

MODERN SLAVERY ACT 2015 (UK)

SLAVERY AND HUMAN TRAFFICKING STATEMENT LOTUS BAKERIES UK ENTITIES

26th March 2024

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps that Lotus Bakeries NV's UK subsidiaries have taken during the year ending 31 December 2023, and what steps we are looking to take going forward, to seek to prevent modern slavery and human trafficking in its business and supply chain.

The UK subsidiary companies covered by this statement are:

- Lotus Bakeries UK Ltd
- Natural Balance Foods Ltd
- Urban Fresh Foods Ltd
- The Kids Food Company Ltd
- Peter's Yard Wholesale Ltd

Organisation structure and supply chain

Lotus Bakeries, founded in 1932, operates worldwide in the indulgent and natural snacking segment with brands including Lotus[®], Biscoff[®], nākd[®], TREK[®], BEAR[®], Kiddylicious[®], Peter's Yard[®], Dinosaurus[®], Peijnenburg[®] and Annas[®].

Headquartered in Belgium, Lotus Bakeries is a dynamic and internationally oriented company with production facilities in Belgium, the Netherlands, France, Sweden, South Africa and the United States, and a production facility that is currently under construction in Thailand that will be operational in the first half of 2026.

Lotus Bakeries has 23 own sales organizations in Europe, America, Asia and Australia. Lotus Bakeries also works with commercial partners in approximately fifty countries worldwide. It builds long-term partnerships with its suppliers, distributors and customers alike, and supplies products for retail (traditional and online), foodservice, airlines, duty free and wholesale.

On 31 December 2023, Lotus Bakeries had 2,984 employees. It achieved a revenue of EUR 1,063.0 million in 2023. The shares of Lotus Bakeries are listed on Euronext Brussels. The majority of shares are owned by the Boone and Stevens family.

Governance

Lotus Bakeries' commitment to eradicating modern slavery within the UK subsidiaries is the responsibility of the General Managers of each of the entities, under the supervision of the Group Executive Committee.

Further, the General Managers report at least annually to the Board of Directors. Where matters exceed local level, the General Manager will report to the Group Executive Committee, who would in turn seek counsel from the Group Audit & Sustainability Committee on issues related to modern slavery.

Our Policies on slavery and human trafficking

Lotus Bakeries actively assumes its social responsibility. We are committed to ensuring ethical business practices throughout the organization and its supply chain.

Upholding business integrity and human rights is fundamental to building trust with our partners, communities and stakeholders, as pointed out in our Human Rights Policy. Our guiding principle is to abide by the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business & Human Rights. Where local law and international standards are higher, Lotus Bakeries will follow the higher standard wherever possible.

The Code of Conduct was approved by the Board of Directors on 2 April 2020 and was implemented in 2020. As of 2021, every new employee who is recruited must sign it. This Code forms an integral part of the employment contract. Lotus Bakeries expects all its employees to act with integrity, honesty and fairness and in full compliance with the applicable laws, rules and regulations. It's Code of Conduct contains six main principles that its employees must respect at all times. These principles are further elaborated on in separate more detailed policies and procedures. The full Code of Conduct is available in 11 different languages on our website: <https://www.lotusbakeries.com/governance-practices-and-policies> . The Code of Conduct reflects our zero-tolerance approach to the practices of child labour, forced or involuntary labour, debt bondage, bonded labour or modern slavery.

Lotus Bakeries further developed and rolled-out a human rights policy in 2023, which applies to all our operations and to all full-time, part-time, and temporary colleagues who are directly employed by Lotus Bakeries, including our directors and officers. The policy also extends to any subsidiaries or joint ventures where Lotus Bakeries has a majority interest or management control. The full Human Rights Policy as well as our Modern Slavery Statement are available on our website: <https://www.lotusbakeries.com/governance-practices-and-policies> .

We expect our suppliers of packaging, raw materials, equipment and finished products to meet the principles set out in the Lotus Bakeries' Code of Conduct. The Supplier Code of Conduct was implemented in 2020, is supplied in the language of the contract and is available in 11 languages. The current suppliers of packaging, raw materials, equipment and finished products with which Lotus Bakeries has a framework contract, were asked to sign the Code of Conduct separately at the time. Since then, we have included this Code within standard contracts with our key suppliers. In 2023, 94.2% of our key suppliers of finished products (external production), raw materials, packaging and machinery with which Lotus Bakeries has concluded a written contract had signed the Supplier Code of Conduct. Moreover, all our general purchase conditions contain a reference to the Supplier Code of Conduct, which is available on our website: <https://www.lotusbakeries.com/governance-practices-and-policies> .

All employees of Lotus Bakeries - as well as all our suppliers - are encouraged to speak up if they encounter any conduct that concerns them, or that seems to violate Lotus Bakeries Code of Conduct, our policies or applicable laws and regulations, including perceived violations relating to human rights and modern slavery. In 2023, Lotus Bakeries issued a new whistleblowing line which can be accessed by anyone on our website (<https://www.lotusbakeries.com/governance-practices-and-policies>) and through which anonymous reporting is possible, confidentiality is assured, and accurate follow-up of the legal obligations is guaranteed. Lotus Bakeries greatly values the help of employees and others who identify and speak up about potential concerns that need to be addressed. People who speak up are protected and will not suffer for raising concerns in good faith about suspected misconduct. Lotus Bakeries has developed a Whistleblowing Policy which explains how one can raise concerns about

suspected misconduct in confidence and without fear of retaliation. It also describes how such concerns are treated. The Whistleblowing Policy can be found on our website: <https://www.lotusbakeries.com/governance-practices-and-policies> .

Due Diligence Processes for slavery and human trafficking

The Supplier Code of Conduct includes an obligation for the supplier to provide documentation that Lotus Bakeries can use as a basis for verifying compliance with the Supplier Code of Conduct.

While audits at suppliers have traditionally focused on quality and food safety, Lotus Bakeries is exploring ways to monitor the proper enforcement of other principles in the Code of Conduct. Efforts are being made to integrate these considerations into existing audits.

Lotus Bakeries expects suppliers to take corrective actions necessary to address any identified gaps.

Risk assessment and management

Lotus Bakeries has implemented a continuous risk management process aimed at ensuring that risks are identified, assessed, prioritised, controlled and monitored in such a way that they can be kept at an acceptable level. The risk management process is aligned with the implementation of the strategic, operational and financial objectives of Lotus Bakeries. The entire risk management process is based on the COSO Enterprise Risk Management framework.

The enterprise risk management of Lotus Bakeries consists of the following key components:

- Risk identification: this involves identifying the sources of risk that could impact the Lotus Bakeries Group.
- Risk assessment: once risks have been identified, it is important to assess their impact and likelihood of occurrence. This helps to prioritise the most critical risks and determine the appropriate response.
- Risk mitigation: after risks have been identified and assessed, strategies are developed to mitigate or manage those risks. This may include implementing process improvements, implementing controls, or transferring risk through insurance.
- Risk monitoring: ongoing monitoring of risks is critical to ensure that the Lotus Bakeries Group is prepared for potential threats and to assess the effectiveness of risk mitigation strategies.
- Communication and training: effective communication and training are essential for an ERM program to be successful. All employees should understand their role in identifying and managing risk and should be trained on how to do so.

On a periodic basis, risks are assessed, monitored and adjusted by the Group Executive Committee. The risk management matrix defined is discussed with and reported to the Group Audit & Sustainability Committee.

For each of the principal risks identified, a risk owner has been appointed who ensures a concrete action plan to mitigate the potential impact of the risks throughout the Lotus Bakeries Group. The risk owner is also responsible for the follow-up of the defined actions. The results are reported periodically to the Group Audit & Sustainability Committee.

One of the principal risks considered is compliance with laws, regulations and ethical standards throughout the global jurisdictions in which Lotus Bakeries operates, including human rights and modern slavery.

Key performance indicators to measure effectiveness of stems being taken

If we discover an indicator of forced labour or human rights abuse, we will respond in a manner proportionate to the nature and extent of the situation. Serious incidents will require immediate and decisive action and may result in the termination of the employment or business relationship. For less serious incidents, we will allow reasonable time for remediation.

There were no indicators of forced labour, slavery or human trafficking or any other abuse of human rights identified in 2023.

Training

We have extensively communicated the principles set out in our Code of Conduct as well as the Human Rights Policy, to all employees via our internal communication channels. We encourage our employees to respect the dignity and human rights of colleagues and all other people they come into contact with, in the course of their work.

Equally, the appropriate instructions are communicated to our suppliers during the commercial negotiations prior to entering into a final agreement.

This statement has been approved by the boards of each of Lotus Bakeries UK Ltd, Natural Balance Foods Ltd, Urban Fresh Foods Ltd, The Kids Food Company Ltd and Peter's Yard Wholesale Ltd.

Twan Thorn
Managing
Director The
Kids Food
Company Ltd

Paul Hunter
Managing Urban
Fresh Foods Ltd

Rozi Prekop
Director Natural
Balance Foods
Ltd

Mark Staniforth
Managing
Director Lotus
Bakeries UK Ltd

Jean-Baptiste
Robert
Managing
Director Peter's
Yard Wholesale
Ltd