

## Modern Slavery and Human Trafficking Statement for fiscal year 2025 January 2025 - 31 December 2025

Raisio Plc is an international company specialised in healthy, responsibly produced food and ingredients. Our well-known and beloved brands, such as Benecol® and Elovena®, are part of everyday life in millions of households. We have around 350 healthy food colleagues in seven countries and export to more than 40 markets around the world. We also sell oat based products and healthy food ingredients to industrial and bakery customers, particularly in Finland and Europe. All four of our production facilities are located in Finland. Our key offices are in Finland, the UK, Ireland, Poland and Ukraine. The Group's head office is in Raisio, Southwest Finland.

Group's net sales from continuous operations in 2025 totalled 224,2 EUR million. Raisio's shares are listed on Nasdaq Helsinki Ltd. This report covers all subsidiaries of Raisio plc, including UK-based Benecol Ltd.

### **Policies and current actions related to slavery and human trafficking**

Raisio Group complies with local and international laws and regulations, generally accepted practices and Raisio's own guidelines. The Raisio Group respects the UN Declaration of Human Rights and the fundamental principles and rights at work as defined by the International Labour Organization (ILO). These rights cover freedom of association, the right to organise or not to organise, the right to collective bargaining, the prohibition of forced labour and child labour, and the employees' right to equal treatment and opportunities. Raisio is a participant in the UN Global Compact initiative.

Human rights, fundamental principles and rights at work are an integral part of Raisio Code of Conduct and Raisio Supplier Code of Conduct. The Raisio Code of Conduct applies to all Raisio Group's operations, employees, management as well as the members of the Board and Supervisory Board. It is approved by Raisio's Board of Directors. All Raisio's suppliers and sub-contractors are expected to comply with Raisio's Supplier Code of Conduct.

In 2020, a global Human Rights Policy was defined for the Raisio Group and it was approved by Raisio's Board of Directors. It complements the company's Code of Conduct and is applied in all Raisio Group companies globally. The policy is found at [Bases of responsibility | Raisio - Responsibility](#)

### **Risk assessments**

Raisio is a listed company headquartered in Raisio, Finland. Raisio's own production facilities and the majority of employees are located in Finland, a country with high legal standards and strict regulation for labour rights. Raisio Group policies and Code of Conduct are implemented globally to all employees.

Raisio's biggest human rights risks are typical for the food industry. The major risks are related to long procurement chains and procurement of labour-intensive raw materials. The risks are managed

by the means mentioned in Raisio's Global Human Rights Policy, for example, by taking the risks into account already when selecting a supplier and by monitoring more closely the acquisitions from potential risk countries. To ensure the responsibility of the entire procurement chain, all the chain operators have to work together. As a part of our continuous work to manage human rights risks in our supply chain, we included an additional human rights risk assessment related to our own work force in 2025.

Currently, most of Raisio's raw materials and services are purchased from low-risk countries, such as Finland and Central Europe. Part of Raisio's products are produced by our well-selected subcontractors, all located in Europe. The company purchases a small part of its raw materials from the higher-risk countries and in these cases, we pay special attention to the supplier's procedures.

### **Due diligence**

Raisio Group expects its suppliers to commit to the Raisio Supplier Code of Conduct, which includes the requirement for respect for the fundamental principles and rights at work as defined by the International Labour Organization (ILO) and human rights principles of the UN Global Compact initiative.

Our key tools for ensuring a responsible supply chain include engaging suppliers in the Raisio Supplier Code of Conduct and supplier self-assessments as well as targeted audits, reducing purchases from countries with high risk on human right violations and ensuring material traceability. We review our tools and risk criteria regularly to make sure they are up-to date.

Raisio's risk survey indicates that Raisio's major human right risks lay in our supply chain. Main risks are related to the purchase of soya, palm oil, cocoa and coffee, which together account for less than 1 per cent of all raw materials used by Raisio. In terms of these raw materials, Raisio's goal is to use responsibility certified raw materials only. We added berries and fruit, as well as their purees, jams and concentrates, to the list of risk raw materials, although the proportion of berries and fruit in our total raw materials is approximately 0,7%. Their classification as risk raw materials is not based on country classification or an individual raw material, but on the fact that their collection and cultivation is highly labour-intensive and thus introduces the possibility of human rights risks even in countries that are not generally classified as risk countries. To minimise the risks, we review the processes of our partners who supply us with berries, fruit and their purees, jams and concentrates to ensure the responsibility of their raw materials and related sourcing.

Raisio audits its suppliers in regular, planned and agreed intervals. The audit process follows Raisio's criteria, which is based on supplier's or raw-material's risk profile. Risk profile consists of quality, food safety and sustainability aspects, among others. All new sub-contractors are audited. In addition to regular audits, Raisio has taken action to implement selected yearly social audits as part of auditing program. Suppliers to be audited are selected based on yearly supplier sustainability risk assessments.

### **Grievance mechanism**

Ethical conduct is defined in the Raisio Code of Conduct. In case of any questions, employees are primarily guided by superiors and the company's legal department. In 2021 we introduced an electronic reporting channel to report any suspicions of abuse. The channel is available not only to employees, but also to Raisio Group's customers, partners and other stakeholders, as required by the European Union's Whistleblowing Directive. The channel can be used to report suspicions of activities that do not comply with Raisio's values, ethical guidelines or applicable laws. To ensure the anonymity of the reports, the reporting channel is managed by an external partner, WhistleB, Whistleblowing Centre. Instructions for reporting are available on the Raisio website at [www.raisio.com/en/responsibility/whistleblow](http://www.raisio.com/en/responsibility/whistleblow)

### **Training and communication**

All employees are trained in the Raisio Code of Conduct. The training is part of the introduction programme of each new worker and is available in two languages, Finnish and English. During 2023 we conducted a Human Rights impact analysis in the supply chain together with an external partner specialised in human rights. The impact assessment project involved people widely across the organization and deepened our understanding of risks and impacts Raisio has on human rights. This process will be renewed in 2026. In 2025 we also conducted a human rights impact assessment concerning Raisio's own workforce, improving transparency and supporting workers' rights in our organisation.

The main external communication channel for Corporate Responsibility for Raisio and its subsidiaries is Raisio Group's Corporate Sustainability report and Raisio Group's web pages: [www.raisio.com](http://www.raisio.com). Human rights are an integral part of our group level Corporate Responsibility work and included in internal training practices related to Corporate Responsibility. In 2025 we focused on improving our expertise in social auditing via trainings. A comprehensive human rights training for all Raisio personnel will be organized in first half of 2026.

### **Further steps**

Raisio is not aware of any human right or labour right violations related to its operations. Raisio continues its work on responsible procurement and human rights due diligence. Human rights are an integral part of Raisio's sustainability program, Good Food Plan. In 2025 Raisio voluntarily prepared its Sustainability Report in line with CSRD requirements. The report is available at [Sustainability report | Raisio - Responsibility](#)

### **Pasi Flinkman**

President and CEO  
Raisio plc

# Signatures

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Signed with

