

## KnowTheChain 2023 Food & Beverage Benchmark

### Additional Disclosure

Company Name: Moncler

Date: 15 September 2023

Guidance:

- Please add any additional information you wish to provide under the relevant indicator elements below.
- We welcome examples of leading practices.
- Unless you are sharing leading practices, please limit the information to indicators for which KnowTheChain could not yet identify sufficient information on your website.
- Note **KnowTheChain has already undertaken a review of your website**. Should you wish to include links to existing disclosure, please specify the page number / section you are referring to.

#### INDICATOR 1: SUPPLIER CODE OF CONDUCT AND CAPACITY BUILDING

1.1 has a supplier code of conduct that requires suppliers to respect the ILO core labour standards, which include the elimination of forced labour; and requires suppliers to cascade/implement standards that are in line with the company's supplier code of conduct; and

1) Please note that, as required, the Moncler Group has a supplier code of conduct that requires suppliers to respect the ILO core labour standards (please refer to page 2 of Moncler Group's Supplier Code of Conduct), and which includes the elimination of forced labour; and requires suppliers to cascade/implement standards that are in line with the company's supply code of conduct. Therefore we believe that the score for this requirement should be 100.

Moreover, please also refer to the new Human Rights Policy, which is integral part of Moncler Group's Code of Ethics and the Group's Supplier Code of Conduct; there are other references in the Policy to the commitment to respect the ILO core labour standards, and more details regarding the commitments to the elimination of forced labour. In the Policy it is reported that all suppliers and business partners must carefully read, understand and adhere to the principles and rules of conduct contained in this Policy.

1.2 engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labour to their own supply chains and/or trains suppliers below the first tier on such policies, and measures the effectiveness of capacity building.

2) Please note that in 2022 the web portal dedicated to suppliers was enhanced with a specific training course on the Code of Ethics; the training course includes an ad hoc section on human rights principles and must be completed by all suppliers who register on the portal. Moreover, in 2022 the Group has launched an important collaboration with the International Training Centre of the International Labour Organisation (ITCILO) to develop ad hoc training and information courses on human rights issues for both suppliers and employees of Moncler and Stone Island. The course has been shared with all suppliers in 2023 and it is a clear example of a capacity building initiative aimed at enabling suppliers to fully understand the principles of respect for human rights contained in the

Group's Codes and Policies and to cascade its supply chain policies that address forced labour to their own supply chains.

The effectiveness of these capacity building initiatives is then verified by the Group through its periodic supplier audits, which aim to verify the level of supplier compliance with the principles defined in the Group's Codes and Policies and to monitor their improvement over time as a result of agreed mitigation actions and capacity building activities.

Please also note that, as it is reported in the Group's Supplier Code of Conduct, "Suppliers act as guarantors for the compliance with the Supplier Code of Conduct by their Subcontractors."

Therefore, during audit inspections the Group verifies that its Suppliers monitor the Subcontractors by requesting, among other things, evidence of their signing of the Code of Conduct.

#### **UPDATED SOURCES:**

- Human Rights Policy (<https://d2jb2t40p81ydg.cloudfront.net/wp-content/uploads/2016/07/Moncler-Human-Rights-Policy-1.pdf>)

- MSA 2022 (California and UK)

(CALIFORNIA:<https://d2jb2t40p81ydg.cloudfront.net/wp-content/uploads/2023/07/Moncler-USA-2022-California-Modern-Slavery-Statement-ENG-signed.pdf>) (UK:

<https://d2jb2t40p81ydg.cloudfront.net/wp-content/uploads/2023/07/Moncler-UK-2022-UK-Modern-Slavery-Statement-ITA-signed.pdf>)

- 2022 Consolidated Non Financial Statement (in particular pages 95-104)

(<https://d2jb2t40p81ydg.cloudfront.net/wp-content/uploads/2023/06/Consolidated-Non-Financial-Statement-2022.pdf>)

- Updated sustainability section of the Group's website

(<https://www.monclergroup.com/en/sustainability/be-fair/responsible-sourcing>)

(<https://www.monclergroup.com/en/sustainability/be-fair/dialogue-to-grow-together>)

#### **INDICATOR 2: MANAGEMENT AND ACCOUNTABILITY**

2.1 has a committee, team, program, or officer responsible for the implementation of its supply chain policies that address forced labour; and discloses how incentives for staff (e.g. bonuses, part of employee performance reviews) are tied to improvements in working conditions in supply chains;

1) Please note that further details regarding the responsibility for the implementation of the supply chain strategy are reported in the updated sustainability section of the Group's website. In particular it is reported that "the Group has defined a governance system aimed at guaranteeing harmonization between the sustainability strategy for the supply chain and the Group's purchasing practices. Above all, a Control, Risk and Sustainability Committee has been established at Board level which is entrusted by the Board of Directors with supervising the implementation of all sustainability practices, including responsible sourcing with all related activities included into Group's program defined for suppliers on sustainability topics. This committee acts with the support of various corporate functions (including the Sustainability Unit and the Operation Team) that have operational responsibility for carrying out the various activities, for each area of responsibility, within the program".

Please also note that the implementation of the supply chain policies that address forced labor is not limited to the management of the projects included in the Pillar Be Fair of Moncler Group

Sustainability Plan as reported in the Comment section; the main activities in this area are described in the Responsible sourcing chapter of the 2022 Consolidated Non-Financial Statement (pages 95-104) and also include, for example, the periodic social and environmental audits that the Group conducts on all suppliers.

Finally, please note that, as it is reported at the weblink

<https://www.monclergroup.com/en/sustainability/nurture-uniqueness/management-and-development>,

"In the MBO system, for all those involved in the implementation of the Sustainability Plan are assigned social or environmental objectives as well as internal population engagement objectives. All members of the Strategic Committee (Moncler Group internal committee), including the Chairman and the Chief Executive Officer, have a percentage of their MBO linked to the achievement of the Group's strategic sustainability objectives and a target relating to the DE&I topic. Moreover, all managers involved in achieving the targets defined within the Group's Sustainability Plan have their MBO linked to the fulfilment of results useful for attaining those targets. ". Targets like "At least 80% of critical suppliers aligned with the highest levels of the Moncler Group's social compliance standard by 2025" are included in the Group's Sustainability Plan and are clearly linked to improvements in working conditions in supply chains.

2.2 discloses how it trains relevant decision-makers within the company on risks and policies that address forced labour; and

2) Please note that in the updated sustainability section of the Group's website (section Responsible sourcing) it is reported that "the purchasing practices are periodically reviewed and updated, and all Group's employees involved in their implementation (both buyers and other employees who are in contact with suppliers) are trained on their proper application and on the principles of sustainability and responsibility most relevant to their work (in particular, for example, a specific training course on the principles of the Code of Ethics and a training course on Human Rights are provided)". It is a clear description on how the Group trains relevant decision-makers within the Group on risks and policies that address forced labour.

2.3 has tasked a board member or board committee with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions.

3) Please note that further details regarding the responsibility for the oversight of the supply chain strategy are reported in the updated sustainability section of the Group's website. In particular it is reported that

"the Group has defined a governance system aimed at guaranteeing harmonization between the sustainability strategy for the supply chain and the Group's purchasing practices. Above all, a Control, Risk and Sustainability Committee has been established at Board level which is entrusted by the Board of Directors with supervising the implementation of all sustainability practices, including responsible sourcing with all related activities included into Group's program defined for suppliers on sustainability topics. This committee acts with the support of various corporate functions (including the Sustainability Unit and the Operation Team) that have operational responsibility for carrying out the various activities, for each area of responsibility, within the program."

In addition please also refer to the new Human rights Policy, where it is reported that "This Policy is reviewed and updated periodically according to the results of risk assessments, in accordance with international best practice, of the evaluations of the Control, Risk and Sustainability Committee, as well as on the basis of dialogue with internal and external stakeholders. The Policy was approved by the Board of Directors on 28th February 2023".

**UPDATED SOURCES:**

- Human Rights Policy (<https://d2jb2t40p81ydg.cloudfront.net/wp-content/uploads/2016/07/Moncler-Human-Rights-Policy-1.pdf>)

- MSA 2022 (California and UK)

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(<https://www.monclergroup.com/en/sustainability/be-fair/dialogue-to-grow-together>)

**INDICATOR 3: TRACEABILITY AND SUPPLY CHAIN TRANSPARENCY**

3.1 the names and addresses of first-tier suppliers;

3.2 the names and locations of below-first-tier suppliers (this does not include raw material suppliers); and

3.3 the sourcing countries of at least three raw materials at high risk of forced labour.

**INDICATOR 4: RISK ASSESSMENT**

4.1 details on how it conducts human rights supply chain risk or impact assessments that include forced labour risks or assessments that focus specifically on forced labour risks, including through engaging with relevant stakeholders (such as civil society, unions, and workers or their representatives) in countries in which its suppliers operate;

1) Please note that further details regarding how the Group conducts human rights supply chain risk are reported in the new Human Rights Policy, page 8, where it is disclosed that "The Group's commitment to ensure the respect for human rights begins with the timely and prior identification of actual and potential risks of infringement of these rights. Risk analysis is performed through different tools on all entities involved in the value chain: internal activities and all Moncler Group's

corporate sites, current and potential business partnerships (e.g. mergers or acquisitions), suppliers, sub-contractors and their employees, including women, children, indigenous people and local communities, in any way connected or impacted - directly or indirectly - by the Group's activities. The identification of potential risks is performed and updated periodically, in order to ensure constant compliance or, where necessary, intervention actions, and to guarantee that all the potential and actual new risks are identified. Based on an assessment of the actual or potential risk of human rights violations that may result from its activities or those of its partners, the Moncler Group has established specific due diligence processes to improve the effectiveness of its actions, aimed at preventing and mitigating negative impacts, both at its corporate sites and along the supply chain."

Moreover, please also refer to the 2022 Consolidated Non Financial Statement, where it is reported that "

The Group is careful to promptly identify critical situations that could cause potential supply disruptions and mitigate the related risk. The Group periodically identifies its critical suppliers to involve them in targeted actions and initiatives. This identification process is based on a risk-based approach that takes into account, in addition to their importance to the Group in terms of the economic value of the orders commissioned, quality, delivery times, financial dependence of the supplier, and the Group's ability to ensure the supply of goods and services if it has to replace a supplier quickly, and specific sustainability parameters, such as: the potential risk relating to human rights in the reference country, the sourcing of key raw materials with potential social and environmental impacts and the supply of strategic processes for the Group, with a particular focus on raw materials of animal origin and on the relevance to the business. Finally, since 2022, a screening is conducted by qualified, experienced third parties to identify possible cases or signs of conflict of interest on all Group suppliers, including critical suppliers."

**UPDATED SOURCES:**

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4.2 details on forced labour risks identified in different tiers of its supply chains; and

4.3 how it has consulted with relevant stakeholders (such as civil society, unions, and workers or their representatives) in steps taken to address the risks identified.

**INDICATOR 5: DATA ON SUPPLY CHAIN RISKS**

5.1 the percentage or number of supply chain workers who are women;

1) and 2) Please refer to the updated sustainability section of the Group's website (section Supply chain profile) where it is reported that "As of today, the majority of the Group's critical supplier workers are women (around 68%) and the percentage of migrant workers is around 5% of the workforce." An analysis conducted on the supply chains of critical suppliers, which account for a significant share of the Group's value of orders, showed that the majority of the Group's supplier workers are women (around 68%) and that the percentage of migrant workers at Group's suppliers is around 5% of the workforce. Based on these analyses and other risk assessments, the Group structured its human rights due diligence approach to take into account the specific needs and issues of these particularly relevant categories of workers in its supply chain.

**UPDATED SOURCES:**

- Updated sustainability section of the Group's website  
(<https://www.monclergroup.com/en/sustainability/be-fair/supply-chain-profile>)

5.2 the percentage or number of supply chain workers who are migrant workers' and

5.3 the percentage or number of supply chain workers that are being paid a living wage.

**INDICATOR 6: PURCHASING PRACTICES**

6.1 commits to responsible buying practices in its contracts with suppliers;

6.2 describes how it has adopted responsible purchasing practices in the first tier of its supply chains, which includes planning and forecasting, and how it ring-fences labour costs; and

6.3 discloses two quantitative data points demonstrating that it has responsible purchasing practices in place that address the risk of forced labour.

**INDICATOR 7: RECRUITMENT-RELATED FEES**

7.1 requires that no worker in its supply chains should pay for a job—the costs of recruitment-related fees should be borne not by the worker but by the employer ("Employer Pays Principle");

1) Please refer to the new Human Rights Policy (par. Prohibition of any form of forced and compulsory labour, and of human trafficking), where it is reported that "The Moncler Group rejects all forms of forced, compulsory labour; **work performed under the constraint of debt repayment**, servitude and human trafficking; modern slavery; and any type of work performed under conditions of psychological and/or physical coercion. **Workers must not be forced to deposit personal documents, money, or guarantees.**". These principles (and the fact that the Group requires that they must be followed by all suppliers) imply that the Group requires that no worker in its supply chains should pay for a job.

7.2 provides detail on the implementation of the Employer Pays Principle in its supply chains by demonstrating how it works to prevent the charging of fees to supply chain workers in different supply chain contexts; and

2) Compliance with all the principles that the Group is committed to upholding and that are present in the Policy are verified through the due diligence described in the Policy itself (pages 8-10); the main and most relevant verification step for the supply chain is the on-site audit activity that the Group is committed to conduct periodically at all suppliers. In particular, in the case of the employer pays principle, this is verified during audits through interviews with employees that are conducted so that management does not participate and does not know which employees participated. Another relevant mechanism that the Group has implemented to prevent the charging of fees to supply chain workers is the creation and making available to all suppliers of the human rights training course prepared with the support of ILO and in which these issues are also covered. These details are not publicly disclosed but are implicit in the description of the Group's careful due diligence that affects all the social and environmental principles that the Group sets out in its Codes and Policies; it would not be possible or make sense to make disclosure of the details of how the Group verifies compliance with each individual principle.

7.3 in the event that it discovers that fees have been paid by workers in its supply chains, provides evidence of re-payment of recruitment-related fees to workers. The company describes how it engages with affected workers in the remediation process.

3) Again, the "Remedy of human rights violations" section of the new Policy (page 9) details how the Group is committed to handling cases of evidence of violation of any of the principles addressed in the Policy (thus including the Employer Pays Principle) emerged in the value chain; it would not make sense to detail each principle individually. Specifically, the Policy states that "Should any breaches of the human rights principles set out in this Policy occur, the Group is committed to implementing appropriate processes to remedy any negative impacts on workers, clients and communities it may have caused, either directly and indirectly. The Moncler Group is also committed to collaborate with competent national and international entities and institutions, as well as with its suppliers and partners, to ensure the adequate resolution of those issues. Furthermore, the Group also expects its suppliers and business partners to take responsibility for implementing appropriate processes to mitigate and remedy any negative impact resulting from a human rights violation incurred in the performance of their activities. With respect to its supply chain, the violation of the principles set forth in this Policy, outlined in the Code of Ethics and the Supplier Code of Conduct, constitutes a breach of contract and may result in targeted intervention actions, application of penalties, and the termination of the contract. Where less serious violations are concerned, the Group supports its suppliers in achieving greater awareness and requires the implementation of corrective plans within the established deadlines and whose implementation will be assessed through dedicated audits. As regards internal operations, the Group undertakes to promptly analyse all reports collected through internal controls, surveys, or whistleblowing channels, possibly requiring the support of external consultants. In relation to the seriousness of the incident, immediate measures are put in place, up to termination of the contract with the employee, or with the collaborator if found to have behaved inappropriately"

**UPDATED SOURCES:**

- Human Rights Policy (<https://d2jb2t40p81ydg.cloudfront.net/wp-content/uploads/2016/07/Moncler-Human-Rights-Policy-1.pdf>)

## INDICATOR 8: RESPONSIBLE RECRUITMENT

8.1 discloses information on the recruitment agencies used by its suppliers; and

8.2 provides details of how it supports responsible recruitment in its supply chains (e.g. by collaborating with relevant stakeholders to engage policy makers to strengthen recruitment standards).

## INDICATOR 9: FREEDOM OF ASSOCIATION

9.1 works with independent local or global trade unions and/or other legitimate worker representatives to improve freedom of association in its supply chains;

9.2 discloses that it is party to a global framework agreement that covers its supply chains and/or an enforceable supply chain labour rights agreement with trade unions or worker organisations; and

9.3 discloses the percentage of supply chains covered by collective bargaining agreements.

## INDICATOR 10: GRIEVANCE MECHANISM

10.1 takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labour conditions in the company's supply chains is available to its suppliers' workers and their legitimate representatives across supply chain tiers; and

1) The "Grievance Mechanisms" section (pages 10-11) of the new Human Rights Policy now clarifies that the mechanism is open to all workers and their legitimate representatives and that it is available also below the first tier. Indeed, the Policy states: "Anyone who is aware of an actual or suspected violation of the applicable law, or principles of the Policy, must report it promptly. These situations include breaches by employees, consultants, partners, agents, suppliers, or anyone acting on behalf of the Group or of a Group supplier."

10.2 discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved; and

2) Please note that a detailed disclosure about the number of grievances filed, addressed, and resolved is publicly reported each year in the Consolidated Non-Financial Statement; in particular, please refer to page 30 of the 2022 Consolidated Non-Financial Statement, where it is reported that "During the year, although no significant reports were received through the whistleblowing system, 13 reports were received through communications addressed to the Human Resources department



regarding potential violations of the Code of Ethics that upon investigation were determined to be actual violations of the Code of Ethics: three cases of internal theft of certain products from stores, nine cases of inappropriate behaviour towards colleagues or customers and one of discriminatory behaviour. In five cases, the employment relationship was terminated and, in the others, disciplinary actions were implemented."

10.3 takes steps to ensure that its suppliers' workers or their legitimate representatives are involved in the design and/or performance of the mechanism, to ensure that the workers trust the mechanism.

3) The Group has taken concrete steps to ensure that the workers trust the mechanism. These include conducting on-site audits at suppliers (the Group is committed to conducting periodic audits at all suppliers) in which, among other things, both the presence of internal grievance mechanisms within the company and the availability to workers of the Group's Code of Ethics (in which the ways in which reports can be made safely and anonymously are described) are verified. In addition, the training course that the Group has prepared with the support of ILO and that is made available to all suppliers also describes how workers can make reports of possible violations of the principles of the Codes and Policies in a safe and anonymous manner.

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**INDICATOR 11: MONITORING**

11.1 its methodology for monitoring the implementation of its supply chain policies addressing forced labour;

11.2 the findings of monitoring reports, including details regarding any violations revealed in relation to forced labour and indicators of forced labour, across supply chain tiers; and

11.3 the use of worker-driven monitoring (i.e., monitoring undertaken by independent organisations that includes worker participation and is guided by workers' rights and priorities).

**INDICATOR 12: REMEDY AND RESPONSE TO ALLEGATIONS**

A(1) a process for responding to potential complaints and/or reported violations of policies that address forced labour and how it engages affected stakeholders as part of this process; and

1) Please note that further details on the handling of reports received through grievance systems are described in the "Code of Ethics" section of the Moncler Group website, where it is reported that "once a report has been received through whistleblowing channels the Head of Internal Audit receives and promptly analyses all the information; Depending on the type of alleged violation, the Head of Internal Audit is responsible for sharing the report with any directly interested functions; in particular, in the case of alleged violations in the area of discrimination and harassment, they are shared and handled with the Human Resource function of the relevant region. If the issue raised is very serious or complex, the Head of Internal Audit has the task of starting an immediate investigation, also requesting the support of other corporate functions, including Legal, Human Resources, ICT and Sustainability, as well as competent external consultants, in order to conduct investigations and controls aimed at understanding what happened. Where appropriate in relation to the seriousness of the incident, immediate measures are put in place, up to termination of the contract with the employee."

Moreover, please refer to the chapter "Remedy of human rights violations" of the new Human Rights Policy (page 9) where the Group detailed the process for responding to potential complaints and/or reported violations of policies that address forced labour and how it engages affected stakeholders as part of this process; in particular, the Policy states that

"Should any breaches of the human rights principles set out in this Policy occur, the Group is committed to implementing appropriate processes to remedy any negative impacts on workers, clients and communities it may have caused, either directly and indirectly. The Moncler Group is also committed to collaborate with competent national and international entities and institutions, as well as with its suppliers and partners, to ensure the adequate resolution of those issues. Furthermore, the Group also expects its suppliers and business partners to take responsibility for implementing appropriate processes to mitigate and remedy any negative impact resulting from a human rights violation incurred in the performance of their activities. With respect to its supply chain, the violation of the principles set forth in this Policy, outlined in the Code of Ethics and the Supplier Code of Conduct, constitutes a breach of contract and may result in targeted intervention actions, application of penalties, and the termination of the contract. Where less serious violations are concerned, the Group supports its suppliers in achieving greater awareness and requires the implementation of corrective plans within the established deadlines and whose implementation will be assessed through dedicated audits. As regards internal operations, the Group undertakes to promptly analyse all reports collected through internal controls, surveys, or whistleblowing channels, possibly requiring the support of external consultants. In relation to the seriousness of the incident, immediate measures are put in place, up to termination of the contract with the employee, or with the collaborator if found to have behaved inappropriately".

**UPDATED SOURCES:**

- Human Rights Policy (<https://d2jb2t40p81ydg.cloudfront.net/wp-content/uploads/2016/07/Moncler-Human-Rights-Policy-1.pdf>)

- Updated sustainability section of the Group's website (<https://www.monclergroup.com/en/governance/governance-and-ethics/governance-model#code-of-ethics>)

A(2) at least two examples of outcomes of its remedy process in practice, covering different supply chain contexts, for its suppliers' workers.

In addition, where an allegation is identified in a company's supply chains:

B.1.1 that it engages in a dialogue with the stakeholders reportedly affected in the allegation(s)

B.1.2 outcomes of the remedy process in the case of the allegation(s); and

B.1.3 evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.

Where an allegation is identified in the company's supply chains, but is denied by the company:

B.2.1 a description of what actions it would take to prevent and remediate the alleged impacts; and

B.2.2 as part of this process, it would engage with affected stakeholders and their representatives.

## NON-SCORED RESEARCH

### Reporting Legislations

UK Modern Slavery Act: Where applicable, the company discloses at least one statement under the UK Modern Slavery Act.

Yes/No. Please provide link to a publicly available statement.

California Transparency in Supply Chains Act: Where applicable, the company has a disclosure under the California Transparency in Supply Chains Act.

Yes/No. Please provide link to a publicly available statement.

Australia Modern Slavery Act: Where applicable, the company discloses at least one statement under the Australia Modern Slavery Act.

Yes/No. Please provide link to a publicly available statement.

### High Risk Sourcing

*Please indicate whether your company sources any of the below high-risk commodities. Note where a company does not provide this information, KnowTheChain will review the company's website as well as third party sources to identify relevant information.*

- Beans (green, soy, yellow)
- Brazil Nuts/Chestnuts
- Cattle
- Chile Peppers
- Cocoa
- Coffee
- Corn
- Fish
- Oil (palm)
- Peanuts
- Rice
- Sesame

- Shrimp
- Sugarcane
- Tomatoes
- Wheat