



## Modern Slavery Statement For Financial Year 2024/25

Kallo Foods Ltd, trading as Ecotone UK are part of the Ecotone group. This statement sets out the steps that Ecotone has taken, or will be taking, to identify, monitor and reduce human rights violations by implementing innovative risk assessment processes that mitigate risk, facilitate delivery of our human rights agenda, and support suppliers' long-term improvement.

### Introduction of Ecotone Group

Ecotone is the European leader of sustainable and organic food. As such we are strongly committed to trading ethically, to ensure good working conditions and environmental best practices in our own operations and supply chains. Today we are the world's highest ranking multinational food B-corp. We know that our purchases and supply chains are subject to major societal, social and environmental challenges. To address these challenges, we have endorsed several commitments and taken various actions as outlined in this statement.

In 2023 we focused on training key employees on human rights policies and procedures and implemented effective risk assessment and mitigations on human rights issues. In 2024 we rolled out training to the wider team and continued risk assessing and taking mitigation actions as necessary. This year we will provide training on signs of modern slavery in the work place and in our supply chains.

### Our Structure, Business and Supply Chains

At Ecotone we empower people to make better choices both for themselves and for our planet. We are very proud of our 4 UK pioneering brands including Clipper, Kallo, Mrs Crimbles and Alter Eco. We also have other purposeful brands within our portfolio including Bjorg, Allos, Abbot Kinney's, Bonneterre, Destination, Ecocesta, El Granero, Isola Bio, Little Lunch, Tartex and Zonnatura.

Our products are made in our own factories or by approved third party suppliers. Our main product sectors include hot drinks, rice cakes, breakfast cereals, cooking aids, chocolate and gluten free products. Our products are sold in the UK, Europe and exported globally.

### Governance Structure:

Ecotone's Executive Board are based in our offices in Lyon. Our other offices are located in Amsterdam in the Netherlands, Camberley in the UK, Bremen in Germany, Badia Polesine in Italy, Madrid in Spain, Destination in Cestas, Ecotone Belgique in Mechelen and Ecotone Food Inc in Delaware. Ecotone operate as a "family" of companies, with a joint strategy and set of key value, beliefs and shared objectives. The Executive Board is comprised of Ecotone's Chief Executive and Chief Finance Officers as well as Group HR Director, country General Managers and selected Functional Heads (Marketing and Operations). Together they form the European Leadership Team (ELT). The ELT drives the agenda of the business, including our human rights due diligence and meets monthly to discuss results and planning. We also have 8 production facilities where we manufacture some of our key products.



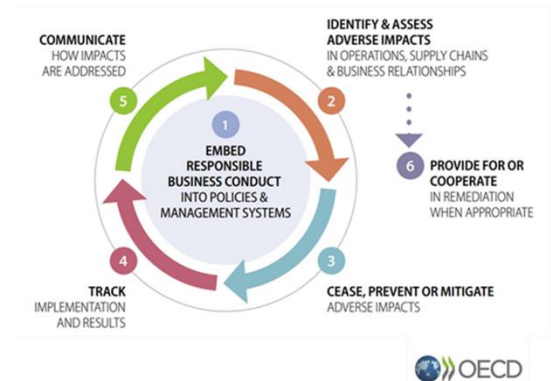
## 8 Production Facilities in Europe

	Facilities	Key Categories	Brands
1	Beaminst er	Teas	Clipper
2	Bordeaux	Hot Drinks	Destination, Naturela, Alter Eco
3	Badia Polesine	Plant-based beverages	Isola Bio, Bonneterre, Bjorg
4	Viadana	Plant-based beverages	
5	Seseña (Toledo)	Cereal, rice cakes	Ecocesta, El Granero
6	Paracuell os	Dietary supplements	
7	Drebber	Breakfast cereals, cereal bars	Allos, Bjorg, Zonnatura
8	Freiburg	Savoury and sweet spreads	Allos, Tartex, Zonnatura, Bjorg, Bonneterre

### Ecotone's Human Rights Due Diligence Process

Based on the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct as a framework for implementation, Ecotone develops and implements its own due diligence strategy and complies with relevant laws and regulations in each country where it operates. Human rights due diligence in its own operations and in its supply chain is conducted using the OECD Guidance (as per diagram) and summarized below:

1. Commitment: Policies and managements systems
2. Assessment: Identify and assess adverse impacts
3. Action: Cease, prevent, mitigate, track
4. Communication: Disclosure



### 1. Commitment: Policies and management systems.

Ecotone has a governance structure which provides accountability and responsibility for human rights. The overall accountability for Human Rights sits with the Executive Board and more specifically with the Chief Supply Chain Officer who ensures the Executive Board meets all Human Rights Requirements. Several members of the Ecotone Executive Board make up the Human Rights Steering Team and are responsible for final procedure approval and escalation decisions. The Human Rights Task Force are responsible for applying human rights due diligence also writing and updating procedures for approval by the Steering Team .



Ecotone has the following policies in place regarding Human Rights:

Internal: Human Rights Policy & Procedure, Human Rights Risk Assessment Procedure, Whistle-blower Policy, Code of Business Conduct.

External: Supplier Code of Conduct, Responsible Sourcing Policy, Product Quality Booklet-PQB.




Ecotone determined the following KPI's on Human Rights Due Diligence:

- Signature of the PQB (Product Quality Booklet) – including a chapter on corporate social responsibility for 100% of suppliers by 2026
- Annual training for staff in leading positions and/or engaged with suppliers on social and ethical topics in the supply chain (including forced labour and child labour)
- By 2026, 100% PTO of our FG and 100% PTO RM & Pack suppliers are registered and provide social and ethical information via the SEDEX Self-Assessment Questionnaire
- We are committed in a continuous effort to maintain and improve our participation in Fair Trade chains (chocolate, tea and coffee).

## 2. Assessment: Identify and assess adverse impacts

### 2.1 Identification of potential Human Rights Issues

In dialogue with internal stakeholders, external experts and based on risk mapping by external initiatives like Sedex and Fairtrade International, Ecotone has identified 9 important themes regarding human rights in our global business activities. The process involved understanding the characteristics of our own plants and our supply chain, particularly the agricultural products from which our products are made, while also leveraging information from a variety of external human rights-related reports.

Fundamental labour rights	No child labour 	Freedom from discrimination 	
	Freedom from slavery 	Gender Rights 	
Working conditions	Working hours are not excessive 	Payment of living wages or income 	Health, Safety and Hygiene 
	Provision of regular employment 	No bullying or harassment 	

### 2.2 Risk assessment of potential human rights issues

For the human rights issues identified, a risk assessment is made using Sedex Self Assessment Questionnaire (SAQ), risk assessment tools and SMETA information. These assessments include consideration of the geographic, economic, and social perspectives of the different regions that are prone to specific human rights risks. Based on this information, Ecotone implements prevention and mitigation actions for high risk raw materials, finished goods, packaging suppliers and/or supply chains.

- Sedex - Internal operations risk assessment.

In 2023, Ecotone implemented Sedex registration and self-assessment in all of our 8 factories in Europe in order to identify human rights risks and strengthen management at our own plants. We assessed the management capability towards potential risks in 13 categories and the overall management control score. Also the inherent, site specific and combined risk scores were determined for all sites.

6 sites have a medium combined risk score, 2 have a low combined risk score. Specific actions plans are developed and will be put in place in 2025 to get all sites at a low risk (green) combined risk score.

- Sedex - Supplier Risk Assessment

Since 2020 Ecotone has been engaging suppliers to share information through Sedex by answering to the SAQ. These SAQs evaluate the potential social risks in the supply chain by focusing on child labour, forced labour and other human rights issues, as well as considerations toward environment and occupational safety. In 2024 the number of suppliers on Sedex increased to 332 which covers a total Ecotone product turn over (2023) of 93.5%. Of these 332 suppliers, 37 were considered high risk using the risk assessment tool. These suppliers will be followed up in 2025.



- Sedex - Vulnerable Ingredients Risk Assessment

A raw material risk assessment was carried out in 2024 on Ecotone key raw materials. The SEDEX Pre-Screen Tool was used in conjunction with US ILAB list of Goods Produced by Forced or Child Labour so taking into account human rights risks for the raw materials, also country of origin and the type of industry.

The results of the risk assessment are given as 'high', 'medium' or 'low' risk rating for each raw material/country of origin assessed. 24 specific origins and 41 ingredients were considered high risk for Ecotone.

## 2.3 Identification and assessment of actual Human Rights issues

### Actual Internal grievances and whistleblowing.

Ecotone is committed to ensuring that all employees follow applicable laws and regulations including our own policies and guidelines. The internal SpeakUp-Whistleblowing policy was updated in October 2024 and applies to all employees (permanent or temporary) of Ecotone, In 2024 for the anonymous external channel offered by People Intouch, there was 1 issue recorded. This case was followed up and closed by our internal Confidential Advisor. Findings and results were reported to the CEO, Company Secretary and the Audit Committee.

### Actual External Issues

These issues are identified through supplier audits, Sedex SMETA audits, grievance mechanisms in the supply chain or through direct exposure in media-NGO articles/reports/documentaries. All identified issues are registered in an internal human rights tracker for assessment and follow-up.

Most actual findings are related to SMETA audits performed by third parties. For all linked suppliers a total of 610 non-compliances were identified in their last SMETA-audit, of these 1 was business critical and 82 were critical non-conformities. All non-conformities have to be corrected by the supplier and verified by the third party that performed the initial SMETA audit. Overdue business critical and critical findings from SMETA audits are followed up by the Ecotone CSR and Ethical controller.

Through different media channels, 17 issues were identified in 2024, all of these issues were assessed as a low risk, mostly because there was no link with Ecotone supply chains.

## 3. Action: Cease, prevent, mitigate, track

### 3.1 Preventive/mitigation actions potential Human Rights Issues

- Sedex- Own operations:

In 2023 Ecotone registered 100% of its sourcing units on Sedex. Based on the results of the SAQ and the risk assessment, In 2024 all individual supplier business units reviewed the self assessment questionnaire. This resulted in a 6% increase in the overall management control score and a 13.5% decrease in the average site risk score. Based on the results of the SAQ and the risk assessment Ecotone will implement an action plan in 2025 to increase the governance scores and mitigate site specific risks.

- Sedex – Supplier corrective actions

Ecotone requires new and existing suppliers to register on Sedex and fill the SAQ. If ranked high risk by the risk assessment, suppliers must close outstanding audit non conformances from their SMETA or Fairtrade audit. If the supplier does not have such audit, he needs to complete the Ecotone Human Rights Questionnaire. If any issues then the escalation process is followed.

The 25 high risk suppliers from the Dec 2023 risk assessment were followed up in 2024 and though supplier actions lowered the risk status for 24 of these suppliers. Ecotone had stopped trading with one supplier which came up as high risk in 2024.



Following the ethical risk assessment in 2024, 37 suppliers sites were identified as high risk. 12 were the same suppliers as previously identified in 2023 and they had taken actions already to reduce the risk, 19 supplier sites have taken actions to reduce the risk, whether by closing outstanding SMETA non conformances, completing Human Rights Questionnaire or completing the Sedex SAQ to 100%. 6 sites have been contacted to take actions to reduce the risk and these actions are in process, to be closed by end 2025.

- Sedex - Raw Material Corrective Actions

The Dec 2023 risk assessment identified 3 raw materials as high risk: coffee, cocoa and tea. In 2024 actions were put into place to follow-up on suppliers of these high risk materials:

Ecotone Category	Implemented actions
Chocolate	Sedex registration of all tier-1 suppliers Due Diligence in supply chain by supplier in place according to the EUDR
Coffee	Sedex registration green coffee traders and finished coffee suppliers Due Diligence in supply chain by traders and suppliers in place according to EUDR
Tea	Sedex registration for all producers Due Diligence by Ecotone through Fairtrade certification or Human Rights Questionnaire.

Suppliers of products containing 38 high risk ingredients, not including 3 above, were identified in the 2024 risk assessment. These are being followed up according to our Action Plan, based on volumes supplied. These 81 supplier's will be reviewed and they will be contacted to take mitigation actions as necessary, including but not limited to; providing ethical certifications, joining Sedex and completing the Self Assessment Questionnaire (SAQ) and or completing the Human Rights Questionnaire.

### 3.2 Mitigation/remediation actions actual Human Rights Issues

Actual Human Rights issues are registered in the Human Rights Tracker, risk assessed and are followed up according to the escalation and mitigation process flow. In 2024 there were no high risk issues and 2 medium risk issues. Relevant actions according to procedure were taken in response.

From 2024 Ecotone includes also overdue critical findings from SMETA audits in the human rights tracker, assessing them according to the severity of the findings category. From new SMETA audits in 2024 1 supplier was identified with overdue critical non-conformities. These non-conformities were assessed as a medium risk for Ecotone and followed-up by with the supplier to close out. The non conformances were actioned and confirmed by a re-audit later in 2024.

In the 2024 end of the year review a total of 610 audit findings were identified, of which 134 or 21% were overdue. Of these overdue findings 5 were critical. The involved suppliers were contacted and details added to the Human Rights Tracker. 4 suppliers have taken action to close the critical non conformities, 1 is in process due by end 2025.

## 4. Communication

The last step of Human Rights due diligence focuses on how to share information with partners and stakeholders about key issues, due diligence actions and effectiveness. To foster greater awareness among consumers and companies, we strive to be increasingly open about the complexities of human rights issues – and our means of addressing them, including this 2024/2025 Modern Slavery Statement.

In 2024 we delivered the following results on our commitments on Human Rights Due Diligence:

- Signature of the PQB (Product Quality Booklet) – including accepting the supplier code of conduct -for 100% suppliers by end 2026.  
**94% of finished good suppliers have signed the PQB end 2024.**  
**61% of raw material and pack suppliers have signed the PQB end 2024.**



- By 2024, staff in leading positions and/or engaged with suppliers trained annually on social and ethical topics in the supply chain (including forced labour and child labour)

**In 2023 Ecotone conducted a 2 part Human Rights training, this was repeated on 3 occasions to ensure any many could attend as possible. In 2024 the training was rolled out to all employees and is mandatory as part of onboarding. Ecotone are planning further training for all employees in 2025 on how to spot signs of slavery.**

- By 2026, 100% PTO of our FG and 100% PTO RM & Pack suppliers are registered and provide social and ethical information via the SEDEX Self-Assessment Questionnaire

**93% of PTO for finished good suppliers on Sedex end 2024.**

**94% of raw material and packaging suppliers on Sedex end 2024.**

- We are committed in a continuous effort to maintain and improve our participation in Fair Trade chains (chocolate, tea and coffee). **In 2024 44% of our TO on coffee, tea and cocoa were Fairtrade certified-**

In 2025, we will continue working to meet KPI's above and increasing the impact of our actions focusing on the following:

- Ongoing monitoring of grievances and whistleblowers in our own business
- Ongoing monitoring of supplier's management of forced and child labour issues via Sedex.
- Ongoing monitoring of key performance indicators to assess the effectiveness of our sustainability approach.

This statement was approved by the Board of Ecotone UK in and is signed by Bryan Martins, UK Ecotone's Chief Executive Officer who is on the Board.

April 2025