



DECLARATION ON MODERN SLAVERY 2023

THE COMMITMENT

La Doria is committed to avoiding any kind of involvement and showing any kind of tolerance to slavery and human trafficking connected with the company's products or commercial activities. La Doria is committed to continually re-assess, through a process of ongoing improvement, activities undertaken to fight modern slavery.

This declaration is reflective of the steps which La Doria has taken to act against modern slavery within its business and throughout the supply chain.

ORGANISATION OF THE BUSINESS AND SUPPLY CHAIN

La Doria Spa is a leading producer of tomato-based products, fruit juices and beverages, canned pulses and vegetables and ready-made sauces, principally for private labels. The company has a presence with the Major Supermarket and Discount chains both in Italy and abroad. La Doria Spa - a sole shareholder company - is a private company, controlled by Amalfi Invest S.p.A., whose share capital is held for 65% by investment companies of the Investindustrial VII L.P fund, with the remaining 35% held by members of the Ferraioli family. La Doria Spa holds 63.9% of LDH (La Doria) Ltd, a trading company headquartered in the UK, leader on the British market in the tomato-based product and processed pulses produced by the Group, in addition to other complementary items (dry pasta, tuna and canned salmon). It has a presence at the major UK Supermarket Chains. LDH issued a declaration in compliance with the Modern Slavery Act 2015 setting out the measures undertaken to ensure that slavery and human trafficking are not present within its supply chain, nor in any other part of its operations. For further details on the subsidiary's declaration, see the link <https://www.ldhltd.com/wp-content/uploads/2023/02/Modern-Slavery-and-Human-Trafficking-StatementV1-22.pdf>. The La Doria supply chain includes a number of companies operating domestically and internationally providing the raw materials, semi-finished products, products and services required for production and commercial needs.

CURRENT POLICY AGAINST SLAVERY AND HUMAN TRAFFICKING

La Doria Spa rigorously applies the laws and regulations of the countries in which it operates and the principles of integrity and correctness, respecting the rights of all those with whom it interacts. This commitment is required not only of all in-house personnel, but also all those who directly or indirectly undertake business relations with La Doria. The Policy makes specific reference to employment and discrimination on the basis of age, sexual orientation, state of health, race, nationality, political opinion or religious creed. The Ethics Code and the website at the following link <https://www.gruppoladoria.it/chi-siamo/corporate-governance/permit> anyone becoming aware of violations of the conduct rules and principles established therein to report such (anonymously if preferred) to the Supervisory Board. This Board was set up with the task of supervising compliance with the Ethics Code and the Organisation, Management and Control Model as per Legislative Decree 231/01 for the prevention of covered offenses. This is detailed in the company procedures, the Ethical Code and the Organisation, Management and Control Model ex Legislative Decree 231/01.

La Doria's Ethics Code is shared with suppliers, so that they can follow its principles and conduct rules. The Ethics Code, together with contractual relations, are essential to the supplier relationship. Non-compliance with its provisions permits La Doria Spa to enforce an express resolution clause. The company has begun a process to improve communication with the supply chain of the principles adopted, drawing up contractual clauses and guidelines to generally promote social responsibility and in particular the commitment to utilise labour which complies with national legislation and the conventions of the International Labour Organisation (ILO) in terms of labour, social justice and the universal recognition of human rights in the workplace. In line with the contents of the Ethics Code and the Sustainability Policy, La Doria has adopted the Diversity and Inclusion Policy in order to foster a corporate culture based on respecting and valuing diversity and with the intention of identifying a clear and structured focus on the issue.

The fight against illegal recruitment is a key objective which La Doria has earmarked in the fight against modern slavery. In 2014, ANICAV (the National Industrial Processed Vegetable Association), of which La Doria is a member, signed a memorandum of understanding with a number of key trade unions for the promotion of social responsibility in the supply chain for industrial tomato processing companies. The agreement, in particular, promotes the correct application of the National Labour Contract and the fight against illegal recruitment.

Our human rights policy outlines the minimum standards that we follow and which we expect our suppliers to follow, so as to ensure the upholding of human rights in the workplace. The policy is applied to all our operations and to our supply chain.

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DUE DILIGENCE PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

In addition to the contractual requirements, which require compliance with the Ethics Code and the other provisions in order to identify and mitigate risks in this area, La Doria Spa adopts the ISO 26000 guidelines on Social Responsibility for the Tomato supply chain considered most at risk with regards to the issues identified by this declaration. An external entity audits how La Doria manages the tomato supply chain and assesses effectiveness by issuing a report that is based on the Global Reporting Initiative (GRI) supply chain indicators and the UNI ISO 26000:2010 Social Responsibility Guide, issuing a declaration letter.

Annually, both internal audits and audits by an Independent Entity are conducted in order to demonstrate the compliance of tomato suppliers with these guidelines. Joint visits were carried out by technical and commercial teams for the assessment of raw material suppliers. All La Doria facilities are members of SEDEX (Supplier Ethical Data Exchange), a non-profit engaged in the promotion of ethical principles throughout the supply chains. The organisation is the broadest platform in Europe collating and processing data on the ethical conduct of supply chains.

TRAINING

In order to promote understanding of the modern slavery and human trafficking risks present in its operations and supply chain, the company periodically undertakes a process of education and training to build awareness around the problems of modern slavery, both among in-house personnel and at suppliers, beginning with the highest risk chain (tomatoes) and working with specialised Sustainability consultancy firms.

COLLABORATION AND COMMITMENT

With a view to sustainable development, La Doria in 2017 published its "Zero Edition Sustainability Report."

La Doria Group's Sustainability Report is prepared annually with reference to the GRI Sustainability Reporting Standards (2016) and subsequent updates of the Global Reporting Initiative (GRI) and is audited by the Independent Audit Firm.

In order to strengthen our human rights approach and develop a culture of diversity and inclusion, we have joined the United Nations Global Compact, the world's largest global initiative for business sustainability. It is a voluntary initiative to sign up to ten universal principles related to human rights, labour, the environment and anti-corruption, which promote the values of long-term sustainability through policy actions, business practices and social and civic behaviour. The principles of the Global Compact are shared universally as they are derived from the Universal Declaration of Human Rights, the ILO Declaration, the Rio Declaration, and the United Nations Convention Against Corruption.

APPROVAL

This statement has been approved by the Chief Executive Officer.

The Company is committed to implementing and keeping this Declaration active and communicating it to all personnel in order to promptly identify any need for updating.

December 18, 2023

The CEO

