

**Prima Foods UK Ltd
Environmental, Social and Governance Strategy**

Prima Foods (ESG) Strategy:

1. Introduction

We are Prima Foods UK Ltd manufacturers of ambient bakery ingredients for the bakery & retail sectors and frozen, cooked, ready meal components for the ready meal sector. The company is making steps to reduce its environmental impact.

The Company aims to implement the highest environmental, social and governance (ESG) standards appropriate to its size and sector. The prosperity of the Company and of the communities within which it operates requires a commitment by it to the sustainable management of its activities.

Rapidly developing legal and voluntary frameworks, stakeholder demands and increasing environmental concerns, all mean that ESG is fast becoming a top priority for businesses. To keep pace with this change, the Company wishes to:

- keep abreast of the most up to date information available to it;
- understand the risks and opportunities ESG presents; and
- take action to ensure that the Company continues to satisfy stakeholders and places itself in the best position for long term, sustainable development.

It is recognised that a failure to tackle ESG issues that are relevant to the Company may lead to, amongst other things, regulatory enforcement as well as to pose a litigation, physical, commercial, financial and reputational risk to the Company that may adversely affect its sustainability and resilience.

The directors of the Company already have a duty under Section 172 of the Companies Act 2006, to promote its success. This means that each of its directors must act in the way they consider, in good faith, would promote the success of the Company for the benefit of its members as a whole.

However, in addition, the directors have decided to develop a robust and transparent ESG strategy that goes further than this Companies Act duty and affects and enhances all areas of the Company's business in line with ESG issues, by focusing on the UN sustainability goals of improving good health and well-being, responsible production and consumption and taking action to reduce climate change & its impacts on the environment, alongside reducing hunger.

The Company wishes to adopt this strategy as a framework for how the directors will manage ESG issues relevant to the Company's business.

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2. ESG Audit

The Company is an SME and operates in the Food sector.

In the first instance, we will carry out a comprehensive ESG audit and material risk assessment across its business to establish:

- What ESG means for the Company;
- Which stakeholders should be consulted; and to
- Establish an ESG baseline.

Materiality

The Company considers the following to be material to it:

Reducing the use of packaging, energy, water & natural resources wherever possible alongside reducing food waste other wastes to reduce the company's carbon footprint, as far as practically possible within scope 1 & 2.

To offset the company's carbon footprint and become net carbon zero by 2033.

Stakeholders

The Company will consult with the following parties to ensure that the company's environmental objectives are achievable and sustainable:

- Employees
- Suppliers
- Customers
- Other key stakeholders

Baseline

The Company shall identify existing policies, processes and practices it already has in place that consider matters closely aligned with ESG.

The following policies, processes and practices are considered relevant:

- Prima Foods Environmental Policy
- Prima Foods Environment Audit and Objectives
- Prima Foods Social Audit & Objectives
- Prima Foods Ethical Trading Policy
- Prima Foods Health & Safety Policy
- Use of palm oil within the business and compliance with RSPO approval or use of IP palm oil.
- Membership and support of SEDEX
- Membership and support of The Green Organisation

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- Accreditation from the Green Dragon Environmental Standard.
- Prima Foods Policy on moving from being a minimum wage employer to a real living wage employer – currently being written.

These policies will be assessed for their usefulness in relation to ongoing ESG related activity and may also be useful to establish which ESG areas the Company should prioritise and which stakeholders it should consult.

3. ESG objectives and framework

Having carried out a thorough ESG audit as set out above, the Company will identify its priority areas and set out its ESG objectives. It will implement an ESG framework based on these priorities through new policies, processes and practices relevant to the Company's size and sector.

Prima Foods Strategic Goals & Objectives.

1. To have completed a full Environmental & Social Audit to establish and quantify the company's baseline position by the end of Q1 2024.
2. To achieve Green Dragon Level 1 accreditation by Q2 2024.
3. To become a living wage employer by the end of 2025. (currently 75% of our employees earn the real living wage)
4. To become Net Carbon Zero business by 2033. By reducing the environmental impact of our business through reducing packaging, waste and unnecessary activities and increasing the use of renewable energy within scope 1 & 2, and off-setting the balance through regulated and accredited organisations. (Quantifiable by our Environmental Audit)

4. Board Terms of Reference & ESG Committee

The Company aims for its board of directors and senior management team to achieve the highest standards. It already has robust and transparent legal and professional standards in place but also aims to incorporate relevant ESG considerations into the board's terms of reference.

This includes ESG matters being reviewed monthly as part of the management and board meetings and will remain key to the board's decision-making process going forward.

The committee has been created specifically to consider ESG matters and advise the board accordingly as set out below:

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The Sustainability Committee		
Name	Job Title	Key Sustainability Responsibilities
Julian Rice	Sustainable Supply Chain Manager	To be the environmental lead, and have overall responsibility for the Environmental Management System by setting environmental objectives, targets & improvements and then measuring, monitoring and driving Sustainability within the business and its wider supply chain. Keeping all staff aware of environmental responsibilities, commitments, roles, authorities and environmental performance.
Michal Borcinski	Sustainable Process Improvement Manager	To be responsible for measuring and communicating key levels of consumption, all forms of waste and promoting continuous process improvement, within the business. Integrating EMS across all of the organisations' activities and assisting the SSCM in setting environmental objectives, targets & improvements and then measuring, monitoring and driving Sustainability within the business. Keeping all staff aware of environmental responsibilities, commitments, roles, authorities and environmental performance. To assist in communicating on all environmental issues internally.
Massimo Scotti	Head of Innovation & NPD	To ensure that sustainability is designed into all new products and innovation within the business.
Stuart Mcloughlin	Technical Manager	To be responsible for implementing and maintaining the EMS, keeping policies up to date, sustainable systems, policies and standard operating procedures within the business and interfacing with external bodies such as suppliers, customers and audit bodies.
Tim Rowe	Technical Director	To advise the committee on latest sustainable developments and implementations being applied within the wider food sector.
Peter Rice	Managing Director	To ensure that sustainability is integrated into the decision-making process at all levels of the business and that support, direction and resources are provided to permit the effective implementation, operation and integration of the EMS within all of the organisation's business processes. Communicating on all environmental issues internally and externally. To ensure a monthly and an annual review of the EMS system and the objectives of the team.

TBC	Operators / Supervisors	To be added once the structure of the sustainability system has been fully set up and is operating successfully.
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1) Updating Existing Policies

The Company has implemented several policies appropriate to its business that consider staff/people, customers, suppliers, health & safety, the environment and the community. To bring these policies in line with the Company's ESG strategy and ESG requirements and its proposed new ESG policy document, it will review and update on an annual basis.

2) Measuring and Reporting

The ESG committee and the directors will regularly review, measure and report to stakeholders at suitable intervals on the Company's progress in implementing its ESG strategy and new ESG policy. This will include monthly monitoring of the Environmental & Social Action Plan and a review of strategic objective on a quarterly basis.

