



KERRY GROUP PLC

# Modern Slavery and Human Trafficking Statement 2023

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The following statement sets out the actions taken by Kerry Group plc ("Kerry Group" or "Kerry") to address modern slavery and human trafficking risks across our business and value chain for the financial year ending 31st December 2023.

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At Kerry Group, we are firmly committed to improving our practices to combat slavery and human trafficking in our business and value chain and upholding the rights of workers. Modern slavery and human trafficking are unacceptable practices that exploit some of the most vulnerable people and Kerry supports all efforts to eradicate these and other human rights abuses from international business and global value chains.

It is a priority for Kerry Group to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

In this statement, Kerry Group reports on its actions to assess and address modern slavery risks associated with its operations, including its employment practices and the protections provided for workers during the 2023 financial year. Furthermore, this statement also outlines how Kerry is assessing and addressing modern slavery risks within its supply chain, including the efforts with supply partners to mitigate this risk.

### Our Business

Kerry Group plc is a public limited company incorporated and headquartered in Ireland. Kerry Group is a global leader in the food and beverage industry, with a presence in over 55 countries and 137 manufacturing locations across the world. Kerry Ingredients (UK) Limited, Kerry Foods Limited, Dairy Consumer Foods (UK) Limited and Kerry Ingredients Australia Pty Ltd are wholly owned subsidiaries of Kerry Group plc and are our main operating entities in the UK and Australia respectively.

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

At Kerry, we are driven to be our customers' most valued partner, creating a world of sustainable nutrition.

The Group is structured across two business segments as follows:

### Taste & Nutrition

Kerry is a world-leading provider of taste and nutrition solutions for the food, beverage and pharmaceutical markets. We use our broad range of ingredient solutions to innovate with our customers to create great tasting products, with improved nutrition and functionality, while ensuring a better impact for the planet. Our leading consumer insights, R&D team of over 1,100 food scientists and extensive global footprint enable us to solve our customers' most complex challenges with differentiated solutions.

### Dairy Ireland

Dairy Ireland is a leading provider of Irish value-add dairy ingredients and consumer products. Our dairy ingredients product portfolio includes functional proteins and nutritional bases, while our well-loved dairy consumer brands can be found in chilled cabinets in retailers across Ireland and the UK.

### Our Supply Chain

As a global organisation, Kerry Group sources raw materials from thousands of suppliers around the world and we have a direct contractual relationship with almost 3,000 dairy farmers in Southwest Ireland. With a total raw materials and consumables spend in excess of €4.1 billion in 2023, we make a significant socio-economic contribution to the communities from which we source.

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

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

## Our Policies

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

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

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

While our Ethics and Compliance, Human Resource and Procurement functions take a lead role on upholding human rights, accountability is cross-

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

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

## Our Approach

Our management of modern slavery risk across our operations and supply chain falls within our broader approach to human rights.

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

Our policies are communicated and available to all employees, ensuring that all colleagues are informed and understand our requirements. We also make Kerry Group's confidential whistleblowing reporting system, Speak Up, available for employees and other stakeholders to report concerns.

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

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

We identify human rights risks by combining internal knowledge with a range of external data, independent tools and benchmarks and risk assessments. Through this risk mapping process, we have a better understanding of the risks associated with both the production sites of our raw materials and the agricultural origin of commodities, where these are different. However, where there are a number of tiers between the supply site and the agricultural source of

the raw material, it is more difficult to achieve visibility of labour practices at each stage of the chain.

To strengthen these ongoing efforts, we undertook a formal structured process with a third-party in developing an improved understanding of our salient human rights risks and impacts across our entire value chain, to include internal operations, third-party manufacturers, and supply chain. This exercise was completed from the perspective of rightsholders in line with UN Guiding Principles on Business and Human Rights (UNGPs). Led by the Social Sustainability Council, the outputs of this work have been incorporated into an integrated roadmap and implementation will be progressed through 2024.

## Due Diligence

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

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

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

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

As a member of Sedex (Supplier ethical data exchange), we use this platform to help us assess supplier ethical performance. We continue to seek registration of suppliers with whom we conduct business in high-risk countries with the Sedex platform. In 2023, 88% of our spend with suppliers in high-risk countries were enrolled on Sedex and 65% of our spend with suppliers in these high-risk countries have undergone a Sedex Members Ethical Trade Audit (SMETA) in the last three years. We continue to engage with the remaining suppliers in high-risk countries requesting their registration with Sedex, along with any new suppliers in these high-risk countries.

Our Procurement teams, in collaboration with Sedex, directly engage with high-risk suppliers through facilitated workshops that help suppliers to understand and meet our expectations.

In addition to our Sedex platform, our Global Supply Quality team have had active engagement with suppliers across all regions, conducting over 1,200 supplier food safety audits in 2023. These audits include high level human rights queries as part of the broader supplier risk assessment process.

## Grievance Mechanism, and Remediation

We are committed to creating effective grievance mechanisms and addressing and remedying adverse human rights impacts.

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

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

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

In 2023, there were no reports of trafficking or modern slavery received through the Speak Up service.

## Assessing Progress, Communication and Training

In 2023, we continued to engage with our suppliers directly and through the Sedex platform to ensure the effectiveness of our approach and build awareness of Kerry's requirements. In addition, Kerry manufacturing sites register on the Sedex platform, and many are covered by independent SMETA audits, with learnings

from this process shared to improve overall Group performance.

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

Internally, Kerry continues to make its policies available to employees and other stakeholders via a number of internal and external channels, communicating on any relevant changes or updates. This includes communications on Kerry's intranet, learning management system and external website. The Code of Conduct is available in 26 languages, and we are focused on ensuring that everyone at Kerry understands these requirements and their universal application regardless of role, seniority or location.

Our dedicated training and certification programme helps us to monitor this, and in 2023, over 80% of required colleagues achieved Code of Conduct certification. This training covers the key elements of our Code of Conduct, which incorporates our commitment to upholding human rights. In addition, we also have dedicated training modules on our Speak Up Policy and a broader employee development programme called 'Sustainability Essentials', which enables company-wide knowledge, capability and engagement in crucial areas, including social sustainability.

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

## Approval for this Statement

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth) and constitutes Kerry Group's slavery and human trafficking statement for the financial year ending 31 December 2023. Where required, the statement has been approved by the boards of the relevant legal entities on or before 30 June 2024.



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