



Slavery and Human Trafficking Statement 2020

The following statement sets out the actions taken by Glanbia to address modern slavery and human trafficking risks in our business and supply chain for the financial year ended 02 January 2021.

Our Structure and Supply Chains

Our Business

Glanbia is a global nutrition group dedicated to delivering better nutrition for every step of life's journey. We deliver essential nutrition every day.

We are committed to finding better, healthier and more sustainable nutritional products that fit the lifestyles and needs of people around the world. We are constantly innovating, developing, and reinventing our brands and ingredients.

In 2020 we formalised our flexible working models through the Group-wide launch of our Smart Working Initiative and placed a renewed focus on Glanbia's Diversity and Inclusion (D&I) culture through the development of a Board approved D&I strategy. We also developed a long-term sustainability strategy, 'Pure Food + Pure Planet' which aims to accelerate our ambition to put sustainable growth at the heart of our business model.

Total Group employees, including Joint Ventures, increased to over 7,600 people in 2020, based in 34 countries. Our major production facilities are located in Ireland, the US, the UK, Germany and China. We have two global growth platforms in Glanbia Performance Nutrition and Glanbia Nutritionals. We also have key strategic long-term partnerships in our Joint Ventures which include Glanbia Ireland.

At the start of the COVID-19 pandemic, the Group set three priorities: protect our people; continue supplying food; and maintain a strong financial position. Our operating model enabled us to respond swiftly and appropriately to both the local and global challenges presented by the pandemic. This included the immediate establishment of a Group-wide business continuity team to deliver key initiatives across the Group, including new working processes for essential staff, additional safety precautions on production sites, remote working support, regular engagement with our people, and a range of employee relations measures to assist all of our people.

Organisational Structure

Glanbia Performance Nutrition (GPN) is a global performance nutrition and lifestyle business, comprising of the following portfolios: North America Performance Nutrition, North America Lifestyle, International and Direct to Consumer. GPN holds eight brands ranging in appeal from consumers looking to improve their athletic performance to those seeking on-the-go snacks and beverages to support weight management and a healthy lifestyle. Our brands are sold in over 100 countries in mass retailers, speciality stores, pharmacies, and online.

Glanbia Nutritionals (GN) is comprised of Nutritional Solutions (NS) and US Cheese. NS is a global provider of innovative nutritional and functional solutions. Through its extensive portfolio of dairy and non-dairy ingredients and capabilities, NS provides a wide range of science-led solutions to customers across the globe. US Cheese is the number one producer of American-style cheddar cheese, supplying our natural cheese to brand owners and other leading food service organisations globally.

Joint Ventures are primarily related to dairy activities where we operate a number of robust joint venture models with our partners including:

Glanbia Ireland – the largest Irish-based integrated agri-food and dairy nutrition business, with a diverse portfolio of quality ingredients, and leading consumer and agri-brands.

MWC-Southwest Holdings – are US producers of American-style cheddar cheese and whey ingredients with an existing plant in New Mexico and a new plant at the commissioning stage in Michigan.

Glanbia Cheese UK – a large-scale manufacturer and marketer of mozzarella cheese.

Glanbia Cheese EU – a joint venture established in 2018 to construct a mozzarella cheese plant in Ireland. The plant is now at commissioning stage with a view to commencing production in H2 2021.

More information on our business can be found in our **2020 Annual Report and Financial Statements** which can be accessed at www.glanbia.com.

Supply Chain

A transparent, responsible, and sustainable supply chain

As a global nutrition company, we are passionate about helping people understand how we deliver sustainable ingredients and brands in an efficient manner. Glanbia's supply chain spans procurement of raw materials, packaging and transport globally. In 2020, over 50% of Glanbia's global spend was attributed to the purchase of milk as a raw material.

We engage with our suppliers through: ongoing dialogue via our commercial supply chain teams; assessments against our policies including anti-bribery and anti-corruption, human rights and environmental policies; and through dedicated farm relations teams. Our publicly available policies can be located [here](#).

In 2020, a new Global Procurement policy was launched across the organisation setting out the principles that guide the required behaviours in the procurement process to enable value-focused, effective and responsible sourcing in the execution of Glanbia's business. The launch of this policy was also accompanied by Glanbia Procurement's new mission statement "Creating value for all stakeholders through responsible procurement". Glanbia's procurement teams work closely with key stakeholders to manage activities in the areas of supplier selection, contract negotiation and supplier performance. Under the policy, procurement teams are required to apply responsible sourcing criteria to our selection decisions and requires all suppliers to be compliant with laws, regulations and social customs for the countries they operate in and to comply fully with all human rights, labour, food safety, environment and health and safety regulations. The policy governs Glanbia's new 'Supplier Process' which suppliers must go through before they can become available to purchase from through Glanbia's procurement systems.

In accordance with Glanbia's commitment to zero tolerance of slavery and human trafficking, our procurement teams use the Global Slavery Index (GSI) to identify high risk supply regions and ensure all Glanbia suppliers that meet these criteria are SEDEX (Supplier Ethical Data Exchange) registered and approved. Less than 1% of Glanbia's spend is considered high-risk when assessed against the most recent [GSI Report](#). We have completed initial due diligence in this area and will continue to monitor progress to ensure all high-risk suppliers are SEDEX registered and approved.

Our People

One of Glanbia's goals is to develop the talent, culture, and values of Glanbia, within an inclusive framework that protects and develops our people, respects the wider community and upholds international human rights.

Human rights

Treating people with dignity and respect is core to Glanbia. Our Human Rights Policy is grounded in the UN Guiding Principles on Business and Human Rights. This policy applies to all Glanbia employees, others acting on Glanbia's behalf and our suppliers.

The Group's policy is to comply fully with the relevant employment laws and regulations in the countries in which it operates. Each site has responsibility to ensure that appropriate processes and controls are in place to ensure compliance and adherence with all relevant legislation.

Glanbia upholds the principles set out in the Universal Declaration of Human Rights and the International Labour Organisation's core conventions.

Culture and engagement

Our people are fundamental to delivering success for Glanbia and we are committed to fostering a culture where our employees are motivated, empowered and supported to perform to the best of their ability.

Key engagement programmes including roadshows and townhall meetings between members of the executive committee and employees quickly pivoted online in 2020 and we extended our wellbeing programmes to support social, physical, and mental wellness.

Health and safety

Glanbia prioritises its responsibility to ensure that no worker is exploited, that they are safe, and that relevant employment, health and safety and human rights laws and international standards are adhered to, including free movement and communications.

The health and safety of our employees is inherent in our Glanbia values and is reflected in our health and safety policy and our organisational goal of 'Zero Harm'. This is achieved by maintaining the highest possible global safety standards using sites with no Lost Time Case as one of the Group's non-financial key performance indicators (KPIs).

Our Statement on Modern Slavery and Associated Policies

Glanbia is committed to upholding international human rights and to acting with integrity in all of its dealings, relationships, and supply chains. We have a zero-tolerance approach to slavery and human trafficking.

The disruption caused by COVID-19 to markets, trade and supply chains in the past year made it clear that solving our shared challenges will require working in broad global coalitions. We continue to strongly support the UN Sustainable Development Goals and its initiatives and principles for human rights, labour, the environment, and anti-corruption.

Governance

Board oversight, clear policies, robust systems, active stakeholder engagement and disclosure are all fundamental drivers of our sustainability programme.

The Group's Corporate Responsibility Council (CRC), is sponsored by two members of the Group Operating Executive, the Group Director of Human Resources and Corporate Affairs and the Group Secretary, who oversee our Corporate Responsibility framework. The Group Director of Sustainability, the SVP of Quality & Safety and each of the segmental Chief Operating Officers are also members of the CRC.

To ensure clarity on the ethical standards we require from every employee and supplier, there are a number of key policies which set out the requirements within the Group and also with those who we seek to do business with, including the:

- Group Code of Conduct
- Group Environmental, Health & Safety Policy
- Group Human Rights Policy
- Group Diversity and Inclusion Policy
- Anti-Bribery and Corruption Policy
- Global Procurement Policy

Risk Assessment and Due Diligence Processes

To ensure compliance with our policies, we take the following steps to assess and monitor potential risks in our supply chain:

- Mitigate against the risk of slavery and human trafficking by following the Global Procurement Policy requirements;
- Independent audits of our operating sites through the Glanbia Risk Management Process; and
- Facilitate, without fear of recrimination, our people in reporting any concerns in relation to slavery and human trafficking within the Group operations or supply chain.

When it is difficult or impractical for an employee to raise a concern within the Group, we offer a hotline service that allows employees to report the issue confidentially. The hotline can be contacted 24 hours a day, 7 days a week, in each of the countries in which we operate. Details are set out in the Group Code of Conduct.

Where a supplier is identified as not having suitable controls in place to prevent slavery and human trafficking, we will assess whether we can work with them to address the improvement opportunities. If the supplier in question is unwilling to engage with us, or suitable controls cannot be put in place, we will discontinue our relationship with the supplier in question. It may also involve notifying relevant authorities of the issues involved.

Measuring Effectiveness

Review of Whistleblowing Procedures

A review of the whistleblowing procedures is conducted on an annual basis to ensure it is operating effectively with bi-annual metric reporting to the Audit Committee. This provides an overview of how concerns raised are categorised, investigated, monitored, and reported together with a review of the main themes, issues and resolution actions arising. Opportunities to improve the effectiveness of the Group's whistleblowing arrangements are also considered.

For the year ended 02 January 2021, the Committee concluded, and confirmed to the Board, that it was satisfied that the Group's whistleblowing and other fraud prevention and detection procedures are adequate and allow for the proportionate and independent investigation of such matters and appropriate follow up action.

In 2020, there were no reports of trafficking or modern slavery received through this service.

Glanbia Risk Management System (GRMS)

GRMS is an auditable framework for the identification and management of operational risks across the Group. Assessment and ranking levels are based on international risk management standards. Assessments are conducted by an independent third party to help drive a culture of continuous improvement across our sites. During COVID-19 restrictions in 2020, the new online GRMS programme aided the performance of remote self-assessment verifications and audits.

Results of the annual Glanbia Risk Management Review process are summarised and shared with the CRC and reported in the Annual Report as a Group non-financial KPI.

Training for Staff

Commitment to Training

Glanbia continue to develop its commitment to combat slavery and human trafficking and will provide staff training where appropriate. Our policies are available online to all employees and updated as required for any relevant changes during the year.

During 2020, a suite of COVID-19 site protection and employee welfare policies were developed and accompanied by supporting training modules, with the aim of helping to protect people and to remind them of their rights.

Future Steps

The Group is taking the following steps to continue to address the risk of slavery and human trafficking during the current financial year ending 01 January 2022:

- Provide enhanced training to relevant Directors and employees on dealing with suppliers and other parties in countries where slavery and human trafficking are a higher risk.
- Develop the learning objectives of Glanbia's procurement teams to incorporate ethical sourcing criteria.
- Continue to engage with relevant organisations and advisors to ensure that our awareness of risks and emerging good practice in relation to the prevention of slavery and human trafficking remains current.
- Enhance our supplier on-boarding and sourcing processes to promote greater awareness and acknowledgement of the important Glanbia standards and policies as outlined within this statement.
- Review the effectiveness of our current policies and procedures and the measures in place to assess the management of the risks identified.

Approval

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and the Australian Modern Slavery Act 2018 (Cth). It constitutes the slavery and human trafficking statement of Glanbia plc's UK and Australian legal entities in respect of the financial year ended 02 January 2021.

Glanbia is aware that the other countries it operates in have similar pieces of legislation requiring companies to comply with human trafficking and anti-slavery laws and it is for this reason that this statement is to be read as applying to Glanbia entities across all of the locations we trade in.



Siobhán Talbot
Group Managing Director
June 2021

Glanbia Holdings Limited
Glanbia Investments (UK) Limited
Glanbia Milk Limited
Glanbia Performance Nutrition (UK) Limited
Glanbia Performance Nutrition (UK Sales Division) Limited
Glanbia (UK) Limited
KSF Acquisition UK Limited
Waterford Foods International Limited
Glanbia Performance Nutrition Pty Ltd
Glanbia Feedstuffs Limited
Glanbia Foods (NI) Limited



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