

## No Deforestation Policy Global

At pladis, we bring happiness with every bite. Our purpose is more than just delivering delicious snacks; it's about creating a thriving, sustainable future for people and the planet.

As a responsible company with over 300 years of combined baking and chocolate making experience, we have a responsibility in striving to ensure the ingredients we use are responsibly sourced from both an environmental and social perspective.

This policy outlines our commitment to protecting forests and natural ecosystems from deforestation, conversion and degradation, and to upholding human rights in our operations and supply chain.

To achieve our ambitions, we will work in partnership with our suppliers in developing plans aimed at driving transformational change, improving traceability and transparency and ensuring we and our suppliers operate according to all applicable legal requirements related to forest risk commodities.

### Contents summary

1.	Key social and environmental risks.....	2
2.	Scope .....	2
3.	Policy Commitments .....	3
4.	Forest & Biodiversity Preservation.....	3
5.	Reduction of Greenhouse Gases (GHG) Emissions & Soil Conservation.....	3
6.	Human Rights & Labour Conditions.....	3
7.	Traceability .....	4
8.	Transparency .....	4
9.	High Level Implementation of the Policy .....	4
10.	Definitions.....	5
11.	Policy review.....	7

## 1. Key social and environmental risks

We recognise that some ingredients can contribute to deforestation, biodiversity loss and human rights challenges but in the right hands, these ingredients can be crafted to bring moments of happiness for snack-eaters around the world.

By acting as responsible stewards of the places we source from and operate in, we help ensure those challenges are overcome and support farmers, communities and ecosystems—and safeguard our business for the long term.

We are committed to protecting forests and natural ecosystems from deforestation, conversion and degradation<sup>1</sup>, to supporting forest conservation solutions for high conservation landscapes and to respecting human rights in accordance with international norms.

## 2. Scope

The scope of this document covers all operations and suppliers, involved in the production, processing, procurement and trading of pladis' primary forest risk commodities<sup>2</sup> and their derived products. Direct suppliers should implement the principles outlined in this policy both within their internal operations and third-party supply chains.

The pladis No Deforestation policy is designed to align with International frameworks as well as pladis specific sustainable materials policies as released from time to time and is based on the following in-scope materials:

- Cocoa (cocoa beans and all related components including raw, semi-or finished forms)
- Palm Oil (and derivatives)
- Sugar Cane (and cane sugar syrup)
- Pulp & Paper (Corrugated, Paperboard, Flexible Paper)

---

<sup>1</sup> as defined by the Accountability Framework Initiative

<sup>2</sup> Scope includes materials directly purchased by pladis. Scope may not include the following materials linked to small scale and/or complex supply chains where assessments continue:

- Derivatives referring to oil or oil fractions primarily related to palm and/or soy that have been chemically modified
- Embedded commodities e.g. sugar in chocolate or jam, soy in cattle feed for dairy products
- Paper and Board related to point of sale, stationary use and specialty items
- Other specialty products (e.g. flavours, food additives etc.)

This policy should be applied and read in conjunction with other pladis policies, such as the pladis Supplier Code of Conduct, Human Rights Policy, EUDR Supplier Requirements Policy and other extant policies. These further outline commitments related to responsible sourcing. We recognize suppliers may need time to comply with these policies and will collaborate with our suppliers to transition them to full implementation.

In-scope suppliers must comply with all relevant local, national, and international laws regarding deforestation and forest degradation.

Suppliers in scope of the European Union Deforestation-free Regulation (EUDR 2023/1115) (hereafter referred to as EUDR) should also refer to the pladis EUDR Supplier Requirements Policy which take precedence.

### **3. Policy Commitments**

Our suppliers are required to apply the following principles across their operations and sourcing:

### **4. Forest & Biodiversity Preservation**

- No deforestation and protection of forests and natural habitats including High Carbon Stock Forests (HCS), High Conservation Value (HCV) areas, Intact Forest Landscapes (IFLs), peatlands and other natural ecosystems.

### **5. Reduction of Greenhouse Gases (GHG) Emissions & Soil Conservation**

- No sourcing of materials from areas of peatland, regardless of whether they are actively harvested or degraded.
- No burning to clear land for new developments or to re-plant existing developments.
- Ongoing engagement to ensure that no new developments or activities occur on peatlands within sourcing operations.

### **6. Human Rights & Labour Conditions**

- Compliance with pladis' Human Rights policy.
- Appropriate policies and/ or processes in place to ensure that fair labour practices are upheld and that all workers are treated with respect and have their rights protected.
- Internal grievance systems in place, giving workers access to fair procedures and remedies
- No Exploitation of people or communities, recognizing the rights of indigenous and local communities to give or withhold their free, prior and informed consent (FPIC) to

the utilization of lands to which they hold legal, communal, or customary rights.

## 7. Traceability

- Improved supply chain traceability to assist pladis in achieving 100% traceability back to refineries and mills and improved year-on-year traceability rate to farms / plantations for in-scope commodities.

## 8. Transparency

- External grievance system in place, allowing stakeholders to report breaches of no deforestation, conversion or exploitation principles.

## 9. High Level Implementation of the Policy

- pladis will require suppliers to communicate this policy, or their own equivalent policy with the same requirements, down their supply chains.
- pladis will require suppliers to provide training to staff and suppliers on the importance of this policy and how to implement its requirements.
- pladis will include this document in the standard terms and conditions of doing business.
- pladis will conduct risk assessments and partner with industry experts and NGOs to identify suppliers at risk, develop implementation plans and, when needed, organize capacity building sessions on no deforestation, conversion or exploitation principles.
- pladis will work with suppliers to address non-conformances in pladis' supply chain. \_
- pladis will define key performance indicators to measure performance against No Deforestation, policy and provide periodic progress updates.
- pladis will take appropriate initiatives and potentially legal actions, if that supplier fails to comply with this policy or recommended remedial action.
- pladis will review this policy on a periodic basis to ensure it is fit for purpose and reflects a philosophy of continuous improvement. Changes will be communicated to suppliers accordingly.

Announced on September 30th, 2025,

  

---

Tim Brett (Oct 1, 2025 16:34:35 GMT+2)

Signed by:

**Tim Brett**

**Managing Director, Europe and Emerging Markets**

## 10. Definitions

Definitions are taken from the [Accountability Framework](#) unless otherwise specified.

Conversion	Loss of a natural ecosystem because of its replacement with agriculture or another land use, or due to a profound and sustained change in a natural ecosystem's species composition, structure, or function.
Deforestation	Loss of natural forest because of: (i) conversion to agriculture or other non-forest land use; (ii) conversion to a tree plantation; or (iii) severe and sustained degradation.
Degradation	Changes within a natural ecosystem that significantly and negatively affect its species composition, structure, and/or function and reduce the ecosystem's capacity to supply products, support biodiversity, and/or deliver ecosystem services
Exploitation	Practices that violate human rights or result in adverse social impacts, including but not limited to forced labor, child labor, and unfair treatment of local communities. The <a href="#">ILO's Declaration on Fundamental Principles and Rights at Work</a> provides a framework to prevent exploitation by promoting universal principles of workers' rights.
Forest	Land spanning more than 0.5 hectares with trees higher than 5 metres and a canopy cover of more than 10%, or trees able to reach these thresholds in situ. It does not include land that is predominantly under agricultural or other land use. Forest includes natural forests and tree plantations. For the purpose of implementing no-deforestation supply chains, the focus is on preventing the conversion of natural forests.
Free, prior, and informed consent (FPIC)	A collective human right of Indigenous Peoples and local communities to give and withhold their consent prior to the commencement of any activity that may affect their rights, land, resources, territories, livelihoods, and food security. It is a right exercised through representatives of their own choosing and in a manner consistent with their own customs, values, and norms
Grievance mechanism	Any routinised process through which grievances concerning business-related negative impacts to human rights or the environment can be raised, and remedy can be sought. Grievance mechanisms may be state-based or non-state-based and they may be judicial or non-judicial.
High Carbon Stock (HCS)	High concentrations of carbon contained in the vegetation and soils of High Carbon Stock (HCS) forests. <sup>3</sup>
High Conservation Value (HCV)	A biological, ecological, social, or cultural value of "outstanding significance

<sup>3</sup> High Carbon Stock (HCS) approach aims to identify areas of land suitable for development and forest areas that merit protection, while securing the rights and livelihoods of communities. defined in [The HCS Approach Toolkit Version](#)

	or critical importance" at a global, regional, or local level. <sup>4 5</sup> There are six categories of HCVs: species diversity, landscape-level ecosystems, rare ecosystems and habitats, critical ecosystem services, community needs, and cultural values.
Indigenous Peoples	Distinct groups of people who satisfy any of the more commonly accepted definitions <sup>20</sup> of Indigenous Peoples, which consider (among other factors) whether the collective: • has pursued its own concept and way of human development in a given socioeconomic, political, and historical context; • has tried to maintain its distinct group identity, languages, traditional beliefs, customs, laws and institutions, worldviews, and ways of life; • has at one time exercised control and management of the lands, natural resources, and territories that it has historically used and occupied, with which it has a special connection, and upon which its physical and cultural survival typically depends; • self-identifies as Indigenous Peoples; and/or • descends from populations whose existence pre-dates the colonisation of the lands within which it was originally found or of which it was then dispossessed. When considering the factors above, no single one shall be determinative. Indigenous Peoples are defined as such regardless of the local, national, and regional terms that may be applied to them, such as 'tribal people,' 'first peoples,' 'secluded tribes,' 'hill people,' or others
Natural ecosystem	An ecosystem that substantially resembles — in terms of species composition, structure, and ecological function — one that is or would be found in a given area in the absence of major human impacts. This includes human-managed ecosystems where much of the natural species' composition, structure, and ecological function are present.
Peatlands	Wetlands with a buildup of peat, which store significant amounts of carbon and provide critical ecological functions.
Traceability	The ability to follow a product or its components through stages of the supply chain (e.g., production, processing, manufacturing, and distribution).

<sup>4</sup> Originally developed by the Forest Stewardship Council (FSC)

<sup>5</sup> High Conservation Value (HCV) approach identifies and protects HCVs from the impacts of land-use change. [HCV Approach | HCV Network](#)

11. **Policy review**

- 12. Approver: CHRO/CPO/CCASO
- 13. Accountable owner: Global Sustainability Director
- 14. Date of publication: September 2025
- 15. Date of last update: September 2025
- 16. Date of next review: September 2028