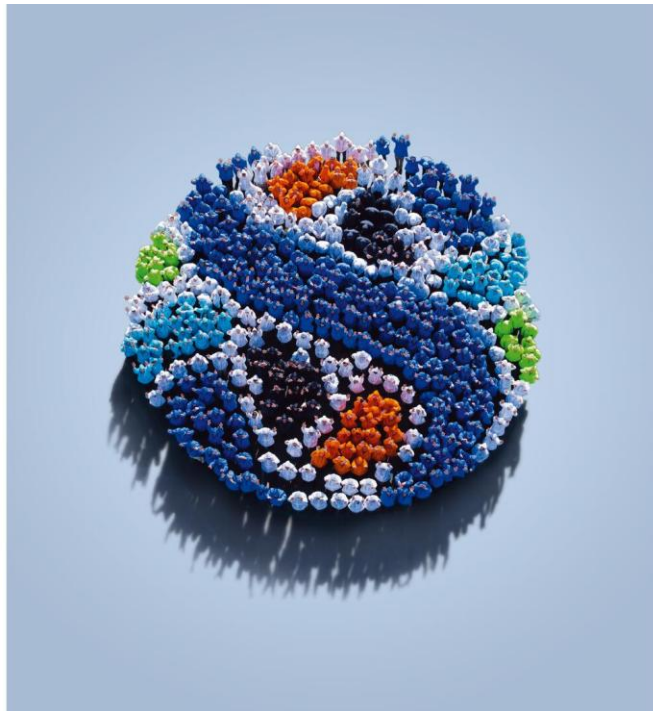


GROUPE SAVENCIA



VIGILANCE PLAN 2024

In accordance with French Law No. 2017-399 of March 27, 2017 relating to the Duty of vigilance of parent companies and contracting companies, the Vigilance Plan below presents the approach to vigilance and the report on the actions implemented within this framework at the level of the Group represented by SAVENCIA Holding (hereinafter referred to as "SAVENCIA Group," "SAVENCIA" or "the Group") for all its activities. It covers not only the activities of its subsidiary SAVENCIA Fromage & Dairy (as well as subsidiaries and sub-subsidiaries thereof), but also those of SAVENCIA Gourmet (as well as subsidiaries and sub-subsidiaries thereof).



**GROUPE
SAVENCIA**
Saveurs & Spécialités



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1. Introduction

SAVENCIA Group is an independent family-owned agri-food group made up of close-knit companies. The Group strives to reconcile its international agri-food business with a deep-rooted attachment to local regions, as well as the many stakeholders that contribute to value creation for sustainable and high-quality food.

Everywhere SAVENCIA Group operates, it takes care to conduct its business with respect for human rights and the environment, whether these activities are conducted directly or as part of its commercial relations.

SAVENCIA's values profoundly shape our way of working and our objectives: satisfied consumers, producers, suppliers and partners supported and encouraged to implement best practices, people working in a safe, ethical and sustainable environment. These values guide the Group's approach to protecting and promoting human rights, as well as its commitment to the environment. They also underpin the Group's ever-more concerted action for the common good: the way we rally teams around our shared values, everywhere and every day, is a perfect illustration of this pledge.

Reference framework

As part of our quest for constant improvement, consumer and customer satisfaction stands out as a keystone of our strategy, alongside the overall satisfaction of all those who work within and for the Group. We believe that respect for Human rights and the environment, food safety and the fight against corruption are exacting and unavoidable principles, not only compatible with striving for optimal economic performance, but also help to ensure the longevity thereof.

This goal is expressed in the Group's Code of Ethics: distributed to all employees and available on the Group's internal website, this Code guides the behavior and decisions of all employees with a view to working harmoniously, ethically and responsibly within SAVENCIA.

Legal context

The SAVENCIA Vigilance Plan meets the requirements of the French law on the Duty of Vigilance of parent and contracting companies.

This plan must include "reasonable vigilance measures to identify risks and prevent serious violations of human rights and fundamental freedoms, personal and environmental health and safety" that may result from the activities of the Group and its subsidiaries, as well as those of suppliers or subcontractors with which SAVENCIA has an established business relationship.

This obligation is based on five measures:

- ▣ risk-mapping;
- ▣ procedures for the regular assessment of the situation of subsidiaries, suppliers and subcontractors;
- ▣ appropriate actions to mitigate risks or prevent serious harm;
- ▣ a whistleblowing and report-processing system relating to the existence or materialization of risks;
- ▣ a system to monitor the measures implemented and assess the effectiveness thereof.

Initiatives to promote the Duty of Vigilance

Beyond compliance with the law, the Vigilance Plan represents an opportunity for the Group to formalize and coordinate initiatives already in place at its various sites, subsidiaries and business partners. The Group has long exhibited an awareness of its social and environmental responsibilities regarding its customers, employees and suppliers, as well as other relevant stakeholders. The Group considers that the requirements of the law on the Duty of Vigilance are fully integrated into its ethical and societal commitments and takes care to ensure compliance with these obligations in its operations and value chain.

Since 2003, SAVENCIA has been a signatory of the United Nations Global Compact, the world's largest sustainable development initiative, demonstrating its ambition to adopt an approach grounded in impact measurement and sustainable development across its entire value chain. In keeping with the UN's initiatives, the SAVENCIA Group's



principles of responsibility are based on international reference texts that define the commitments to be respected, particularly in terms of Human rights:

- ▣ the Universal Declaration of Human rights, the Sustainable Development Goals (SDGs) and the Principles of the United Nations Global Compact;
- ▣ the OECD Guidelines for Multinational Enterprises;
- ▣ the International Labor Organization (ILO) Tripartite Declaration on Multinational Enterprises;
- ▣ national legislation, particularly in terms of the Duty of Vigilance to respect Human rights and the environment.

As part of a growth strategy designed to reconcile meaning and performance, SAVENCIA Group has developed its approach to corporate social responsibility (CSR) based on the Oxygen Plan, a roadmap focused on collaboration and innovation for an ethical and sustainable world. The Oxygen plan incorporates the expectations of the Group's Stakeholders reflected in a material relevance analysis and strengthens the Group's CSR efforts in four major areas of progress with global ambition and local actions conducted by subsidiaries.

2. Governance and stakeholders

2.1 Governance

As part of SAVENCIA Group's commitment to respect human rights and the environment, Management has entrusted the Risk Management and Compliance Department with the responsibility of implementing the Group's vigilance approach.

Its responsibility includes coordinating the structure and content of the Vigilance Plan and issuing recommendations to the various departments involved. The Risk Management and Compliance Department regularly reports to Group Management regarding its progress. The Communication, CSR, Human Resources, Purchasing, Legal, Quality, Operations, Control and Internal Audit Departments have participated in monitoring actions and contributed to drafting the Vigilance Plan. The bodies responsible for issues relating to the Duty of Vigilance have their own internal steering mechanisms.

Progress in implementing the Vigilance Plan is monitored by the Group Ethics and Culture Committee, which incorporates issues relating to the Duty of Vigilance. The Committee is chaired by the Group Corporate Secretary and comprises the Group's Chairman, Chief Financial Officer, General Counsel, Human Resources Director and Compliance Director. twice a year in plenary session, and as often as required by current events. In 2024, it continued to review the progress of measures relating to the Duty of Vigilance and associated action plans.

The Audit and Risk Committee is one of the specialized Board committees dedicated to compliance and, especially, vigilance issues. Established in 2017, it meets at least four times a year and ensures implementation of the Vigilance Plan.

The CRS Committee, on which the Compliance Director sits, also addresses vigilance issues, consistent with its responsibility of overseeing CRS initiatives and the Oxygen Plan.

Finally, the Compliance Steering Committee is the body tasked with conducting and monitoring vigilance. It meets at least twice per year and as often as required by current events and its risk monitoring responsibilities.

2.2 Relations with stakeholders

Firm in the belief that a collaborative approach is instrumental in building and implementing its vigilance procedures, SAVENCIA Group strives to strengthen risk prevention by ensuring the involvement of all people, structures and organizations potentially affected by its activities.

As such, stakeholders are regularly consulted, both locally and nationally, regarding the implementation of action plans and priority measures aiming to prevent risks in the fields of human rights and the environment related to the Group's activities.



Our principal stakeholders are:

- ▣ Internally: our employees, their representatives, our executives and our shareholders.
- ▣ Externally: our producers, our consumers, our suppliers and our customers, along with our local communities, public entities, investors and NGOs.

Consultation with trade unions

Quality of life at work and labor relations are an absolute priority for the Group, which considers them a source of fulfillment and sustainable performance. Management/labor communications are thus ensured through employee representation at all levels of the Group:

- ▣ within the employee representative bodies of each subsidiary,
- ▣ through the Group Works Council for France, a representative body that meets twice a year,
- ▣ through joint committees in France, which manage systems put in place pursuant to agreements (personal risk insurance, healthcare expenses, collective pension savings plan, Group profit-sharing),
- ▣ and through the organization of a European Works Council, which meets once a year, governed by an operating agreement, in accordance with the provisions defined by Directive /2009/38/EC of the European Parliament and of the Council of May 6, 2009 and its transposition into French law by Order No. 2011-1328 of October 20, 2011, transposing the Directive.

Relations with stakeholders at the operational level

To prevent and effectively manage the impacts of its activities on human rights and the environment, SAVENCIA Group institutes and maintains dialogue with stakeholders at the operational level. These discussions are part of the Group's desire to build a lasting relationship with its ecosystem and include concrete actions as part of its commitment to global initiatives.

To help prepare the future of the dairy industry and to share its practices, SAVENCIA Fromage & Dairy works with all the players in the value chain in France: the National Federation of Dairy Industries (FNIL), the French Milk Processors' Association (ATLA), and the French National Association of Food Industries (ANIA).

SAVENCIA Fromage & Dairy sits on the Boards of Directors of the CNIEL (French Dairy Interprofessional Organization for cow's milk), ANICAP (National umbrella organization for the French goat milk industry), France Brebis Laitière (Interprofessional Organization for sheep milk – FBL), and associated regional bodies.

At the international level, SAVENCIA Fromage & Dairy is also a signatory of the Pathways to Dairy Net Zero Declaration and an active member of the International Dairy Federation (FIL-IDF), the Sustainable Agriculture Initiative (SAI) and the Dairy Sustainability Framework (DSF).

In particular, the plans undertaken by SAVENCIA Fromage & Dairy are in line with all the fundamental criteria and stipulations of the DSF: greenhouse gas emissions, soil nutrients, waste, water, soil quality and retention capacity, biodiversity, animal care practices, working conditions, market development, rural economies, product quality and safety, compliance with local legislation, human rights and the fight against deforestation.

SAVENCIA Fromage & Dairy has been a member of the Roundtable on Sustainable Palm Oil (RSPO) since 2021. It has also relied on the expertise of the international NGO Compassion In World Farming (CIWF) for its Animal Welfare Charter.

In addition, SAVENCIA Gourmet, with the companies Valrhona, Weiss and Révillon, is participating in the Cacao Forest project, which brings together partners from a variety of backgrounds to develop a more responsible and sustainable sector.



3. Scope and business model

3.1 Value chain

Active in 120 countries on all five continents and employing more than 25,000 people, the Group offers a portfolio of premium brands as well as a range of products and services for professionals in the F&B and industrial markets (agri-food, dietetics, health, etc.). Through its subsidiaries located throughout the world, it operates mainly in the fields of dairy and cheese (SAVENCIA Fromage & Dairy) as well as in the Charcuterie, Seafood and Chocolate sectors (SAVENCIA Gourmet).

SAVENCIA Fromage & Dairy is a major player in dairy processing and the world's fifth largest cheese group.

Its portfolio of unique brands, including Caprice des Dieux, St Môret, Tartare and Elle&Vire, brings together cheese specialties, butters and creams for the retail market, as well as creams, butters, cheeses and cheese sauces for the restaurant and bakery industries. Nutritional solutions and technical butters are specially developed for industrial applications.

SAVENCIA Gourmet is a leading international player in the field of premium desserts in the F&B sector and is present in supermarkets and hypermarkets in France with charcuterie and seafood brands. Brands include Valrhona, a top name in the Premium chocolate market serving professionals, as well as other brands such as Bordeaux Chesnel and Coraya.

3.2 Scope of application of the Duty of Vigilance

The vigilance measures set forth in this plan are implemented within the SAVENCIA Group value chain for:

- ▣ operations: all activities conducted by Group subsidiaries prior to the sale of products, essentially production or processing activities, as well as any upstream or downstream activities (e.g. transportation). Taking all brands together, the sites involved are mostly in France. Sites are also located in the United States, South America, Central Europe and Asia. The identified rights holders are the Group's employees but may also include the eco-system surrounding subsidiaries' business sites, particularly local residents.
- ▣ supply chains: the activity of all suppliers and subcontractors. Within the supply chain, these are people working for suppliers. Externally, these are the population groups and environmental areas potentially impacted by suppliers.
- ▣ sales and consumption: direct sales to consumers (B2C) as well as sales to professionals (B2B).

4. Risk analysis

Our activities and operations have an impact on our ecosystem. SAVENCIA Group, along with its subsidiaries, takes care to monitor these impacts and to remedy the negative effects generated. The Group has thus developed a risk assessment process that takes into account local specificities and emerging issues.

In line with the risk assessment methodology used at Group level, as well as that recommended by the French Anti-Corruption Agency with respect to compliance with the Sapin II Law, the Duty of Vigilance focuses specifically on the risks that SAVENCIA Group poses to its environment and ecosystem.

The work carried out at the end of 2022 with the support of an advisory firm made it possible to define the Group's Vigilance risk nomenclature and to analyze risks over a wider scope of activities, particularly taking local communities into account.



Risk categories

The first step consists of establishing a detailed definition of the risk categories covered by the Duty of Vigilance in the areas of human rights and the environment. To allow for a precise assessment of risk levels according to the nature of the risk and the potential impact on the SAVENCIA ecosystem, these two overarching categories are broken down into specific risk areas, taking into account the main categories of people whose rights may be impacted. The approach led to the following classification of risks:

Issues relating to the Duty of Vigilance			
Human rights and fundamental freedoms	Personal health and safety	Environment	Local communities
Associated risks			
Union rights	Worker health and safety	Contribution to climate change	Living and housing conditions and land grabbing
Discrimination and harassment	Consumer health and safety	Use of natural resources, harm to biodiversity and animal welfare	
Forced Labor		Water, air and soil pollution	
Child labor			
Compensation and working time			
Other working conditions (formal work relationship, employer-organized housing and commuting conditions)			

For human rights risks, the Group considers the human rights internationally recognized in the International Bill of Human Rights and the fundamental conventions of the International Labor Organization (ILO), in particular:

- ▣ fundamental rights and principles at work: freedom of association and the right to collective bargaining, elimination of forced or compulsory labor, abolition of child labor, elimination of discrimination in respect of employment and occupation (e.g. representation of women, equal pay), a safe and healthy working environment;
- ▣ other rights at work: organization of work, compensation and benefits, workplace well-being and quality of life (e.g. freedom from violence and psychological or sexual harassment, transformation of the work environment), respect for privacy, provision of essential infrastructure and services (e.g. catering, sanitary facilities, housing);
- ▣ rights of local communities: access to natural resources (e.g. water), acquisition, leasing and use of land (e.g. property rights and free, prior and informed consent), the health, safety and security of local communities.

Based on this risk classification, risk analysis procedures were carried out in late 2022 on 24 categories of Group purchases and activities in the following areas:



- ▣ direct purchases, including those for the Group's strategic agricultural raw materials - milk, cocoa, meat and fish,
- ▣ indirect purchases,
- ▣ technical purchases,
- ▣ product processing activities.

The scope covered is that of SAVENCIA and its subsidiaries, as well as its suppliers and subcontractors, in accordance with the requirements of the French Duty of vigilance law.

Risk analysis

To determine the most significant risks to which SAVENCIA is exposed, i.e. the most severe potential negative impacts that the Group's activities could cause to people and the environment, an analysis was conducted based on open-source literature (online publications, books, public indicators, etc.) and internal consultations with industry experts who provided their assessment of the level of exposure to the risks in question.

Regarding risks associated with the geographic scope of SAVENCIA operations, several recognized indexes are applied:

- ▣ Worldwide Governance Indicators (World Bank Index), which reflects risks in terms of human rights (rights of individuals, local communities and consumers);
- ▣ Environmental Performance Index (Yale and Columbia University), which reports environmental risk;
- ▣ Corruption Perceptions Index (Transparency International), which presents the risk of corruption as an aggravating factor for social and environmental issues.

Two criteria are used to assess the significance of the risks analyzed:

- ▣ severity, by determining the impacts that would be most significant in terms of intensity, scope and irreparability;
- ▣ likelihood, by assessing the probability of the risk materializing.

The result is a "gross" analysis of the risks inherent in the Group's activities.

Next, taking into account the prevention and mitigation actions implemented by the Group and its subsidiaries, the "net" level of risk is assessed according to four levels of risk control (weak, partial, acceptable, robust).

Risk mapping

Based on the results of this analysis, SAVENCIA Group mapped out the major risks, determining the level of priority according to the severity of the impact on human rights and the environment

Furthermore, as part of the implementation of the Corporate Sustainability Reporting Directive (CSRD), work was carried out in 2024 to perform a dual materiality analysis to identify the Group's CSR issues to be prioritized and the associated action plans (see Sustainability Report - General Information).

The methodology for identifying the risks of serious violations of human rights and fundamental freedoms, the health and safety of individuals and the environment followed in the context of Vigilance mapping differs from the methodology for identifying impacts, risks and opportunities (IROs) under the CSRD.

Work to further develop the Vigilance risk mapping and to align it with the IROs analysis will be carried out in 2025.

The following category risks have been identified as requiring particular vigilance and mainly concern our supply of agricultural materials.



Categories	Priority risks (Human rights in blue, Environment in green)
MILK	☐ Producer health and safety ☐ Compensation and working hours of producers ☐ Contribution to climate change ☐ Natural resources, biodiversity and animal well-being
COCOA	☐ Producer health and safety ☐ Compensation and working hours ☐ Child labor ☐ Forced Labor ☐ Local communities ☐ Contribution to climate change ☐ Natural resources, biodiversity
FISH	☐ Worker health and safety ☐ Natural resources, biodiversity and animal well-being
CHICKEN AND PORK	☐ Worker health and safety ☐ Compensation and working hours ☐ Natural resources, biodiversity and animal well-being
SOY/PALM	☐ Contribution to climate change ☐ Natural resources, biodiversity
NUTS	☐ Producer health and safety ☐ Child labor ☐ Natural resources, biodiversity
EGG PRODUCTS	☐ Natural resources, biodiversity and animal well-being
WATER	☐ Natural resources ☐ Pollution
ENERGY	☐ Contribution to climate change
PACKAGING	☐ Contribution to climate change ☐ Natural resources, biodiversity ☐ Pollution

This prioritization does not exclude monitoring other vigilance issues analyzed as being of lower risk, which are also covered by action plans incorporated into the Group's CSR approach, nor the inclusion of any new risks that may be identified as significant.

The results of the risk analysis communicated to the Group's subsidiaries in 2023 have raised awareness of the risks regarding the Duty of Vigilance among the relevant management committees and prompted them to take preventive and remedial action.

The priority measures intended to mitigate and prevent the potential damage caused by these risks are reviewed in consultation with the Group's stakeholders. All representative internal stakeholders, in particular the HR, CSR, Purchasing, Quality, Health and Safety and Environment teams, as well as employee representatives, members of the Group Works Council for France and the SAVENCIA European Works Council (EWC), were consulted in 2022 to provide input for this analysis.



5. Regular assessment based on risk analysis

In accordance with the provisions of the law on Duty of Vigilance, the compliance process is updated on the basis of internal qualitative and quantitative indicators.

The Compliance Steering Committee, which is responsible for managing the compliance approach alongside the network of Compliance Officers, thus meets at least twice a year, and more often as necessary, to monitor implementation of the vigilance mechanism.

▣ Qualitative monitoring

Qualitative monitoring is undertaken in collaboration with the network of Subsidiary Compliance Coordinators (SCC). These agents, whose position allows for full understanding of the Group's operational reality, report to the Compliance Department any type of violation or risk of violation of human rights observed in the course of their duties. They may also report any concerns or issues raised by employees.

This continual link between the network of Compliance Coordinators and the Compliance Department allows for concrete assessments of the effectiveness of the measures taken. The feedback from Coordinators thus serves as a basis for drawing up action plans and identifying areas for improvement.

▣ Quantitative monitoring

The various measures implemented internally are supplemented by monitoring indicators that make it possible to evaluate the effectiveness of the vigilance approach. SAVENCIA Group has at its disposal diverse tools and mechanisms to fulfill its Duty of Vigilance.

Employment reporting

The Group's social reporting data is analyzed in detail to assess the effectiveness of Group actions or policies, as well as to identify any changes to be made.

With respect to the Duty of Vigilance, the following, inter alia, are monitored:

- ▣ annual headcount (permanent and non-permanent), with details of hires and departures
- ▣ age breakdown in the workforce
- ▣ gender equality in the workplace
- ▣ employment and integration of people with disabilities
- ▣ working hours
- ▣ absenteeism
- ▣ training as well as wages and expenses
- ▣ labor relations.

Detailed information concerning these actions and the corresponding monitoring is given in Chapter 3.6 of the Vigilance plan on risk mitigation and prevention of serious harm.

Direct employee input and measurement of well-being

The development of the #MySAVENCIA Human Resources Information System made it possible to extend the practice of Annual Employee Appraisal Interviews (AEA) to all managers in 2022, and then gradually to all Group employees.

Furthermore, a concern for the well-being of its employees led the Group to put in place a tool intended to assess the workplace well-being of Group employees through periodic internal opinion surveys and implementation of improvement plans. An internal opinion survey was carried out in June 2022 among almost all SAVENCIA subsidiaries with more than 50 employees. The survey uses the Great Place To Work (GPTW) methodology together with the Trust Index questionnaire, which comprises 60 questions focused on five major factors of satisfaction: credibility, respect, fairness, pride and camaraderie.

More generally, the various communication channels available to employees provide a means of listening and expressing themselves, offering the possibility to report any difficulties, malfunctions or shortcomings: in



particular, employees have access to various mechanisms set up under an agreement with Stimulus, including an anonymous listening and support unit, and can report any problems via the Group's alert hotline (see Vigilance Plan - "Whistleblowing system and processing of reports").

Internal Audit

In performing its duties, the SAVENCIA Group Internal Audit Department is required to review the means and controls put in place within the subsidiaries covered by this Vigilance Plan.

The Internal Audit methodology is based on the internal control reference framework defined by the Committee of Sponsoring Organizations (COSO). The purpose of this internal control framework is to assess internal control based on 17 principles integrated into five components according to the 2013 model. These principles are assessed using a set of interview guides, co-constructed with the business line experts, and help to assess the risks associated with processes relating to the environment, social relations, ethics and responsible purchasing within the subsidiaries of the SAVENCIA Group. These assessments are:

- ▣ complementary to the audits carried out by the business lines (Quality, OHS, Insurance audits, etc.) and external audits
- ▣ cross-functional and therefore concern all subsidiary processes and activities
- ▣ take place periodically. Each subsidiary is audited every three to four years.

The audit plan may be also adapted according to the upstream risk assessment, including country risk assessments concerning respect for human rights and health, feedback from the Group Whistleblowing system, as well as any other relevant internal or external feedback. Feedback from audit visits is shared with the Group's Executive Management and the Compliance Department. When a point is raised, the Compliance Department highlights uncontrolled risks that need to be covered by action plans and in some cases, additional controls.

Group certification

The SAVENCIA Group has its Human Resources processes, practices and tools audited annually by an independent body, enabling it to be labeled "Top Employer". This label recognizes companies that apply best practices in the field of Human Resources. SAVENCIA is renowned for its policies and programs, particularly in terms of talent management, recruitment, onboarding, training and skills development. SAVENCIA Group has earned official Top Employer Europe status for 11 straight years.

In addition, 17 of the countries in which the Group operates have been awarded "Top Employer" certification. Argentina, Belgium, Brazil, China, the Czech Republic, France, Germany, India, Japan, Poland, Slovakia, the Republic of Korea, Spain, the United States and, for the first time, Serbia, Romania and the United Kingdom. This certification demonstrates SAVENCIA's commitment to a better working environment and highlights its responsible HR policies.

With the certification Arias, a Spanish company, the SAVENCIA Group has six of its subsidiaries certified as B Corporation® in 2024, along with Valrhona, Rogue Creamery, República del cacao, Norohy and Adamance.

Employee health and safety

In the area of health and safety, indicators (number and frequency of work-related accidents, etc.) make it possible to monitor changes in the number and type of incidents at Group sites to quickly plan new appropriate corrective measures (See Vigilance Plan - 3.6 "Risk mitigation and prevention of serious harm.")

Quality audit

Performance indicators are part of the third-party assessment process. They measure the effectiveness of the procedure in risk prevention in terms of human rights, health and safety, and the environment.

Regular checks and audits by certification bodies are also ways of measuring the effectiveness of the compliance system. These provide a way of measuring the effectiveness of the compliance system. Based on scores and results gathered, corrective action plans can be set up and implemented. (Cf. Vigilance plan - Risk mitigation and prevention of serious harm)



Suppliers

The Group is particularly vigilant regarding supply chain risks.

Such risks are considered high-priority. The Group's Responsible Purchasing approach includes assessing the positioning of suppliers regarding Vigilance risk mapping (see Vigilance Plan - Responsible Purchasing).

6. Risk mitigation and prevention of serious harm

This section presents the main measures taken by SAVENCIA to reduce the material risks generated by its activities and which could lead to serious violations of human rights and fundamental freedoms, danger to personal health and safety and severe environmental harm. It also provides information on the monitoring of corresponding results.

In addition, this section presents the vigilance measures regarding the activities of suppliers working with the Group and its subsidiaries in the context of an established commercial relationship.

The risks presented are not exhaustive and reflect a priority-based selection according to our detailed risk analysis.

Finally, a fundamental cross-cutting measure has been implemented throughout the Group with the roll-out of a mandatory e-learning course on the Duty of Vigilance. Launched in 2023 and translated into all Group languages, this program aims to raise employee awareness of the risks of serious harm in the areas of human rights, health and safety and respect for the environment due to the actions of the Group's subsidiaries, suppliers or subcontractors in France and throughout the world. This training course presents the issues addressed by the measures making up the Vigilance Plan, in particular the alert system concerning the actual or presumed existence of risks.

By 2024, 80% of the Group's employees with access to the computer platform will have received e-learning training in the Duty of Vigilance.

6.1. Group actions

This chapter presents the actions taken to prevent and remedy potential harm resulting from the activities of the Group and its suppliers. These actions are linked to the significant risks identified in the Vigilance mapping; others sometimes reflect a lower level of risk but are nonetheless extremely important for the Group.

For each risk identified, information is included on the measures taken and the monitoring of results.

This monitoring includes references to the corresponding chapters and indicators of the 2024 Sustainability Report.

6.1.1. *Human rights and fundamental freedoms*

As part of its Duty of Vigilance, SAVENCIA has identified the risks posed by its activity to the human rights of women and men.

Six risks were thus defined and analyzed according to the methodology previously presented in Chapter "Risk analysis" of the Vigilance Plan."

▣ Child labor

Risk of child labor (with the exception of the regulated framework of educational activities and apprenticeship)
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In accordance with the ILO Minimum Age Convention (No. 138) of 1973 and the ILO Worst Forms of Child Labor Convention (No. 182) of 1999, the Group prohibits the employment of minors under the age of 15. Beyond a principled refusal to engage in child labor, SAVENCIA is committed to respecting the rights of children everywhere, as enshrined in the International Convention on the Rights of the Child of 1989.



Actions implemented	Results
GROUP	
Subsidiary HR teams systematically monitor the age of job applicants. The commitments contained in the Group Responsible Purchasing Charter cover child labor.	In 2024, the minimum age of permanent Group employees was 16; people under the age of 18 are predominantly employed through work-study contracts. At year-end 2024, 83% of the Group's external expenditures overseen by the Purchasing function and carried out with major suppliers (over €1 million per year) were covered (excluding sourcing of agricultural raw materials). See Vigilance Plan - "Responsible purchasing."
COCOA	
Child labor is a major risk faced by the cocoa sector, with production taking place mainly in countries in the Southern Hemisphere. Specific actions have been taken in SAVENCIA's cocoa subsidiaries to respond to identified human rights risks, in particular the risk of increased child labor arising from changes in cocoa prices.	Valrhona is involved in programs that facilitate and improve access to education: around ten schools have been built and renovated in Ivory Coast, Ghana and Venezuela.
As part of its procurement policy, the Valrhona subsidiary has established multi-year agreements (three years or more) with all its partner producers, with an average contract duration of more than eight years. These contracts make it possible to reduce child labor by maintaining high prices. In 2017, Valrhona joined the NGO International Cocoa Initiative (ICI), which operates in Ghana and Côte d'Ivoire. This organization works to ensure a better future for children in cocoa-growing communities. ICI has tested and rolled out solutions for the development of Child Labor Monitoring and Remediation Systems (CLMRS). The priority is to address these solutions regarding our West African resources, which are the most at risk. One of the pillars of the Rev'Cacao program implemented by Group subsidiaries Révillon, La Maison du Chocolat and De Neuville is the fight against child labor on plantations. As access to quality education is key in this context, a "sustainable cocoa" premium paid to the producer goes toward paying children's school fees.	In 2023, Valrhona and its partners in Côte d'Ivoire and Ghana committed to setting up a child labor monitoring and remediation system in each country, based on the ICI (International Cocoa Initiative) method.



NUTS	
The nuts business requires complex supply chains, which involve numerous intermediaries in fragmented and often sensitive international sectors. There is little distinction between work and family life (e.g. cracking nuts at home) leading to the risk of child labor, particularly in certain Eastern European countries. Group subsidiaries sourcing nuts call upon their suppliers to sign the Responsible Purchasing Charter.	In 2024, all suppliers of the subsidiary Fruisec signed the Group's Responsible Purchasing Charter, committing the partners, among other things, to the prohibition of child labor.

▣ Forced Labor

Risk of resorting to permanent, temporary, or interim forced labor.

In accordance with ILO Forced Labor Convention (No. 29) of 1930 and the ILO Abolition of Forced Labor Convention (No. 105) of 1957, the Group prohibits the use of forced labor by ensuring that all work is voluntary and that employees are free to leave their jobs at any time.

Actions implemented	Results
GROUP	
The commitments contained in the Responsible Purchasing Charter cover forced labor. In each subsidiary, HR teams verify that employees are provided with a formal and reciprocal commitment.	At year-end 2024, 83% of the Group's external expenditures overseen by the Purchasing function and carried out with major suppliers (over €1 million per year) were covered (excluding sourcing of agricultural raw materials). See Vigilance Plan - "Responsible purchasing."
FISH	
Coraya sources wild Alaskan pollock and Pacific hake, from the North Pacific. The sustainable fishing framework, MSC, on which the sector's activities are based include criteria for suppliers and processors of certified seafood products to ensure that products are not the result of forced or child labor.	In 2024, 100% of the fish in the Coraya surimi product range came from sustainable fishing, monitored by an independent body.



■ Compensation and working hours

Risk of workers not being paid in accordance with ILO Conventions and local regulations.

In accordance with ILO Equal Remuneration Convention (No. 100) of 1951, the Group upholds worker rights, and its subsidiaries comply with applicable labor laws, in particular with regard to wages, which must be at least equal to the minimum wage in the country for equivalent work, with the objective of promoting a decent wage as envisaged by the ILO.

Actions implemented	Results
GROUP	
The SAVENCIA Group complies with all local and applicable laws and ensures through its human resources policy that individual and collective performance is recognized and compensated in keeping with the market standards of each country. In all subsidiaries, the Group complies with the rules on collective bargaining on wage increases (in particular the Obligatory Annual Negotiations in France). Group Social protection, health and welfare, and employee savings schemes protect employees and their families and to reward team performance.	See Sustainability Report - Social - Company Workforce.
MILK	
In the past three years SAVENCIA Fromage & Dairy has raised the 38/32 reference price of milk by 33%. Since 2018 the price of milk on average has been more than 1% over the France Agrimer Beyond the price of milk, the Group is implementing several support programs—including financial support—to encourage generational renewal and agricultural transition Specific financial and support measures have been developed as part of the Terroirs de lait 2032 strategy. Young farmers receive a start-up support package including financial aid, a long-term contractual commitment and technical assistance to help consolidate their project.	See Sustainability Report - Social - Value chain workers. In 2024, 352 young farmers received at least one form of start-up financial support, vs. 187 in 2023. See Sustainability Report - Social - Value chain workers and the Governance section - Managing supplier relations
COCOA	
Mindful of the complex and far-reaching social, economic and environmental challenges facing the cocoa industry, Valrhona is working in partnership with all the players in the French cocoa sector through the French Initiative for Sustainable Cocoa (IFCD), with a joint commitment to three concrete, time-bound objectives: ● Improve the income of cocoa farmers to ensure that they enjoy a “decent living” by 2030. ● Halt cocoa sourcing from deforested areas by 2025. ● Intensify the fight against child labor in French cocoa sourcing by 2025.	Since 2021, all cocoa purchases have come from long-term partnerships, thereby contributing to the achievement of our objectives. Efforts are being made to ensure that purchasing contracts with partner suppliers evolve towards international fair trade standard certification by 2030, guaranteeing fair and equitable remuneration for cocoa producers.



Discrimination and harassment

Risk of discrimination in the SAVENCIA workforce on the basis of sex, race, age, ethnic origin, nationality, sexual orientation, state of health, political opinions or support for trade unions, and risk of any form of harassment in the workplace.

In accordance with Articles L1152-1 to L1152-6 of the French Labor Code on psychological harassment and Article 5 of the Declaration of Human Rights, the Group does not tolerate any form of harassment or violence in the workplace. In addition, with reference to ILO Discrimination (Employment and Occupation) Convention (No. 111) of 1958, the Group prohibits and rejects all forms of discrimination in employment relations, on any grounds whatsoever.

Actions implemented	Results
GROUP	
The Group's Ethics Charter sets out the values and principles of non-discrimination to be respected on a daily basis in all activities, particularly those relating to human resources (recruitment, promotion, management, etc.). The Charter also formally prohibits all forms of harassment.	All employees are made aware of the Ethics Charter upon joining the Group.
Harassment	
Training and awareness-raising: Training and awareness-raising sessions are conducted for employees on preventing harassment. Harassment officers have been appointed in each subsidiary in France (within the HR Department and the SEC). Educational training about the risks of harassment is provided for HR and SEC officers.	
Disability	
To inform employees about disabilities and promote the recruitment and retention of people with disabilities, the Group pursues a "Disability Action" policy implemented by Disability Officers in subsidiaries. The commitment is based on four areas of action: - raising awareness to combat stereotypes; - maintaining employment; - recruitment of handicapped persons; - developing partnerships with the sheltered and protected sector. The Handicap France network of Disability Officers conducts awareness-raising campaigns based on a communication kit. An educational flyer was created in 2024, as well as a video to present the role of disability coordinators in branches, in addition to the existing disability films presenting the Action Handicap policy and the actions conducted within this framework. In 2024, to coincide with the European Disability Employment Week, a poster campaign implemented with 8 SAVENCIA ambassadors with disabilities in France to testify to the ability to thrive in one's work while living with a disability.	In 2024 the ratio of Group employees with disabilities was 4%. See Sustainability Report - Social - Company Workforce.



Actions implemented	Results
Gender equality The Group strives to promote gender equality in terms of qualification, training, remuneration and career development. To promote women's access to senior management positions, a mentoring program will be rolled out in 2025. This program supports identified talents in their career development and in their preparation for taking on responsibility. A specialized firm supports this effort. In September 2024, a Group agreement was signed with the unanimous support of the trade unions in France on workplace equality between women and men and support for parenthood, the main themes of which are as follows: ▣ A guarantee of workplace equality and non-discrimination ▣ The protection of pregnant women and breastfeeding support arrangements ▣ Prevention of sexual harassment and sexist behavior to ensure a safe and healthy work environment ▣ Promotion of gender diversity in professions and equal access to positions and jobs ▣ Introduction of parental leave (sick children, hospitalized spouse, etc.) ▣ Vocational training and equal pay. It will be deployed in France in 2025 and lead to a recommendation for international deployment.	In 2024, women accounted for 29% of the Group's managers. See Sustainability Report - Social - Company Workforce.

▣ Union rights

Risk of workers being denied freedom of association and collective bargaining rights in accordance with ILO Conventions and local regulations.

In accordance with the ILO Freedom of Association and Protection of the Right to Organize Convention (No. 87) of 1948, the ILO Right to Organize and Collective Bargaining Convention (No. 98) of 1949, and the ILO Workers' Representatives Convention (No. 135) of 1971, in order to prevent any form of discrimination on the grounds of union activity, the Group is committed to strict respect for the freedom of association of all its employees, with regard to union membership and responsibilities, in every country where it operates. SAVENCIA is committed to respecting the principles set out in the 1998 ILO Declaration on Fundamental Principles and Rights at Work: freedom of association and effective recognition of the right to negotiate.



Actions implemented	Results
GROUP	
The Group's Ethics Charter recalls that freedom of association and collective bargaining are fundamental rights. In the event of an internal restructuring project giving rise to significant consequences for labor, employee representative bodies are systematically informed and, where appropriate, consulted in accordance with the regulations in force in the countries concerned.	All employees are made aware of the Ethics Charter upon joining the Group. Under the reorganization plans completed in 2024, our objective of 90% of employee reclassifications was attained.
Social dialogue is encouraged through local employee representation bodies within each subsidiary. As part of the "Moving Towards a Societal Foundation" Roadmap project, negotiations were held with employee representative bodies in France in 2022 on the topic of "Recognizing the career paths of employee representatives." The agreement focused on the following issues: ▣ Promoting respectful labor relations with due regard for stakeholders' roles, responsibilities and individuality, all in a spirit of openness and dialogue; ▣ Supporting and enhancing the career development of employee representatives, thereby promoting their role in social dialogue at the local and central levels; ▣ Ensuring that employee representatives (elected or appointed) can fully exercise the rights and duties associated with their position, in compliance with legal and regulatory standards and collective agreements.	In Group subsidiaries with more than ten employees, more than 85% of employees have the benefit of collective employee representation bodies such as labor committees, works councils or social and economic committees (SECs). An agreement on this subject was signed with French trade unions on January 17, 2023, and has been implemented in France. See Sustainability Report - Social - Company Workforce.



Other working conditions

Risk of the absence of a formal employment relationship for permanent, temporary, seasonal and interim workers, in accordance with national regulations. Risks related to workers' living and housing conditions.

Actions implemented	Results
MILK	
In France, "Dairy Resource Coordinators" support farmers in adopting new practices to facilitate their work. Coordinators also organize working groups aimed at fighting isolation. In terms of the quality of production and breeding conditions, compliance with the Charter for Good Agricultural Practices is required by contract with all our French suppliers of cow's milk. This requirement, which is gradually being extended to all milk collection worldwide, brings into consideration the living and housing conditions on the farm.	In 2024, 79.4% of our worldwide milk supply in volume met the standards laid out in this Charter or alternative standards recognized as equivalent in the countries or sectors in question. Variations in this indicator are due to changes in collection areas and occasional re-audits. See Sustainability Report - Management of supplier relations

6.1.2. Personal health and safety

As part of its Duty of vigilance, SAVENCIA Group is mapping the risks to which its own activity exposes its employees (permanent, temporary, seasonal and temporary workers), as well as consumers.

Employee health and safety

Risk of workplace accidents leading to injury or incapacity for work, and risks to employee health (occupational diseases, psychosocial risks, etc.)

SAVENCIA Group brings together close-knit entities united by a strong business culture which guides their actions and those of their employees. Preservation of the health and physical integrity of the men and women working in and for the Group are an overarching priority at every level of the organization.



Actions implemented	Results
GROUP A “SAFETY is OUR business” program, based on an OHS Charter co-signed by the Chairman and Vice-Chairman of SAVENCIA Group, is in place in all subsidiaries. The initiative is organized through meetings with the network of OHS facilitators, and through support in the field, in France and internationally. These exchanges enable sharing of good practices in place on the sites and the embedding of the approach in the field. A set of guidelines, tools and methods is made available to all subsidiaries, particularly through regularly updated and supplemented digital tools. In 2024, the most important and most motivating actions were as follows: ▣ Enhancing safety culture, with training programs dedicated to safety at work within the subsidiaries. ▣ a high-risk prevention plan: targeted actions are implemented, such as a project to make work done on equipment and energy safer. A special Directive, prepared with specialized service providers and a few pilot sites, has been formalized and is being implemented at all industrial sites. ▣ Prevention of strenuous work and musculo-skeletal disorders: the Group has launched a vast mechanization program targeting the most at-risk positions, particularly in jobs requiring extensive handling of products and packages.	The OHS Charter has been distributed to all subsidiaries worldwide and is available in all the Group's languages and accessible to all on the OHS digital platform. The Health and Safety results are consolidated every month and distributed to all subsidiaries; they are illustrated with the main news of the month, such as good practices and records, but also incidents or accidents where there are important lessons to be shared. See Sustainability Report - Social - Health and safety of the Group's employees
Awareness-raising and training operations include: ▣ A global Occupational Health and Safety week, involving all Group subsidiaries at the same time; ▣ Mandatory training sessions in accordance with regulations; ▣ Cross-department training program to meet the management needs of departments and subsidiaries, or carried out as part of specific OHS plans; ▣ voluntary training in response to employee requests or to coincide with World Week for Health and Safety, ▣ Distribution of a monthly newsletter. An Occupational Health and Safety e-learning program has been included in the mandatory onboarding process for new employees. This specific course on the risk of accidents within the Group is available in several languages. It consists of a module common to all Group employees entitled “Target: Zero Accidents,” and a second module for managers. At the end of this training, each employee is awarded a SAVENCIA Safety card.	Subsidiaries continued conducting workplace health and safety training in 2024.



Actions implemented	Results
Psychological support is available via a hotline for employees in France and certain European subsidiaries, together with on-site counseling in the event of a serious incident.	
The Group continues to deploy an Interim Action Plan in France aimed at reducing temporary workers' exposure to workplace accidents. The plan, drawn up in conjunction with temporary employment agencies (TEAs), sets out the measures to be implemented upon selection and onboarding of temporary workers at each site, as well as during and at the end of their assignment.	To ensure continuous improvement, quarterly reviews have been organized with the major national management teams of four main TEAs. These reviews focus on monitoring implementation of the measures instituted and development of associated performance indicators.

Consumer health and safety

Risks to consumer health and safety, either directly (direct sale of Group products to consumers by a subsidiary) or indirectly (products purchased by consumers via resellers).

Risks to consumer health (excluding nutritional aspects) are generally related to the potential contamination of Group products by:

- pathogenic microorganisms responsible for food poisoning;
- foreign bodies;
- chemical contaminants (e.g. pesticides);
- food allergens (substances that provoke allergic reactions) identified by regulations.

SAVENCIA Group has established an organizational structure and operating procedures intended to help avoid any serious infringement of consumer rights, in line with its mission, "Leading the way to better food" and its desire to contribute to public health objectives.

Actions implemented	Results
Consumer information	
In addition to strict compliance with regulations, the Group is careful to ensure that the information given to consumers about its products is truthful, clear, does not suggest non-existent or exaggerated benefits, and does not mislead consumers about the product characteristics. Responsible communication is an important part of the Group's CSR commitments under the Oxygen Plan, and formally required by the SAVENCIA Responsible Eco-Design Charter.	This control is carried out by regulatory managers, quality managers, or legal experts in certain markets, assisted, if necessary, by the Group's Food Law department.
The subsidiaries are responsible for monitoring the regulatory compliance of labels and consumer communication media of any kind, and for ensuring compliance with responsible communication commitments.	See Sustainability Report - Social - Consumers and final users



Actions implemented	Results
Consumer health The Group has laid out a policy focused on preventing consumer health risks and implements quality control procedures in all the Group's production areas: ▣ discharge control: based on one or more microbiological food safety criteria, it determines the release of batches of SAVENCIA Group products for marketing to customers; ▣ specific approvals: in the event of the launch of a new product, a significant modification to an existing product, or the transfer of a product between two sites. The Group's certification process specifies that each production site must be certified based on an internationally recognized standard, ISO 22000 or FSSC 22000 (Food Safety System Certification) for certain markets. In addition, the Group recognizes, under certain conditions, several other food safety certification standards such as private standards, some of which meet the requirements of the GFSI (Global Food Safety Initiative), such as: ▣ BRCGS (Brand Reputation through Compliance of Global Standards), ▣ IFS (International Featured Standards). Managing supplier food safety risks Annual assessments of strategic suppliers of raw materials and MICAÉ (Materials, Ingredients, Consumables, Additives and Packaging) are carried out by the subsidiaries. The Group has developed audit procedures for strategic suppliers. These audits are conducted by pairs of Quality and Purchasing auditors on the basis of a grid containing the Group's requirements in terms of food safety. The results of these audits are monitored over time.	The Quality Department supports sites in implementing these foodstuff safety management systems on a case-by-case basis. A survey of certifications related to food safety is carried out annually. See Sustainability Report - Social - Consumers and final users Monitoring is done of compliance with Group quality control procedures, by area of activity of the production sites. This monitoring is provided by the reports produced by the Internal Control Department, which cover: ▣ the creation and tracking of product release inspections ▣ the observance of specific approvals: upon the launch of new products, significant modifications to an existing product, or the transfer of a product between two sites. Reporting is provided to the Group Quality Department to define and monitor improvement plans.



6.1.3. Environment

The main environmental risks identified that are liable to impact the Group's ecosystems are presented below:

▣ Water, air and soil pollution

Risks of products being released into the environment in the event of accidental spills and discharge of non-standard organic waste into the natural environment (particularly into river system around the sites).

The occurrence of these risks may be of internal origin (malfunction of the facilities, fire, human error, etc.) or external origin (climate phenomenon in particular).

Actions implemented	Results
GROUP	
The SAVENCIA Group ensures compliance with national and local regulations on the prevention and mitigation of air, water and soil pollution to lessen the negative impacts of such pollution. Although a Group policy has not yet been formalized, SAVENCIA and its subsidiaries have conducted numerous programs and action plans. The sites manage compliance with local regulations specific to each site, under the supervision of the Group's Industrial and Quality Departments.	This approach is based on the following drivers: An annual audit of all the group's industrial sites, leading to a detailed report, including a risk assessment note for the site visited. This audit focuses especially on fire risk, but also on all industrial risks identified as relevant for the site, such as climate risks, flooding, bad weather (wind, snowfall) and risks to business continuity. It provides an opportunity to make a complete inventory of all progress actions (risk control and reduction) conducted over the period concerned. See Sustainability Report - Environment - Pollution
MILK	
SAVENCIA Dairy Resources uses the CAP'2ER diagnostic tool, which considers air, water and soil pollution related to our farmers' operations by evaluating various environmental indicators. For air pollution, it measures greenhouse gas emissions, in particular methane produced by ruminant digestion and nitrous oxide emitted by manure. Regarding water pollution, CAP'2ER analyzes effluent and fertilizer management practices, assessing their impact on the quality of surface and groundwater. For soil pollution, the tool examines land use, fertilization practices and animal waste management, identifying the risks of contamination by nutrients and phytosanitary products. By providing an overview of environmental impacts, CAP'2ER helps farmers adopt more sustainable practices and reduce pollution associated with their activities.	



■ Use of natural resources, harm to biodiversity and animal welfare

Risk of excessive water use	
Actions implemented	Results
GROUP Water plays a key role in the Group's technical processes, in particular to ensure a high level of hygiene and product safety. It may also serve as a technical adjunct during manufacturing by serving as a heating or cooling medium. Water is also essential for fire prevention and firefighting installations. Water withdrawal used for SAVENCIA's operations, as well along its value chain, particularly for livestock farming and the production of agricultural raw materials, can impact local water resources. In response to these challenges related to climate change and leading to increasing water stress, SAVENCIA is committed to reducing its water needs in its own operations through its plan called Water Loop, and has set the target of reducing its water withdrawal by 10% by 2025 (versus 2015).	See Sustainability Report - Environment - water resources.
MILK SAVENCIA Fromage & Dairy is dedicated to reducing its water needs in its own operations with the Water Loop plan. The plan involves: ■ a water conservation program for each site and a more ambitious target for sites experiencing water stress ■ A conversion plan to use the water from milk and from our water treatment plants, has been initiated with a REUSE and REUTE program. Before deployment, we carry out tests which are a crucial step in the development process of this type of innovative project. These tests reduce risks and ensure that the idea is viable before moving on to more advanced development phases. Two sites are currently being tested: Saint Brice and Illoud. The implementation of ten projects identified as priorities, which makes it possible to direct investments towards the sites with the highest water consumption and/or at risk of water stress. With regard to reducing water consumption in the value chain, diagnostics are carried out on our producers, using tools based on recognized methodological rules and standards, enabling a multi-criteria environmental assessment to be carried out at the farm level. In France, the CAP'2ER® tool (Automated Calculation of Environmental Performance in Ruminant Farming) developed by the Institut de l'Élevage (Idèle) is used to carry out this assessment and to draw up action plans.	See Sustainability Report - Environment - Water resources.



Risk of harm to biodiversity and animal well-being
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Preserving biodiversity and animal populations is a necessity for the development of a sustainable farming model. In accordance with its corporate social responsibility policy and with a view to developing sustainable agriculture, the Group is committed to preserving ecosystems and promoting biodiversity development.

Actions implemented	Results
Biodiversity	
GROUP	
In 2024 SAVENCIA joined OREE. Through collaboration and sharing experience among its members, this association of committed industry participants aims to develop concrete solutions, lines of inquiry and recommendations on three priorities, including biodiversity.	As a new member, the Group takes part in discussions. See Sustainability Report - Environment -Biodiversity and ecosystems.
MILK	
Diagnostic analyses are carried out on the Group's partner producers using computer applications based on recognized methodological rules and standards that enable multi-criteria on-site environmental assessment. In France, the CAP'2ER® application (Automated Calculation of Environmental Performance in Ruminant Farming) developed by the Institut de l'Élevage (Idèle) is used to carry out this assessment and to draw up action plans. In other countries the Cool Farm Took application is most commonly used Maintenance of biodiversity is one of the indicators provided by the diagnostics. This is calculated based on an inventory of the various agro-ecological factors found on the farm, such as hectares of meadow, fallow land, linear meters of trees in rows and hedges, and shows how much that farm contributes to biodiversity.	See Sustainability Report - Environment - Biodiversity and ecosystems
COCOA	
Valrhona develops and implements numerous projects to ensure its cocoa production chains become more long-lasting and resilient. These commitments were validated by winning B Corp certification. In its sourcing areas (Belize, Brazil, Madagascar, Peru, São Tomé, Ghana and Côte d'Ivoire), Valrhona relies on Nitidae, an NGO specialized in managing projects that combine environmental preservation and initiatives to strengthen local economies, with a view to better targeting actions on the ground with an environmental impact.	In 2024, the subsidiaries of SAVENCIA Gourmet with food service activities were able to initiate the first stages of an assessment of resilience when faced with risks related to biodiversity and ecosystems, in an exploratory approach. This initial work will continue over the next few years to complete and refine the policies and action plans already initiated.



FISH	
Surimi sticks are made exclusively from sustainable North-Pacific fish. Supplies are inspected by an independent organization, guaranteeing the use of fishing practices that demonstrate due regard for the seabed, the environment, fish resources and species stocks. These deliveries are monitored by an independent organization, guaranteeing the use of fishing practices that respect the seabed, the environment, fish resources and species stocks.	In 2024, 100% of the fish in the Coraya surimi product line came from sustainable fishing, monitored by an independent body.
Animal welfare	
MILK	
For more than ten years, SAVENCIA Fromage & Dairy has been committed to a process of progress alongside its partner dairy farmers. This broad policy is based on the five fundamental freedoms of animal welfare, developed by the Farm In 2022, SAVENCIA Fromage & Dairy drew up a worldwide Animal Welfare Charter for cattle, sheep and goats with a focus on four major issues: ▣ high-quality, sustainable and local food ▣ guaranteed access to the outdoors ▣ comfortable shelter ▣ greater attention to health. This charter is part of a global approach by the Group to assess animal welfare and support breeders in a process of continual improvement.	See Sustainability Report - Governance - Animal welfare In 2024, 71.4% of Dairy Supply employees at SAVENCIA sites had received training in animal welfare. These employees have charge of audits of farms worldwide, based on recognized standards, and of creating action plans jointly with the farmers concerned. Audits were initiated from 2022, particularly in France, Central Europe and Argentina, and will continue to be rolled out progressively until 2025. By the end of 2024, 57% of livestock farms worldwide had been audited on animal welfare.
MEAT	
The Bordeaux Chesnel subsidiary maintains trusted partnerships for a more sustainable sector by supporting farmers in their transition to more responsible farming methods through its “Nos valeurs partagées” (Our shared values) progress initiative. This approach is applied for the pork and chicken sector.	92% of the pork rillettes we use come from a sustainable quality production chain. 66% of the chicken rillettes we use come from a responsible chicken production chain.
EGG PRODUCTS	
Egg products are used as ingredients in the formulation of products such as surimi, desserts, pastries and chocolates. Even though this raw material represents a minimal part of our supplies, the Group's objective is that by the end of 2025, 100% of the eggs used in the formulation of our products will come from cage-free hens.	Action plans have been implemented in the subsidiaries concerned and by the end of 2024, 99.97% of the eggs will come from cage-free hens. The in-house teams continue to work hard to ensure that the target of 100% cage-free hens is reached by 2025.



Contribution to climate change

Risk of impact on climate change

Conscious of the global challenges posed by greenhouse gas emissions, and the need to combat climate change and its consequences for society at large, the Group is working to reduce the environmental footprint of its activities to limit the risk of impact on climate change and adapt to its consequences.

Actions implemented	Results
GROUP SAVENCIA Fromage & Dairy has set a carbon reduction target of “well-below 2°C” with the SBTi (a leading organization that validates the compatibility of the climate objectives of companies or states with global warming scenarios). In this regard, the objectives are: ▣ For scopes 1 and 2, a reduction of 27.5% in absolute greenhouse gas emissions by 2030 compared to 2019; the relative emissions share of this scope 1 objective is around 72% and 28% for scope 2. ▣ For scope 3, a reduction in intensity of 22.5%, or an absolute reduction of 13.5%, in greenhouse gas emissions from purchased goods and services, fuel and energy-related activities, upstream transportation and distribution, as well as the end-of-life treatment of products sold by tonnage produced by 2030 compared to 2019. Internally, SAVENCIA's teams are focused on a reduction target based on an estimated 1.5°C trajectory, established using the SBTi methodology, which will be adjusted when the target is formally approved. As a participant in agricultural sectors, SAVENCIA is also subject to the SBTi's FLAG methodology, which is based on the GHG Protocol's Land Sector and Removals Guidance. SAVENCIA will therefore also submit a FLAG target when it submits its reduction target in line with a 1.5°C trajectory. The Group wishes to continue its efforts and will submit to the SBTi, in 2025, a carbon reduction target aligned with a 1.5°C trajectory as well as a Net Zero trajectory.	The means of reducing scope 1, 2 and 3 emissions and the corresponding indicators are described in the Sustainability Report - Environment.



DAIRY COLLECTION TRANSPORTATION	
SAVENCIA is committed to carbon reduction in transportation and travel. SAVENCIA Fromage & Dairy factors in the emissions for delivery of finished products (ex-factory) to the customers' distribution centers (scope 3). This transportation is almost exclusively managed and paid for by the SAVENCIA Group, which therefore has MEANS available to it to reduce these emissions. For our own fleet (scope 1), alternative fuels are being used: trucks are powered by biofuels like XTL, B 100 and BioGNV, enabling a significant reduction in emissions. In France, the subsidiary SAVENCIA Ressources Laitières has obtained the CO2 certification called "Les transporteurs s'engagent" ("Transporters are committed"), a national first for a milk collection activity, reflecting the commitment made several years ago to this ADEME-certified program. The inter-factory transport fleet of SAVENCIA Fromage & Dairy, Normandie Bretagne Transports, has also earned the same certification, in recognition of outstanding performance in terms of energy and the environment.	See Sustainability Report - Environment - Climate change
UPSTREAM DAIRY	
The Terroirs de lait initiative sets out two objectives for sustainable and responsible dairy supplies: ▣ Co-developing responsible dairy procurement with our stakeholders, with the extension of our Charter for best farming practices (or its equivalent by country or by sector) to all our milk sourcing worldwide, by the end of 2025 The Charter of Good Breeding Practices is divided into seven sections: animal traceability, animal health, animal feed, hygiene in milk production, socio-economic sustainability, animal welfare and the environment. ▣ Building the future with the Terroirs de lait 2032 program: securing milk supplies, ensuring the maintenance and renewal of generations of breeders and significantly improving the carbon footprint with partner producers, by making use of every method of sustainable milk production and keeping animal welfare in mind.	In 2024, 79.4% of our worldwide milk supply in volume met the standards laid out in this Charter or alternative standards recognized as equivalent in the countries or sectors in question. Variations in this indicator are due to changes in collection areas and occasional re-audits. See Sustainability Report - Environment - Climate change



COCOA	
In 2022, Valrhona joined forces with B Lab France and Ademe to accelerate its carbon reduction strategy by participating in the collective action launched around the ACT Step-by-Step methodology created in 2019. This approach, which supports companies in defining, deploying, monitoring and evaluating their emission reduction strategy, has enabled Valrhona to build a Climate Plan around the objective of reducing CO₂ emissions. These objectives have been extended to all Savencia Gourmet Food Service brands.	In 2024, in line with the step-by-step ACT approach, Valrhona will continue its commitment to this issue by implementing a 1.5°C goal, in line with the Paris Agreement. The associated action plan is based on the 5 pillars of the Valrhona Climate Plan: Innovating towards low-carbon products, Reducing impacts in production and distribution, Supporting our suppliers, Communicating with and involving our customers, Mobilizing and making our teams committed.
PACKAGING	
The Group seeks to reduce waste overproduction risk. In 2024, the Group continued implementing the Charter for Responsible Packaging drafted in 2019. This Charter sets out guidelines and orientations, particularly in terms of packaging eco-design. The Group aims to design packaging that fulfills essential functions with a reduced environmental impact.	In 2024, Valrhona, together with SAVENCIA Fromage & Dairy brands, launched a project to implement a product Life Cycle Assessment (LCA) instrument to evaluate their environmental impact and ecodesign new products. Beyond the ingredients, the packaging is also evaluated to find the best eco-designed alternatives. See Sustainability Report - Resource usage and circular economy
WASTE MANAGEMENT	
Processing activities generate waste inherent to manufacturing and packing processes. It mainly comes in the form of non-hazardous industrial waste, most of which, such as cardboard, paper, glass, steel or aluminum, is treated by recovery/recycling organizations. Presence of hazardous industrial waste is infrequent. It is mostly waste oils and electrical and electronic waste generated by maintenance operations, which are sorted for recycling by specialist contractors. To combat unnecessary use of natural resources and reduce waste treatment costs, the Group's goal is to increase industrial waste sorting and recovery and promote circular solutions with the aim of reducing risks of pollution.	SAVENCIA strives to augment the sorting and recovery of industrial waste by contributing to circular solutions. Waste-related information is gathered from the subsidiaries as part of the annual environmental reporting campaign via the Group reporting system. See Sustainability Report - Resource usage and circular economy



6.1.4. Local communities

In the course of risk-mapping in 2022, In 2022, SAVENCIA extended the scope of its analysis to local communities, i.e., people whose living conditions could be affected by the Group's activities.

SAVENCIA has been able to identify country risk factors that make certain communities particularly vulnerable to the risks of displacement, economic insecurity and access to natural resources. These risk factors result from a failure of national and local institutions and regulations to protect the fundamental rights of citizens and their environment.

The most significant risks concern the living and housing conditions of producers of agricultural raw materials in high-risk areas of the world.

The Group's commitments

Through the Responsible Purchasing Charter, SAVENCIA Group calls on its suppliers to commit to taking into account interactions with local communities, respecting property rights and ensuring that their activities do not harm the population.

Actions and monitoring of results

Work continues to further analyze the risks of harm to the rights of communities and to strengthen the corresponding prevention and mitigation measures.

The Sustainability Report details the actions undertaken to identify and remedy, where necessary, the risks concerning local communities and indigenous populations (See Sustainability Report - Social - Regional integration and impact on communities).

6.2. Responsible purchasing

Group commitments

SAVENCIA develops long-term collaborations with its main suppliers, aiming to consistently move forward to promote responsible purchasing, meet the various challenges facing society at large, and prevent the risk of breaching social and environmental rights via the supply chain.

On January 10, 2012, the Group laid a foundation for its procurement efforts by signing the Charter for Responsible Supplier Relations, a collective initiative intended to improve relations with suppliers.

In addition, adherence to a "Code of Conduct for SAVENCIA Group Purchasers" ensures compliance with responsible and sustainable purchasing practices by setting out sustainable and solidarity-based performance and progress plans consistent with the principles of integrity and ethical business.

Supplier risk mapping methodology

SAVENCIA Group considers that the Vigilance risks presented above are applicable to suppliers.

These risks are addressed through the responsible purchasing approach.

Indeed, to manage purchases in accordance with obligations of transparency, prohibition of undeclared labor and prevention of corruption and violations of human and environmental rights, the Group Purchasing Department observes a comprehensive policy of vigilance regarding its suppliers. This policy contributes to a risk-mapping initiative focused on:

- ▣ the level of "Country" risk, determined by the Transparency International Corruption Perceptions Index (CPI);
- ▣ the level of "Purchase Category" risk determined internally on the basis of CSR and operational criteria.



Selection of sustainable and responsible suppliers

The Group's suppliers are selected on criteria of quality, security, service, competitiveness and their ability to support the Group over the long term.

Initiated in 2010, the Group's responsible purchasing program is based on the Responsible Purchasing Charter, which defines the common commitments expected to ensure ethical and sustainable commercial relations between the Group's purchasing teams and suppliers.

In 2024, a process for managing this program for adherence to the Responsible Purchasing Charter was introduced, including a waiver process in the event of refusal by the supplier.

The CSR risks associated with our suppliers have been assessed, since 2010, within the framework of the EcoVadis evaluation process.

The four assessment areas are:

- ▣ Environment
- ▣ Personnel
- ▣ Ethics and corruption
- ▣ Supply chain sustainability

Since 2024, the Group has also been using the risk assessment tool offered by the Supplier Ethical Data Exchange (SEDEX) to broaden the scope of coverage of the assessments carried out with our suppliers.

These assessments are being rolled out across all our subsidiaries in successive waves, with monitoring based on three indicators:

- ▣ The number of suppliers assessed.
- ▣ The coverage rate of purchasing expenditure of the suppliers assessed.
- ▣ The average score of our panel of suppliers under assessment.

At year-end 2024, 83% of the Group's external expenditures overseen by the Purchasing function and carried out with major suppliers (exceeding € 1 million per year) were covered (excluding sourcing of agricultural raw materials).

Corrective and mitigation actions

Each supplier's CSR score is kept track of.

A remediation process is applied progressively and according to the type of supplier, depending on the score obtained. A meeting with the supplier is arranged in order to understand the negative points of the evaluation and to define the action plans to be implemented by the supplier, depending on the issue (insufficient number of indicators monitored or documentation, scope not covered, lack of commitment, etc.).

In the event that the corrective action plan is deemed insufficient, a complementary SMETA (Sedex Members Ethical Trade Audit) type audit must be carried out on site by a certified external service provider such as Bureau Veritas.

For our critical suppliers, we have defined a specific level of requirement with a minimum EcoVadis score of 50/100 or higher.



7. Report on Vigilance Plan implementation

This section details the results concerning application of the Vigilance Plan by subsidiaries and regarding suppliers in 2024.

7.1 Strategy and governance

In 2024, the Risk Management and Compliance Director, who is in regular contact with the SAVENCIA Fromage & Dairy Executive Committee, continued to oversee the implementation of the Duty of Vigilance action plan.

The Compliance Steering Committee ensured effective monitoring of the measures implemented. A summary was presented to the Group Ethics and Culture Committee (GECC) in December 2024.

7.2 Vigilance risk mapping

No new salient risks related to the Group's activities were identified in 2024 based on the Vigilance risk mapping.

The monitoring of the priority action plans under the Duty of Vigilance was presented to the Executive Committee in May and December 2024, as well as to the Audit and Risk Committee of SAVENCIA Fromage & Dairy and to the Supervisory Board of SAVENCIA Saveurs & Spécialités.

Two Compliance Steering Committee meetings were held in 2024 and provided a framework for monitoring the priority areas to be implemented in view of the significant risks identified.

7.3 Outcome of Vigilance Plan implementation within the Group

▣ Employee compliance with applicable rules

The Applicable Rules are part of Group Culture that all Subsidiaries are called upon to respect. The rules are recalled in the Ethical Charter entitled "The Group and its Culture," which is communicated to all new employees and available in the ELIUM digital library.

The Group-wide whistleblowing system SARA - SAVENCIA Recueille vos Alertes (SAVENCIA Receives your Alerts) - available to a large proportion of Group employees, helps monitor compliance with these rules by all subsidiaries. Subsidiaries must ensure that their employees are aware of the whistleblowing system (see Vigilance plan – Whistleblowing system and processing of reports).

▣ Keeping track of subsidiaries

Subsidiaries assess compliance with the rules applicable within the Group and communicate these assessments as part of their annual reporting activities (social reporting, CSR, etc.).

In particular, the effectiveness of the measures put in place is assessed on the basis of incident reports submitted to the Audit and Risk Committee, which meets four times a year.

In 2024, no specific measures were implemented in response to serious incidents.

In addition, as part of the Internal Audit Plan, the Internal Control Framework and the work of the Compliance Department, the following points are subject to specific controls:

- ▣ verification that the mandatory information concerning the existence of the Group's whistleblowing hotline, and the Anti-Corruption Code of Conduct has indeed been provided to employees;
- ▣ verification of the application of Group policies and procedures on specific subjects.

In 2024, 80% of Group employees received e-learning training on the Duty of Vigilance as part of the mandatory Compliance training program.



7.4 Outcome of application of the Plan relating suppliers

▣ Supplier compliance with the rules in force

Measures were taken in 2024 to implement the responsible purchasing program in the Group. (See Sustainability Report - Governance - Management of supplier relations)

▣ Tracking of supplier assessments

The Group draws on CSR assessments via EcoVadis to evaluate suppliers' policies and actions, and on monitoring at-risk suppliers with a higher frequency of assessment (see the Responsible Purchasing section of the Vigilance Plan).

7.5 Appropriate risk mitigation and damage prevention measures

The results of the implementation of the actions relating to the Duty of Vigilance given in this Plan refer to the SAVENCIA Group's Sustainability Report for 2024. Since indicators have been defined in accordance with the CSRD reporting requirements, particularly in terms of monitoring scope, the trend in the results will be presented again in 2025 for the next Vigilance Plan exercise.

7.6 Whistleblowing system and processing of reports

In 2024, the Group continue to strengthen internal communication around its whistleblowing system, and a specific section on ELIUM was dedicated internally to the Group's alert system. Employees can consult that publication to find the updated procedure for using the alert system. (See Vigilance plan – Whistleblowing system and processing of reports) To enhance its alert system, particularly the aspects of protection, confidentiality and anonymity, the Group has chosen a digital platform that will be introduced in all subsidiaries in 2025.

	2024
Number of alerts received through the Group alert system	21



8. Whistleblowing system and processing of reports

The SAVENCIA Group is committed to ensuring compliance with the laws and regulations, and with its Code of Ethics “The Group and its Culture” embodying its values, in all of its subsidiaries, throughout the world.

In order to uphold the Group's ethical principles, maintain a level of mutual trust and promote continuous improvement, the Group has a shared system for collecting and processing alerts, called SARA, which stands for SAVencia Recueille vos Alertes (SAvencia Receives your Alerts).

It meets the requirements of the law on the Duty of Vigilance and the Sapin 2 law, as well as those of the law on the protection of whistleblowers known as Waserman.

This alert system allows every employee in all subsidiaries, as well as every external stakeholder of the company, to make a report in a strictly confidential manner.

Within this regulatory framework, a report may concern:

- ▣ any breach or situation contrary to the SAVENCIA Ethics Charter, its Anti-Corruption Code of Conduct and Group policies;
- ▣ any crime or offense;
- ▣ any violation or attempted concealment of a violation:
 - of an international commitment duly ratified or approved by France;
 - of a unilateral act of an international organization taken on the basis of a duly ratified international commitment;
 - A law or regulation.
 - Any threat or serious harm to the public good
- ▣ A situation of serious violations of human rights and fundamental freedoms, the health and safety of individuals and the environment;
- ▣ A breach of the rules of professional practice;
- ▣ The intentional concealment of such acts;
- ▣ acts of retaliation related to having made a report or participated in its processing.

The channels dedicated to reports within the Group are:

- ▣ a hotline: + 33 1 34 58 64 14
- ▣ an email address: compliance@savencia.com
- ▣ and a postal address:
SAVENCIA Group Compliance Director
42, rue Rieussec
78 223 Viroflay Cedex FRANCE

It should be noted that in 2025, a digital platform will be accessible to all internal and external stakeholders via the SAVENCIA Fromage & Dairy and SAVENCIA Saveurs & Spécialités websites.

The principle of no sanctions or reprisals for any whistleblower who makes a report in good faith and without direct financial compensation is guaranteed by the Group and reaffirmed in its Ethics Charter, in its anti-corruption code of conduct, as well as in the document describing the Principles and rules for managing alerts of the SAVENCIA Group.

All reports are thus processed in accordance with the law and in such a way as to ensure an effective and appropriate response to each situation.



9. Appendices

FUNDAMENTAL AGREEMENTS AND DOCUMENTS

SAVENCIA Group adheres to the principles set out in the following documents:

- ▣ The Universal Declaration of Human rights;
- ▣ The United Nations Global Compact;
- ▣ The OECD Guidelines for Multinational Enterprises;
- ▣ The core conventions of the International Labor Organization (ILO);

The Vigilance Plan reflects previous commitments by the Group as expressed in the following documents:

- ▣ The Ethics Charter, entitled “The Group and its culture;”
- ▣ SAVENCIA’s “Oxygen” CSR policy (<https://www.savencia.com/rse/notre-approche-rse>);
- ▣ The Code of Conduct for Group Purchasers;
- ▣ The Charter for sustainable purchasing;
- ▣ The Workplace Health and Safety Charter;
- ▣ Procedure for using the SAVENCIA Group SARA whistleblowing system

SAVENCIA Group also ensures compliance with the commitments laid out in the following public documents:

- ▣ The Charter for Good Agricultural Practices (<http://www.charte-elevage.fr/>);
- ▣ The Responsible Supplier Relations Charter (<https://www.economie.gouv.fr/mediateur-des-entreprises/charte-relations-fournisseurs-responsables>).