

WHAT'S COOKING MODERN SLAVERY ACT POLICY

LEGAL DEPARTMENT

Owner: Ann De Jaeger

Distribution: All Employees

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EFFECTIVE DATE

November 1, 2023
(Version 1)

This policy supersedes complements the Code of Conduct Policy, and is in no way intended to replace these policies.

What's Cooking?'s modern Slavery Statement for UK and EU

This statement has been published in line with the UK Modern Slavery Act 2015 and amendments as well as similar Acts or applicable legislation in other countries where What's Cooking? operates directly or indirectly its business. It outlines the measures taken by What's Cooking? companies (also named 'What's Cooking?') to prevent slavery, servitude and forced or compulsory labour (Modern Slavery) in our business and supply chains.

1. Introduction

What's Cooking?'s mission is to change the way the world eats for the better. We care for people and for the planet. We rely on our brilliant brands, building strong relationships with our customers and partners, and care and invest in What's Cooking? employees.

At What's Cooking?, everything we do must respect our ethical standards and the laws of all countries where we operate. Our Business Code of Conduct sets out our commitment to our stakeholders and the standards of behaviour to which all of us at What's Cooking? must adhere. This is vital not only for the effectiveness and the sustainability of our business, but also for the continued reinforcement of our dual economic and social commitments.

What's Cooking? strongly believe that people are their greatest assets, as we work side by side with all of our people in order to produce, source and sell our great products.

The creation of social and economic value is at the heart of what What's Cooking? has been doing for more than 75 years. With and through What's Cooking?, we will further build our impact for a better world, were we will make a difference to our company, our planet and the communities with whom we share the world with.



2. Organizational structure and supply chain

*What's Cooking? is a **European fresh savoury food group headquartered in Belgium** which commercialises in Europe and beyond a wide range of high-quality and innovative savoury cold cuts, snacking and ready meal food products (also known from Come a casa®), and related services. “**Day by day, we make sustainable food second nature** by increasing the world’s appetite for tasty, convenient meals, crafted with care both for the people and the planet”. Our customers and consumers are always on our hungry minds when preparing our food products, as is the well-being of our approximately 3,000 people from our headquarter, 12 industrial sites in Belgium, the Netherlands, France, Poland, and the UK, and 7 sales offices. What’s Cooking Group (previously named Ter Beke) exists for 75 years, is listed as family company on Euronext Brussels since 1986 (WHATS) and realised a turnover of EUR 781 million in 2022.*

3. Steps taken

Gradual adoption of What’s Cooking?’s policies

(a) External policies

Business Code of Conduct for suppliers incl. Sustainability & Ethical Principles

All suppliers contracting with What’s Cooking? must accept these principles as these are part of their contract. What’s Cooking? cannot work with a supplier who refuses to accept these key principles.

By accepting these principles, a supplier commits i.a. to respect 7 social principles which are based on the international labour standards defined by the International Labour Organisation:

Child Labour

The supplier does not employ children aged under 15. If the law sets a higher minimum working age or compulsory schooling is to a higher age, it is this limit that applies. Educational programs and training are not included in this limitation.

Forced Labour

The supplier does not use forced or compulsory labour, meaning any work or service performed under threat or that is not consented to by the person concerned. This refers to the three following Principles:

- Every worker should have freedom of movement and freedom to leave employment subject to normal contractual provisions. The ability of workers to move freely should not be restricted by the Company through physical restriction (confinement) abuse, practices such as retention of passports and valuable possessions, threat of reporting illegal workers to the authorities or the menace of any form of penalties.
- No worker should pay for a job. Fees and cost associated with recruitment and employment should be paid by the employer, not the employee (Employer Pays Principle).
- No worker should be indebted or coerced to work. Workers should work freely, aware of the terms and conditions of their work in advance and paid regularly as agreed. No worker should be indebted to work as a result of excessive recruitment fees, unauthorized deductions from wages, disciplinary measures, fines or inflated prices for company goods, tools or uniforms.

Discrimination

With due regard for applicable law, the supplier refuses to engage in any discriminatory practices. Discrimination means any distinction, exclusion or preference limiting equality of opportunity or treatment. It may be based on race, colour, sex, sexual orientation, religion, political opinion, age, nationality, family obligations or other considerations.

Freedom of association and right to collective bargaining

The supplier recognises and respects employees' freedom of association and their right to freely choose their representatives. The supplier also recognizes employees' right to collective bargaining. The supplier ensures that employee representatives do not suffer any discrimination.

Health care and safety at work

The supplier ensures that the workplace and its environment do not endanger the physical integrity or health of employees. Action to reduce the causes of accidents and improve working conditions is the object of ongoing programs. Sanitary equipment, canteens and housing provided to employees are built and maintained in accordance with applicable legal requirements. As a minimum, the supplier must provide employees with drinking water, clean toilets in adequate numbers, adequate ventilation, emergency exits, proper lighting and access to medical treatment.

Working hours

The supplier must ensure that national applicable legal restrictions on working hours, including overtime, are complied with. Employees have at least one day off each week, apart from exceptional circumstances and for a limited period.



Pay

The supplier ensures that:

- No wage is lower than the applicable legal minimum
- All employees receive a pay slip
- Employees receive a decent wage as compared to standard pay practices in their country
- Wage rates for overtime are in all cases higher than for normal hour

All business partners, including suppliers, distributors and other third parties must accept and adhere to this code in order to undertake business with What's Cooking?. This policy i.a. provides that:

Human Rights

Business partners are expected to protect and promote the human rights of their employees. We expect them to be fair employers and to respect international labour standards, including the core conventions of the International Labour Organization and legislation prohibiting slavery and human trafficking.

Health, safety and the environment

Business partners are required to abide by all applicable laws relating to health, safety and the environment in their work for What's Cooking?. We expect them to ensure that adequate measures are put in place to protect the health and safety of their employees [...].

(b) Internal policies

What's Cooking? Code of Conduct

The What's Cooking?'s Code of Conduct provides commitments towards our stakeholders, setting standards of behaviour to which all What's Cooking? employees must adhere. Relevant provisions in this context are:

Compliance with the law

What's Cooking? and its employees must comply with all applicable laws and regulations of the countries in which they operate. Where there is a difference between a legal requirement and the Business Code of Conduct for suppliers or compliance Policies, the higher standard will always be applied.

Employees

At What's Cooking? we are committed to providing a safe working environment where there is respect and equal opportunity for all, including our recruitment, training and career development processes. We respect the human rights of our employees as set out in fundamental convention of the International Labour Organization, including the right to freedom of association. We are committed to providing fair remuneration and working hours, with a healthy work-life balance.

We do not tolerate violence, bullying, harassment, discrimination or any form of forced, bonded or child labour. We welcome diversity and encourage open communication and dialogue between employees and managers, a key part of our entrepreneurial spirit.

Customers

We aim to establish fair and ethical relationship with our customers based on clear and respected terms of business. Where not already in place, we encourage our customers to adopt equivalent business principles to those set out in this Business Code of Conduct.

Business Partners

Business partners are our suppliers, service providers, agents, distributors and labour providers. We are committed to fair and ethical relationships with our business partners, based on clear and respected terms of business, adherence to the principles set out in our Business Code of Conduct for suppliers and a fair selection process.

Community

Our mission is: *Day by day, we make sustainable food second nature by increasing the world's appetite for tasty, convenient meals, crafted with care both for the people and the planet.* As part of this, respect for and dialogue with the communities we work in is key. We endeavour to participate responsibly in our communities and to have a positive impact, not only through our products but also through our business and social activities.

(c) Monitoring and training

Employees shall report any practices or actions believed to be inappropriate under this Code or even illegal to their Line Managers, HR, or the Ethics Line by sending an email to codeofconduct.ethicsline@whatscooking.group reaching the Legal and Compliance function.

If it is appropriate, in view of the nature of the reported matter, reports of violations may be made directly to higher levels including the Group's Chief Executive Officer? or reporting into the **Whistleblower Tool**. Where appropriate, complaints may be made on an anonymous basis.

OBJECTIVE of the Group EU/UK Whistleblower Policy

The **What's Cooking?** group of companies (the "Group") is committed to conducting business operations in accordance with the highest standards of ethical and legal business conduct. That commitment **with ability to report to Local Report Manager** as well as **Whistleblower Software Platform** (<https://whistleblowersoftware.com>) is reflected in the Group's Code of Conduct (<https://whatscooking.group/en-GB/ethics-line>) which sets forth the ethical and legal principles that are fundamental to the way in which the Group conducts its business operations.

The purpose of this Policy is to encourage Employees and Third Parties to promptly report suspected Breaches (as all these terms are defined below) which may affect the European and UK subsidiaries of What's Cooking?¹ (any European/UK subsidiary, the "Subsidiary", all of them, "the Group", and each of the European countries in which each Subsidiary is located, the "Relevant Country"), providing safe channels to report them without fear of retaliation with the aim to strengthen the compliance and information culture within the Group.

¹ "What's Cooking?" means What's Cooking Group NV, with registered office at Beke 1, 9950 Lievegem (Belgium) with RLP in Ghent nr. 0421.364.139.



Reference is made to the group EU/UK Whistleblower Policy in this respect including the Whistleblower Tool:

- Click on the reporting page link :<https://whistleblowersoftware.com>
- Fill out the form and SAVE your password
- Follow-up on your report thanks to your given password

There will be no retaliation against anyone who reports a genuine concern. All cases will be appropriately investigated and, where breaches are found, appropriate actions will be taken.

Furthermore, audits take place in order to confirm that the abovementioned stakeholders respect the outlined principles.

What's Cooking? employees are extensively trained on the Code of Conduct. Non-compliance with the Code of Conduct may result in disciplinary action up to and including termination of employment.

(d) Certification

What's Cooking?'s obtained IFS, Sedex certification and is in process of obtaining SBTI certification. What's Cooking aims for meeting the highest standards of verified social and environmental performance, transparency and accountability. What's Cooking? Given that What's Cooking? needs to retake the verification process in order to maintain the certification, there is a continuous attention to these social interests, which includes measures to prevent slavery, servitude and forced or compulsory labour.

4. Steps to be taken going forward

In order to verify the compliance with the principles of the act and applicable policies, the following steps are in the process of being taken:

- Ad hoc internal and external audits and/or questionnaires
- Continuous audit of signature Code of Conduct
- Ad hoc random onsite visits at factories
- Ad hoc worker interviews

This statement is made pursuant to section 54(1) of the U.K. Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for What's Cooking? Deeside UK Ltd and What's Cooking Savoury UK Ltd.

* * *

Approved and signed by the Group General Counsel & committed by the Management and Board of Directors of What's Cooking?