant, Bakkavor will seek to give preference to suppliers actively supporting the implementation of this policy through our supply chain.

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Appendix 1: Recognised standards and schemes

Bakkavor recognises certification standards that are compliant with all essential [FEFAC soy sourcing guidelines](#) and include the 'desired' criteria 34 "no soy is produced in converted natural ecosystems (natural forest, native grasslands, wetlands, swamps, peatlands, savannas, steep slopes and riparian areas) after a specific cut-off date no later than 2020"

Details on FEFAC standards that meet the essential criteria can be found at the following link, please note not all standards at this link meet Bakkavor requirement for desired criteria 34: <https://www.standardsmap.org/en/identify?client=FEFAC>

As traceability and assurance standards develop Bakkavor will allow for alternative forms of evidence that provide equivalent assurance that soy is deforestation and conversion free (e.g., assured confirmation of origin and deforestation status).

Currently, supply of verified deforestation and conversion free soy is limited, therefore mass balance chain of custody models are accepted as we recognise their important role in supporting the transition to deforestation and conversion free supply chains. However, it is anticipated that incoming regulatory requirements to conduct due diligence on forest risk commodities will require supply to move towards exclusively deforestation and conversion free soy. This Policy will be updated to give guidance on Bakkavor sourcing preferences as the market evolves and other alternative, equivalent forms of evidence develop.

Appendix 2: Industry Soy Forums

a) The UK Soy Manifesto is a collective industry commitment to work together to ensure all physical shipments of soy to the UK are deforestation and conversion free (cut-off date of January 2020 at the latest), fully implemented immediately where possible and no later than 2025. Signatories commit to work together to achieve this goal and request that their suppliers adopt the same commitments and incorporate these requirements within commercial contractual requirements. All signatories commit to publicly disclosing on their progress annually <https://www.uksoymanifesto.uk/>

b) UK Roundtable on Sustainable Soy brings together significant players in the UK soy market, providing a pre-competitive space for companies and industry associations to work together to achieve a shared goal of a secure, resilient, sustainable supply of soy to the UK, with joint progress monitoring and reporting. The UK Government supports Roundtable signatories' commitment to soya that is legal and cultivated in a way that protects against conversion of forests and valuable native vegetation. <https://www.efeca.com/sustainable-soya-initiative/>

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