



**FrieslandCampina**   
*nourishing by nature*

# Modern Slavery Statement 2025

Royal FrieslandCampina N.V.

# Modern Slavery Statement 2025

Royal FrieslandCampina N.V. (hereinafter “FrieslandCampina”) is committed to making dairy the right way: with respect for people, animals and the planet. We combine craftsmanship and innovation to offer food that is good for everyone, today and tomorrow. We call it “Doing Dairy Right”. We are committed to respecting internationally recognised human rights, which covers combating modern slavery.

This statement sets out how we, together with our subsidiaries, identified and addressed modern slavery risks in our operations and supply chain in the period of 12 months ending on 31 December 2025.

This statement is published in accordance with the California Transparency in Supply Chains Act 2010, the United Kingdom Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

When preparing this statement, all our subsidiaries were informed and had the opportunity to contribute to. Our subsidiary in Nigeria was further consulted on relevant disclosures.

# Our structure, operations and supply chain

## Our structure

FrieslandCampina is a public limited liability company fully owned by the cooperative Zuivelcoöperatie FrieslandCampina U.A., with 13,972 dairy farmers in the Netherlands, Belgium, and Germany as members<sup>1</sup>. Through the cooperative, these member dairy farmers collectively own the company<sup>2</sup>.

Our registered office is in Amersfoort, the Netherlands. In 2025, we had a revenue of 13.4 billion euros, with 30 countries of operation<sup>3</sup> (including the United Kingdom and the United States) and 19,075 employees (FTEs).

<sup>1</sup> On 1 January 2026, we merged with Milcobel. On 2 January 2026, we completed the acquisition of Wisconsin Whey Protein in the United States. Further information is provided on page 24 of our Annual Report 2025, available at <https://www.frieslandcampina.com/about-us/financials/financial-and-sustainability-reports/>.

<sup>2</sup> Information about our governance structure as at 31 December 2025 is provided on page 131 of our Annual Report 2025, available at <https://www.frieslandcampina.com/about-us/financials/financial-and-sustainability-reports/>.

<sup>3</sup> An overview of our locations worldwide is available at <https://www.frieslandcampina.com/contact/>.

# FrieslandCampina worldwide

**30** Countries of operation

**>100** Countries with products on the market

**19,075** Employees



**North and South America**  
Growing market for high-quality Dutch cheeses

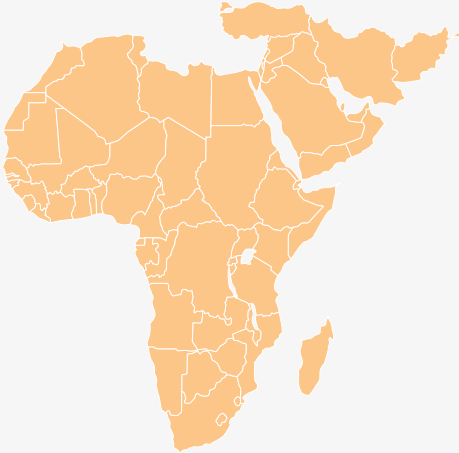
**527**  
**Revenue**  
in millions of euros

**172**  
**Employees**  
average number of FTEs

**Europe**  
Strong local brands, private labels and food service

**7,549**  
**Revenue**  
in millions of euros

**10,963**  
**Employees**  
average number of FTEs



**Africa and the Middle East**  
Increasing demand for affordable dairy products

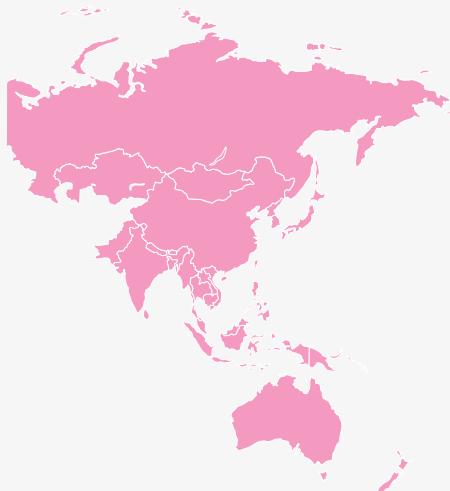
**1,161**  
**Revenue**  
in millions of euros

**860**  
**Employees**  
average number of FTEs

**Asia and Oceania**  
Growing market for high-quality dairy products

**4,156**  
**Revenue**  
in millions of euros

**7,080**  
**Employees**  
average number of FTEs



### Our operations

With our purpose, nourishing by nature, we collect, process and produce:

- consumer products, such as milk, yogurt, cheese, infant nutrition and desserts,
- products for the professional market, such as cream and butter products, and
- ingredients and semi-finished products for the infant nutrition producers, the food industry and the pharmaceutical sector.



Our products are present in the markets of more than 100 countries (including Australia)<sup>4</sup>.

### Our supply chain

Most of the raw dairy we use is sourced from our member dairy farms. We source non-dairy raw materials such as cocoa, edible oil, fruit preparations, flavours and materials for packaging. In addition, we source services such as catering, cleaning, logistics and training.



<sup>4</sup> An overview of our brands is available at <https://www.frieslandcampina.com/brands/>.

# Policies and governance

Caring for people is in our nature. Respecting human rights is embedded in the People pillar of our sustainability framework, alongside the Planet and Nutrition pillars, and grounded in our company values: we act with respect, we aim higher and we succeed together. This intrinsic motivation is reflected in our policies and governance structure.

## Human Rights Policy

Our global Human Rights Policy<sup>5</sup> is part of our code of conduct, Compass<sup>6</sup>. It sets out how we respect internationally recognised human rights in our own operations and the value chain, in line with the UN Guiding Principles on Business and Human Rights (UNGPs)<sup>7</sup> and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct<sup>8</sup>. We are also committed to the International Bill of Human Rights<sup>9</sup> and the International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work<sup>10</sup>.

The policy was adopted by the Executive Board in 2019 and updated in 2025 based on the outcomes of our human rights due diligence, Speak Up process and relevant management systems, and with input from internal personnel and external stakeholders such as workers’ organisations, business partners and NGOs.

We take responsibility for people who might be affected by our value chain activities, such as anyone working at FrieslandCampina, employees of our business partners, local communities and consumers. We aim to apply an inclusive lens that considers specific impacts on different groups, such as children, contingent workers, indigenous peoples, migrants, smallholder farmers and women.

We conduct human rights due diligence and Speak Up process<sup>11</sup>. The Speak Up process enables each of our employees, business partners and all third parties to raise concerns about misconduct, improper behaviour or possible violations of the law or of Compass. The Speak Up-phone and web service are free of charge and available twenty four hours a day, seven days a week, in the languages of the countries in which we operate. It is confidential and secure. The service is hosted by an external independent service provider. Reporters can choose to Speak Up anonymously.

The appendix to the Human Rights Policy specifies our focus areas of human rights, including freedom from child labour and freedom from forced labour.

<sup>5</sup> Our Global Human Rights policy is available at <https://www.frieslandcampina.com/about-us/policies-and-commitments/>.

<sup>6</sup> Our Compass is available at <https://www.frieslandcampina.com/about-us/policies-and-commitments/>.

<sup>7</sup> United Nations Guiding Principles on Business and Human Rights is available at <https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>.

<sup>8</sup> OECD Guidelines for Multinational Enterprises on Responsible Business Conduct is available at [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html).

<sup>9</sup> United Nations International Bill of Human Rights is available at <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>.

<sup>10</sup> ILO Declaration on Fundamental Principles and Rights at Work is available at <https://www.ilo.org/resource/conference-paper/ilo-1998-declaration-fundamental-principles-and-rights-work-and-its-follow>.

<sup>11</sup> Our Speak Up process is available at <https://www.frieslandcampina.com/speak-up/>.

We believe a joint effort is essential. We expect our business partners to also respect the internationally recognised human rights. This expectation is stated in the Business Practices for Business Partners<sup>12</sup> (which all business partners, including suppliers, are required to sign) and, specifically for our suppliers, we require to adhere to the Responsible Supplier Policy<sup>13</sup>, which includes the reference to our Human Rights Policy (see more details below).

To drive implementation, our internal human rights guidelines interpret the policy, including by specifying the indicators of child labour (such as ages and types of work) and forced labour (such as abuse of vulnerability, retention of identity documents and excessive overtime).

**Responsible Supplier Policy**

Our Responsible Supplier policy was adopted by the Executive Board in 2023. Accordingly, we expect our suppliers to:

- where applicable, adhere to our sustainability policies, such as our Human Rights policy and Zero Deforestation and Conversion policy<sup>14</sup>.
- upon request of FrieslandCampina, provide sustainability data and information.
- implement human rights and environmental due diligence as appropriate to the size of their business and value chain, including a grievance mechanism.

This policy is included in the onboarding of new suppliers. In 2025, the policy was signed by key and strategic suppliers. In the coming years, we will continue to get the Responsible Supplier Policy signed by all suppliers.

**Governance<sup>15</sup>**

Our human rights agenda is overseen by the Executive Board (including a seat for the Chief Sustainability Officer) and the Chief People Officer at the most senior level.

The social sustainability team, a multidisciplinary team existing of Human Resources, Ethics & Compliance, Procurement, Supply Chain and Corporate Affairs, designs and executes our global human rights programme. With the team’s support, leadership embeds the respect of human rights into functional- and business operations.

<sup>12</sup> Our Business Practices for Business Partners is available at <https://www.frieslandcampina.com/about-us/policies-and-commitments/>.

<sup>13</sup> Our Responsible Supplier Policy is available at <https://www.frieslandcampina.com/about-us/policies-and-commitments/>.

<sup>14</sup> Our Zero Deforestation and Conversion policy is available at <https://www.frieslandcampina.com/about-us/policies-and-commitments/>.

<sup>15</sup> Information about our general ESG governance in 2025 is provided on page 112 of our Annual Report 2025 available at <https://www.frieslandcampina.com/about-us/financials/financial-and-sustainability-reports/>, and information about our corporate governance in 2025 is provided on pages 127-153.

# Taking action in our operations and supply chain

Since 2021, our employees have been trained on human rights through an e-learning module. It guides on how to identify and report (potential) human rights harms, including case studies on child labour and excessive overtime.

We continuously create awareness of our Speak Up procedure. An overview of why and how to Speak Up is included in the annual Compass workshops. Throughout 2025, we ran an extended global awareness campaign which includes a short, simple yet informative video with subtitles in sixteen different languages and integration of psychological safety into leadership programmes. External transparency includes information on our corporate website and Business Practices for Business Partners.

We were recognised as a top leader (score 9.5 / 10.0) by the Global Child Forum Benchmark 2025, in respecting children's rights across governance & collaboration, workplace, marketplace and community & environment<sup>16</sup>.

## Human rights due diligence in our operations

In 2020, we initiated a process of human rights due diligence in our operations to identify and address human rights risks. The process was in line with the UNGPs and the OECD Due Diligence Guidance for Responsible Business Conduct<sup>17</sup>.

## Risk identification

We began identifying human rights risks by assessing the context and nature of our operations, including input from our regular employee satisfaction survey (Over2You).

Based on that macro risk mapping, we prioritised subsidiaries for in-depth risk assessment. By 2025, this assessment had been conducted in every operating country with a FrieslandCampina employee and followed by mitigating actions. In addition, some production locations have undertaken a Sedex Members Ethical Trade Audit (SMETA)<sup>18</sup>.

Worker feedback constitutes an essential part of our risk assessment and SMETA audit. During each assessment in 2025, we prioritised gathering feedback from potentially vulnerable groups, such as contingent workers, non-management employees, foreigners and women.

In 2025, we evaluated the differences between what we pay employees, the applicable minimum wage levels and the internationally recognised benchmark for living wages, based on employee data and the external benchmarks of Fair Wage Network as per 31 October 2025. The analysis showed that all employees are paid at or above the applicable minimum wage and ensures full compliance.

<sup>16</sup> Global Child Forum Benchmark Report 2025 is available at <https://globalchildforum.org/global-benchmark-report-2025-the-state-of-childrens-rights-and-business/>. Global Child Forum bases its benchmark scores on a company's publicly available information, systematically assessing a corporate's response to impacts on children's rights. Scores are not a measure of actual compliance with policies, outcomes of policies and/or programmes, nor should scores be construed as investment advice. The methodology is available at <https://globalchildforum.org/benchmarks/methodology/>.

<sup>17</sup> OECD Due Diligence Guidance for Responsible Business Conduct is available at [https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-business-conduct\\_15f5f4b3-en.html](https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-business-conduct_15f5f4b3-en.html).

<sup>18</sup> Sedex Members Ethical Trade Audit (SMETA), see <https://www.sedex.com/solutions/smeta-audit/>.

**Key findings**

Out of the assessments, risks faced by non-desk contingent workers in lower income or unstable economy remain a heightened concern. In the context of restructuring, work-life balance, biased treatment and employment security were identified as potential risks.

**Mitigating actions**

We align the findings and improvement plans with local management to integrate it into business operations.

Looking ahead, we have developed a long-term Human Rights Plan. For our operations, that includes priorities on striving for living wages, fair working time, fair representation of workers’ interests, further support for victims of discrimination, violence or harassment, and equality between FrieslandCampina employees and contingent workers. Engaging consistently with workers and their representatives will remain central to our actions.

**Human rights risk management in our supply chain**

Since 2023, our procurement personnel are trained on endorsing the relevance of our Responsible Supplier Policy (including human rights) towards suppliers.

**Dairy sourcing**

We are a member of the Dairy Sustainability Framework<sup>19</sup>, which aims at a universal approach to make the sector and dairy products more sustainable (including modern slavery-related aspects).

With Dairy Development activities<sup>20</sup>, we work with dairy farmers in Pakistan, Nigeria, Indonesia, Malaysia, Vietnam, Thailand, Romania, Greece, Hungary, Ivory Coast, and the Philippines. This creates more stable living conditions for local dairy farmers. In nine of these countries, the local milk is collected and processed for local markets.

In Nigeria, the Fund against Child Labour (Fonds Bestrijding Kinderarbeid)<sup>21</sup> project continues with interventions to mitigate risks to children, advocacy for access to formal education, and awareness campaigns in communities. This project is expected to conclude in 2026.

Looking ahead, our Human Rights Plan aims to further engage with local dairy farmers, identify their needs and structure our actions as risk-based.

<sup>19</sup> Dairy Sustainability Framework, see <https://www.dairysustainabilityframework.org/>.  
<sup>20</sup> More information about our Dairy Development activities is available at <https://www.frieslandcampina.com/sustainability/people/dairy-development/>.  
<sup>21</sup> Fund against Child Labour (Fonds Bestrijding Kinderarbeid), see <https://english.rvo.nl/subsidies-financing/fbk>.

## Non-dairy agricultural raw material sourcing

We strive to source all our non-dairy agricultural raw materials as respecting people and planet. We have mapped human rights and environmental risks across selected materials by desktop research, including child labour prevalence data from United Nations International Children’s Emergency Fund (UNICEF). Based on that, we prioritise materials such as palm oil and cocoa for in-depth assessments.

In addition to applicable legislation, we adhere to the guidelines of the following institutes:<sup>22</sup>

<i>Raw material</i>	<i>Institute</i>
Palm oil	Roundtable on Sustainable Palm Oil (RSPO) <sup>23</sup>
Cocoa	Rainforest Alliance <sup>24</sup>
Soy	Round Table on Sustainable Soy (RTRS) credits <sup>25</sup>
Cane sugar	Bonsucro or VIVE <sup>26</sup>
Paper & Pulp	FSC / PEFC <sup>27</sup>

<sup>22</sup> More information about our responsible sourcing is available at <https://www.frieslandcampina.com/sustainability/planet/responsible-sourcing/>.

<sup>23</sup> Roundtable on Sustainable Palm Oil (RSPO), see <https://rspo.org/>.

<sup>24</sup> Rainforest Alliance, see <https://www.rainforest-alliance.org/>.

<sup>25</sup> Round Table on Sustainable Soy (RTRS), see <https://responsiblesoy.org/?lang=en>.

<sup>26</sup> Bonsucro, see <https://bonsucro.com/>; VIVE, see <https://www.viveprogramme.com/>.

<sup>27</sup> FSC, see <https://fsc.org/en/>; PEFC, see <https://www.pefc.co.uk/>.

<sup>28</sup> Dutch Initiative on Sustainable Cocoa (DISCO), see <https://www.idhsustainabletrade.com/initiative/dutch-initiative-on-sustainable-cocoa-disco/>.

In 2025, we received some cases raised by NGOs and customers. With all cases, we took action to investigate with our suppliers and certification bodies.

To collect more insights into the upstream and increase our leverage, we maintain partnerships:

- We are a member of the Dutch Initiative on Sustainable Cocoa (DISCO) , a public-private.
- partnership focused on improving the living conditions of cocoa farmers and their families. We source cocoa through supplier-led programmes that support living income and child labour prevention. Key initiatives include Cargill Cocoa Promise and Olam’s AtSource. The size of these sustainable cocoa supplier programmes is disclosed in the table for the breakdown by cocoa certificates, under Mass Balance + Monitoring.
- Since 2024, we partner with Earthworm Foundation, to improve the transparency in our palm oil supply chain and mitigate risks on deforestation and human rights.
- Since 2024, we work with EcoVadis to engage with suppliers and better manage sustainability risks in sourcing.
- Over the past three years, FrieslandCampina as part of the “Coconut Alliance for the Sustainable Coconut Production in the Philippines” together with GiZ, Barry Callebaut, Cargill, JDE Peet’s, Nestlé, Procter & Gamble and Unilever have collaborated on sustainable coconut production (including contribution to the living income of smallholder coconut farmers) and the improved traceability of coconuts from the Philippines.

In 2026, we will intensify collaboration with our suppliers to further improve the traceability of key materials. Our Human Rights Plan outlines priorities and actions to improve commodity-based human rights and environmental risk mapping and review the approach to sourcing commodities with higher risk to people and planet.

## Effectiveness

In 2025, we applied the two key quantitative indicators:

- 92 percent of the assigned employees completed the human rights e-learning (2024: 91 percent).
- 0 Speak Up case related to human rights were reported (2024: 0).

In addition, we track the number of local dairy farmers trained in Dairy Development countries<sup>29</sup>. For non-dairy agricultural raw material sourcing, our sustainable sourcing and traceability activities are audited annually and reported in our Annual Report<sup>30</sup>.

<sup>29</sup> More information is provided on page 108 of our Annual Report 2025 available at <https://www.frieslandcampina.com/about-us/financials/financial-and-sustainability-reports/>.

<sup>30</sup> More information is provided on pages 74-75 of our Annual Report 2025 available at <https://www.frieslandcampina.com/about-us/financials/financial-and-sustainability-reports/>.

Signed by:

**Jan Derck (J.D.) van Karnebeek**

Chief Executive Officer

Royal FrieslandCampina N.V.

**Hans (J.G.) Janssen**

Chief Financial Officer

Royal FrieslandCampina N.V.

This statement was approved by the Executive Board of Royal FrieslandCampina N.V. on 20 April 2026.

[www.frieslandcampina.com](http://www.frieslandcampina.com)