KERRY GROUP PLC

Modern Slavery and Human Trafficking Statement 2025

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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 31 December 2025.[1]

At Kerry, we are firmly committed to improving our practices to combat slavery and human trafficking in our business and value chain as well as 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.

Kerry has established a global human rights approach that prioritises ethical trade, responsible sourcing and prevention of modern slavery and human trafficking throughout our organisation and in our supply chain.

In this statement, Kerry 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 2025 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.

For further information on our approach to human rights, including our commitments, practices and governance, please visit our Sustainability Statements on Kerry.com.

Our Business and Organisational Structure

Our Purpose, Inspiring Food, Nourishing Life underpins our culture and is reflected in our values. The Group's purpose is guided by the Group's Vision to be our customers' most valued partner, creating a world of sustainable nutrition. Kerry is a world leader in sustainable taste and nutrition solutions. Using our unique capabilities, we partner with customers to create healthier, tastier, and more sustainable products enjoyed by over one billion people around the world.

Kerry Group plc is a public limited company incorporated and headquartered in Ireland. Kerry is a global leader in the food and beverage industry, with a presence in over 50 countries and 119 manufacturing facilities across 34 countries.

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 19,000 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.

As of 31 December 2025, our reporting entities' headcounts were as follows:

Reporting Entity Jurisdiction:	Headcount:
California	97
United Kingdom	1,266
Australia	301
Canada	563

Strategic Priorities

Our Strategic focus is on food and beverage markets, with our strategic priorities being Taste, Nutrition, and Emerging Markets.

- **Taste**. Our leading portfolio of differentiated Taste technologies, natural from-food-for-food capabilities and expertise in sensory science enables us to deliver complex authentic taste experiences and overcome nutritional, cost, and sustainability challenges with no compromise on taste.

- **Nutrition**. Our broad portfolio of Biotechnology solutions enables products with enhanced nutrition, cleaner labels, science-backed proactive health benefits, preservation and sustainability. Integrated with our Taste capabilities, we are uniquely well-positioned to deliver these benefits for customers.

- **Emerging Markets**. We have a winning model in emerging markets. Our local focus, combined with our global expertise and capabilities, supported by our leading presence across emerging markets, have been key to our strong long-term track record of growth in emerging markets.

[1] This consolidated statement addresses the 2010 California Transparency in Supply Chains Act, UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Commonwealth), and the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2023. Reporting entities under the 2010 California Transparency in Supply Chains Act include: Kerry Inc. and its family of companies. Reporting entities under the UK Modern Slavery Act 2015 include: Kerry Ingredients (UK) Ltd; and Kerry Management Services (UK) Ltd. Reporting entities under the Australian Modern Slavery Act 2018 include: Kerry Ingredients Australia Pty. Ltd. Reporting entities under the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2023 include: Kerry (Canada) Inc.

Our Supply Chain

As a global organisation, Kerry Group sources raw materials from thousands of suppliers around the world. We source our natural raw materials from a global network of raw material suppliers across 80 countries. In 2025 our total spend on raw materials and consumables was approximately €4.3 billion.

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.

The global nature of our supply chain can heighten our exposure to potential negative human rights impacts, including risks of forced labour and child labour. Although these challenges often stem from systemic issues within supply chains, such as poverty and inadequate regulatory oversight, we employ various measures and controls to cease, prevent and mitigate these issues if they arise.

Specifically, Kerry is a member of the Supplier Ethical Data Exchange (Sedex) a third-party platform that enables organisations to understand, prioritise, manage, and mitigate human rights and environmental risks across global supply chains.

We also conduct an annual risk assessment of our sourcing countries and commodities to identify suppliers that are at a higher risk for negative human rights impacts. Once identified as higher risk, those suppliers are expected to become Sedex members, initiate and maintain an active link with Kerry, complete SAQs, and undergo independent SMETA audits. For example, in India, Malaysia and Thailand our risk assessment determined that rightsholders, including women, migrant workers, were at a heightened risk of child and forced labour. During SMETA audits, workers are interviewed which can highlight if labour issues are arising in a suppliers' direct operations or through its recruitment of third-party workers. If identified, the supplier will receive a non-conformance. SMETA audits are monitored for non-conformances by procurement, and suppliers are proactively engaged and supported to remedy issues. We continuously monitor and engage with suppliers to improve adherence to these requirements. For further information on our approach to Sedex, please see our Due Diligence Section below.

For more information on our business and supply chain, please see our latest Annual Report located at: https://www.kerry.com/investors.

Our Policies

The Kerry Group Code of Conduct (the Code of Conduct) is the foundation for how we work at Kerry and represents our dedication to integrity and always doing the right thing. It sets out our zero tolerance for the use of forced, bonded, indentured or involuntary labour in our own operations or in any activities connected with Kerry.

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. 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**, available on our intranet and website, outlines our commitment to upholding internationally recognised human rights throughout our value chain. Our Human Rights Policy aligns with internationally recognised frameworks, including the UN Guiding Principles on Business and Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, UN Sustainable Development Goals (UN SDGs) and the OECD Guidelines for Multinational Enterprises, amongst others. This policy underscores our commitment to uphold essential human rights through ongoing human rights due diligence within our own workforce and throughout our entire value chain, explicitly opposing human trafficking, forced labour, and child labour. It also outlines key activities to address material impacts and risks related to salient human rights issues in our own operations and upstream value chain. Kerry is committed to the continuous review and enhancement of our due diligence processes.

- Kerry's Human Rights Policy also sets out Kerry's **No Child or Forced labour Policy,** which explicitly addresses forced or compulsory labour and child labour. The policy states that Kerry only hires employees on a voluntary basis and does not tolerate any form of unacceptable treatment of workers. It also states that no child below the age for finishing compulsory schooling, or 15 years of age (whichever is the greater) may be employed by a supplier, subject to ILO exceptions.

- Our **Speak Up Policy** provides guidance for individuals (inside and outside of the organisation) 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 the Supplier Code of Conduct 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. In 2025, the Supplier Code of Conduct was updated to detail our expectations that suppliers must communicate and apply the Code of Conduct throughout their supply chain, language was strengthened in line with ILO guidance on child labour, and expectations of forced labour were expanded to include 'direct and indirect' employees, that workers should not pay for PPE, and ID documents should not be withheld. Where suppliers are found to have contravened the requirements set out in these policies, 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.

  Kerry's Supplier Code of Conduct is informed by the ILO's core conventions and several other guidance documents. It clearly sets out what is required of direct suppliers to ensure they meet the standards deemed acceptable by Kerry. This includes provisions addressing the safety of workers, human trafficking, the use of forced labour or child labour, and is fully in line with our human rights policy.

- Our **Responsible Employer Policy** outlines our commitment to safeguarding employee rights and contributing to their wellbeing as we grow our business together. Our commitment also extends to active social dialogue frameworks, ensuring effective consultation and information-sharing processes, through a range of employee representative bodies, including Works Councils and unions.

  Kerry's policies and processes ensure that we consistently provide our employees with fair and compliant compensation and working conditions, meeting or exceeding all applicable employment laws, including those relating to:

  - Adequate wages
  - Freedom of association, social dialogue and collective bargaining
  - Secure employment
  - Work-life balance
  - Working time

- Our **Diversity, Inclusion & Belonging Policy** ensures respectful and professional treatment for all employees, with their uniqueness and perspectives valued, including their backgrounds, experiences, and viewpoints, fostering an inclusive culture where everyone can belong.

- Our **Bullying, Harassment and Violence-Free Workplace Policies** sets out our zero tolerance for bullying, harassment and violence of any kind towards any individual or group. Our focus is on developing a highly engaged workforce and a safe work environment where we treat each other with dignity and respect and where all workplaces are safe and free from harmful situations.

We continuously review and update all our policies, as required. Our policies have been developed through extensive consultation with both internal and external stakeholders. We are committed to engaging with key stakeholders, including our employees, business partners, primary producers, and local communities to better understand our impacts and incorporate these perspectives into our business activities. Kerry is a member of a number of trade organisations and multi-stakeholder platforms though which it engages with key stakeholders and interest groups.

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.

The Chief Human Resources Officer (CHRO) and Chief Operating Officer (COO), who are members of the Executive Leadership Team, are jointly accountable for the implementation of our Human Rights Policy. Our Social Sustainability Council, supported by the Social Sustainability Working Group, oversees the implementation of our Human Rights Policy throughout our operations and in our supply chain. This cross-functional working group is responsible for delivering on the Group's human rights commitments, including creating, administering, updating, and communicating these policies and related training.

Our Approach to Assessing and Managing Risk

Our management of modern slavery risk across our operations and supply chain falls within our broader approach to human rights which is informed by appropriate internal engagement and governance forums across all regions and locations. We have identified potential human rights impacts and risks across our value chain through an independent Human Rights Assessment. Please see Appendix 1 of

the Human Rights Policy for a mapping of which policies address the human rights issues Kerry prioritises.

To eliminate or mitigate any adverse human rights impacts and monitor the effectiveness of processes implemented to remediate these negative impacts Kerry:

- Actively manages risks, conducts regular risk assessments, evaluates the effectiveness of existing controls, and monitors the execution of risk management strategies.
- Performs ongoing monitoring to swiftly detect and address potential issues.
- Conducts periodic reviews of existing mechanisms to evaluate and adjust as needed.
- Manages reports and handles grievances within its existing whistleblowing system.

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.

The agricultural sector is considered higher risk for various forms of labour exploitation, including modern slavery. As part of our efforts in 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 forced or compulsory labour (which is inclusive of human trafficking and/or modern slavery).

In 2024, we expanded our risk assessment to include a new dimension. This expanded risk assessment remained in use in 2025. Commodity risk was assessed to identify additional raw materials sourced from countries with an elevated risk of forced and child labour infringements. The associated suppliers were added to our scope of suppliers considered to be higher risk.

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.

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, including Kerry's Supplier Code of Conduct.

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. Through our review of issues identified in SMETA audits in the upstream value chain, we can see that in most cases suppliers are independently closing out issues as they arise. If an issue arises that needs further attention, we directly engage with our supplier to understand the problem and support them to remedy it.

We continue to work with the wider industry to share best practices and gain perspectives on common challenges in human rights and responsible sourcing. This year, we engaged with a human rights consultancy to assess human rights risks in a Conflict-Affected and High-Risk Area (CAHRA). This work now provides us with clarity on the implications connected to our business in such zones where human rights risks are greater due to conflict. To address these risks, supplier engagement remains key to further embedding responsible sourcing practices across our upstream value chain.

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

We use the Sedex platform to support our approach to identify, assess, cease, prevent, mitigate, track, and communicate instances where human rights are not

respected in our upstream value chain. In 2025, 91%[2] our higher-risk suppliers were linked with Kerry on the Sedex platform. Of those higher-risk suppliers, 80% have completed a SMETA audit within the past three years. We continue to engage with the remaining suppliers in higher-risk countries requesting their registration with Sedex and completion of a SMETA audit, along with any new suppliers in these higher-risk countries.

In addition to our Sedex SMETA audit expectations, our Global Supply Quality team have had active engagement with suppliers across all regions, conducting over 1,300 supplier food safety audits in 2025.

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. Kerry's AskHR platform (available internally to employees in 18 languages) also allows our employees to log their concerns or incidents. In addition, to support our employees globally, we provide access to an Employee Assistance Programme (EAP), offering an additional confidential support mechanism for employees to discuss and gain advice on issues relating to their working and/or personal life.

At Kerry, we have established grievance mechanisms, including our independently operated Speak Up platform (available as a website and hotline to employees and third parties 24 hours a day, seven days a week in over 100 languages), which enables them to report concerns confidentially, safely, and anonymously (where permitted by local laws). We track any formally reported complaints, ensuring that they are investigated in line with established processes, and appropriate action taken where complaints are substantiated.

All reports received to the Speak Up platform are reviewed by Kerry's Ethics & Compliance team and are treated promptly and confidentially. The Speak Up Program is overseen by Kerry's Business Integrity and Legal Operations Director, who reports into the General Counsel and the Audit Committee; and provides updates on the Speak Up program and activity throughout the year.

Kerry does not tolerate retaliation against those who Speak Up in good faith in relation to potential, perceived or actual wrongdoing, no matter what channel they use to Speak Up. We seek to provide a safe, healthy and productive workplace for our employees and our business partners, including value chain workers, who assist us in our business operations.

Through the SMETA audit process, incidents of supplier non-conformance were identified, which may serve as indicators of potential human rights issues. In 2025, these non-conformances primarily related to working conditions and living standards. We engage directly and indirectly with suppliers to facilitate the implementation of corrective actions for identified non-conformances, ensuring that these corrective actions are sufficiently robust. Aligned to the characteristics of severity outlined in the UNGP Reporting Framework in the form of scale, scope, or irremediable character, no severe human rights issues or incidents were reported in the upstream value chain in 2025 through either the SMETA audit process or the Speak Up channel.

Human Rights related Complaints

In 2025, Kerry received 258 complaints of which 50 related to incidents of discrimination, including harassment. Of the total incidents/complaints received, 100% were reviewed and 92% have been closed following review and relevant action.

None were deemed as severe cases of human rights incidents. There are no fines, penalties, or compensation related to reported incidents during the year.

A number of activities took place during the year to ensure awareness of grievance and Speak Up channels and completeness of data. In 2025, the architecture of our grievance mechanisms has been improved, and the internal governance has been strengthened, to support registration of incidents reported and investigated. We will continue to promote our grievance and speak up channels and Our Bullying, Harassment and Violence-Free Workplace Policies and framework as part of our company-wide campaigns.

Assessing Progress, Communication and Training

In 2025, 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

[2] Based on a proportion of Kerry's overall spend with higher-risk suppliers.

covered by independent SMETA audits, with learnings from this process shared to improve Kerry's overall performance.

Building on our supplier training delivered in China and India in 2024, we have expanded the reach of our training programmes to further enhance awareness of human rights standards and build compliance capability in additional high-risk geographies.

Through our membership of AIM-Progress, we co-sponsored four supplier human rights due diligence capability training programmes in India, Malaysia, Mexico and Thailand commencing in 2025. These programmes combine online webinars and in-person workshops, with over 100 of our suppliers having registered for the training.

These programmes are led by local implementation partners, focused on developing suppliers' understanding and implementation of human rights due diligence in their operations and value chain activities. This training is delivered in the local language and allows for local culture and regulatory context to be considered. We will continue to expand our training and capability initiatives, with a focus on improving our suppliers' ability to identify, manage and mitigate potential human rights risks and impacts in the upstream value chain.

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 capability 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, e-learning management system and external website. Kerry's Code of Conduct, Supplier Code of Conduct, Human Rights Policy and Speak Up Policy are all available to suppliers and external stakeholders on our kerry.com website. The Code of Conduct, Supplier Code of Conduct and Speak Up Policies are available in multiple languages. We are focused on ensuring that everyone at Kerry understands these requirements and their universal application regardless of role, seniority or location.

All employees are required to undertake annual compliance training which includes Code of Conduct and Speak Up training. This dedicated training program covers the key elements of our Code of Conduct and Speak Up Policy and incorporates our commitment to upholding human rights. Kerry has a dedicated Compliance Training Steering Committee that monitors and oversees compliance training completion across all new joiners and existing employees.

We also have a broader employee development programme called 'Sustainability Essentials' and in 2024 we launched a senior leadership course called 'This is Sustainable Nutrition', both of which enable knowledge, capability and engagement in crucial areas, including modules on responsible sourcing and social sustainability.

Additionally, we implemented measures to mitigate the risks of negative human rights impacts and uphold our commitments:

- Continued to strengthen our risk assessment to incorporate additional commodity specific human rights risks and map newly identified risks to suppliers and potentially impacted stakeholders.
- Enhanced the Human Rights policy to more closely align it to Kerry's salient human rights issues and strengthen language related to forced or compulsory labour and compliance.
- Contributed to an independent benchmark assessment on our Responsible Sourcing Journey, which allowed us to be benchmarked against the wider food and beverage industry on our human rights and environmental due diligence (HREDD). The findings from this benchmark have allowed us to identify areas where we are leading and have highlighted some opportunities for future growth in HREDD.

Stakeholder Engagement

Our Executive Leadership Team supports Kerry's engagement processes with upstream value chain workers by providing governance, resource and support through our CHRO and COO.

The Procurement team have day-to-day responsibility for engaging with upstream value chain partners who supply materials to our manufacturing facilities in line with our Supplier Requirements Manual and Supplier Code of Conduct. Core to these supplier requirements is upholding human rights and these are discussed with suppliers as we engage them to undertake audits, seek to resolve audit non-conformances and through supplier training on human rights.

To ensure the Procurement team is supported to lead engagement on human rights, regular human rights governance meetings and training events are provided to build capability on:

- Our expectations for suppliers on human rights due-diligence;
- The value of SMETA audit engagement for suppliers' operations and human rights practices; and

- Our expectations of suppliers on Sedex and SMETA audit protocols, particularly related to corrective action planning and issue remedy.

These ongoing engagement initiatives play a crucial role in integrating human rights management into our core procurement business practices and allow for feedback from our suppliers to ensure continuous improvement.

The SMETA audit process, a key component of our human rights' due diligence process, involves interviews with a representation of all workers including migrant workers, casual, temporary, seasonal workers, and women. These interviews explore critical issues such as workplace conditions, forced labour indicators such as workers' access to legal documentation, discrimination based on race, gender, and disability amongst others. Insights gathered through this process are shared through the Sedex platform, reviewed by Kerry, and play a vital role in shaping how we engage with suppliers to uphold human rights for workers in the upstream value chain.

Kerry is a member of various trade organisations and multi-stakeholder groups, fostering dialogue with key upstream value chain stakeholders and their representatives. Our involvement spans several industry initiatives, including the Roundtable on Sustainable Palm Oil (RSPO), Palm Oil Collaboration Group (POCG), Sustainable Agriculture Initiative (SAI), Sustainable Spices Initiative (SSI), AIM-Progress and the Centre for Child Rights in Business (CRIB). This comprehensive engagement strategy enables Kerry to better influence HREDD best practices and improve both direct and indirect engagement with our value chain partners.

Our approach for engaging with workers in our upstream value chain is designed to further a mutual understanding of human rights requirements with our suppliers and enhance their compliance. This engagement highlights the challenges and opportunities, informing actions for continuous improvement in our suppliers' due diligence practices.

Approval for this Statement

This consolidated statement is made pursuant to the 2010 California Transparency in Supply Chains Act, UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Commonwealth), and the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2023, and constitutes Kerry Group's slavery and human trafficking statement for the financial year ending 31 December 2025. Where required, the statement has been approved by the boards of the relevant legal entities on or before 30 June 2026.



Edmond Scanlon

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John Cahalane

President and Chief Executive Officer
Kerry (Canada) Inc. and Kerry Inc.