

# DEFORESTATION-FREE POLICY

This Deforestation-Free Policy sets out Fox's Burton's Companies (FBC) UK Limited's commitment to sourcing only assured deforestation-free commodities, effective from 1 January 2026. The policy is being implemented to reduce our impact on the environment and align with our validated climate targets commitments under the Science Based Targets initiative (SBTi), which includes our commitment to halt all actions that cause deforestation by the end of 2025. It outlines the principles, requirements, and verification processes that apply to all suppliers and internal teams, covering key commodities including cocoa, soy, palm oil, coffee, and timber, and details the due diligence, monitoring, and assurance measures to prevent deforestation and support FBC UK's climate commitments.

## 1. ABOUT FBC COMMITMENTS AND CLIMATE TARGETS

Fox's Burton's Companies (FBC) UK Limited ("FBC UK") is committed to sourcing only assured deforestation free commodities into our business, effective from 1 January 2026.

We recognise that deforestation and ecosystem conversion are complex global challenges requiring a multi-pronged approach. This policy statement sets out our Deforestation-Free Principles for these areas.

In May 2025 FBC UK received validation for our climate reduction targets from the Science Based Targets initiative. This means we have committed to reach net-zero greenhouse gas emissions (GHG) across our value chain by 2050 and to reduce our absolute emissions from Forestry, Land and Agriculture Guidance (FLAG) practices by 36.4% by 2032. As part of this commitment, we will halt all direct or indirect actions that cause deforestation by the end of 2025.

For FBC UK, the primary deforestation-linked commodities relevant for our business are cocoa, soy, palm oil, coffee and timber. We require all suppliers of these commodities, supplied directly or through embedded products, to be deforestation-free and independently verified by 1<sup>st</sup> January 2026.

From 1 January 2026, it is a condition of our supply agreement that all in scope commodities supplied to FBC UK will be deforestation free and suppliers will, on request, provide documentary evidence of land use history relating to growing locations of the relevant supplied commodity.

## 2. APPROACH AND ENGAGEMENT

We are committed to sourcing deforestation-free commodities and preventing any adverse environmental impact of our operations through a due diligence-based approach. Our approach is guided by:

- The Accountability Framework Initiative (AFI)
- The Science Based Targets initiative (SBTi) FLAG guidance
- Relevant national and international environmental standards

Where there is a conflict between these standards and applicable laws, we comply with the applicable laws while seeking ways to honour global best practices.

### **3. IMPLEMENTATION**

This Statement is communicated to all employees via internal channels and to our supply partners through our procurement, technical, commercial and sustainability functions.

We will take appropriate steps and measures to identify, prevent, and address any deforestation risks we may cause or contribute to, or where a risk is directly linked to our operations, products, or services through a business relationship. We also expect our supply partners to take appropriate steps and measures to identify and address any deforestation risks they may cause, contribute to, or be linked to through their own operations and supplier relationships.

### **4. GOVERNANCE**

Executives across Sustainability, Procurement, Technical and Legal functions oversee the implementation of our Deforestation-Free Principles across our supply chain to fully engage internal and external stakeholders.

### **5. OUR PRINCIPLES**

We are committed to focusing on these commodity areas in line with SBTi FLAG guidance areas but recognise that other land-use issues may become priorities over time. We review our focus areas regularly and will update this Statement as needed.

#### **5.1. Cocoa**

All cocoa must be deforestation-free and verified through independent certification mechanisms. We support certification schemes such as Rainforest Alliance and Fairtrade and supplier accreditation schemes.

### 5.2. Soy

Soy must be sourced from verified deforestation-free regions or suppliers, with traceability to origin and compliance with zero-conversion standards.

### 5.3. Palm Oil

Only RSPO-certified palm oil is accepted, with full traceability to mill and plantation level. We do not source from suppliers involved in peatland destruction or illegal land conversion.

### 5.4. Timber and Paper

Timber and paper products must be FSC-certified or equivalent, and sourced from responsibly managed forests with no links to illegal logging or ecosystem conversion.

### 5.5. Coffee

All coffee supplied to FBC UK must be deforestation-free, with independent verification through recognised assurance schemes. We support certification programs such as Rainforest Alliance and Fairtrade and require full traceability to origin to ensure compliance with zero-deforestation standards.

## 6. SATELLITE MONITORING

To strengthen our due diligence and verification processes, FBC UK reserves the right to implement **satellite-based monitoring systems** to track land use changes and detect potential deforestation in our supply chain including:

- Using geospatial tools and platforms to monitor sourcing regions for cocoa, soy, palm oil, and timber
- Partnering with third-party providers to access real-time deforestation alerts and land conversion data
- Integrating satellite insights into supplier risk assessments and compliance reviews
- Requiring suppliers to cooperate with geolocation data sharing and verification processes

This technology will enhance transparency, accountability, and our ability to respond swiftly to environmental risks.

## 7. ASSURANCE AND MONITORING

From 1 January 2026, it is a condition of our supply agreements that all relevant commodities supplied to FBC UK are deforestation-free and independently verified. Suppliers must provide documentary evidence of land use history upon request.

We will monitor compliance through supplier engagement, audits, and satellite-based verification tools. Non-compliance may result in remediation or termination of commercial relationships.

## 8. REPORTING AND REVIEW

This Statement consolidates our existing commitments and aims to increase clarity and transparency in our practices. We reserve the right to review this Statement regularly and update it as necessary. The latest version will be posted on our website: [www.fbc-uk.com](http://www.fbc-uk.com)

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