Orkla Food Ingredients

Transparency Act Report 2025

Orkla Food Ingredients AS (hereafter "Orkla Food Ingredients" or the short form "OFI") is a portfolio company of Orkla ASA ("Orkla") and consists of several subsidiaries in Norway and other countries in Europe and the USA. This report describes Orkla Food Ingredients' efforts related to human rights and decent working conditions, including due diligence assessments pursuant to section 5 of the Norwegian Transparency Act.

The report covers Orkla Food Ingredients and its subsidiaries, and reported figures relate to the 2025 financial year (1 January–31 December). The reporting on impacts, targets and plans also includes information from the latest human rights impact assessment which was carried out during the spring of 2026. Information about the progress of Orkla Food Ingredients' work with environmental, social and governance (ESG) topics for 2025 can also be found in Orkla ASA's annual report for 2025[1].

Table of contents

[1] Orkla ASA's 2025 annual report is available here: Orkla - Annual Report. Orkla's sustainability report can be found on page 41 of the annual report and selected key figures and sustainability targets for Orkla Food Ingredients on pages 12 and 125.

Orkla Food Ingredients

1. Description of Orkla Food Ingredients' business

Orkla Food Ingredients supplies raw materials, products and solutions to a broad spectrum of customers in the bakery, ice cream and plant-based markets, and has a leading position in Europe as well as a platform for growth in the United States. The company had operating revenues of approximately 21.2 billion NOK in 2025. Important sales channels include industrial manufacturers that primarily produce and supply products for the grocery sector, the "Out of Home" segment – such as artisanal bakeries and ice cream kiosks – and direct-to-consumer sales. Key products include pastry and bread ingredients, margarine, frozen cakes and yeast.

OFI is building a leading European and American food ingredients business targeting a large and diverse market. The ambition is to be a leading supplier of effective, sustainable solutions that help customers succeed. Orkla Food Ingredients focuses on building strong local companies with good growth potential while leveraging synergies across the group. Based on strong national positions, the objective is to continue gaining local market shares by offering tailored solutions.

OFI is committed to responsible operations with respect for people, the environment and society and has internal governing documents and procedures for managing environmental, social and governance-related risk issues. OFI aims for sustainability to be an integrated part of business strategy and has defined long-term ambitions linked to creating positive impacts for own employees and workers in the value chain.

Orkla Food Ingredients' ambitions for positive human rights impacts

Own employees:

- Safety and wellbeing for every team member
- A fair, inclusive and engaging workplace
- A culture of growth and opportunity

Workers in the value chain:

- Promote fair and safe working conditions for all workers across the value chain
- Prevent child labour in our supply chain

Organisation of the business

Orkla Food Ingredients is a limited liability company and has its registered address at Drammensveien 149, Oslo (Norway). The company's organisation number is NO 911 161 419, and the head office is in Oslo, Norway. Orkla Food Ingredients is one of Orkla's ten portfolio companies. Orkla holds a 60% ownership position, while the private equity investment firm Rhône Group holds a 40% position in the company. Orkla ASA is listed on the Oslo Stock Exchange.

At year-end 2025, OFI had a total workforce of 4,138 employees[2] and approximately 250 non-employees[3] in 21 countries in Europe and in the USA. OFI has more than 50 operational companies structured in three clusters: Bakery Ingredients, Sweet Ingredients and Plant-based. OFI has a significant number of production units, and the company's own manufactured products account for around 63% of sales. The remaining sales come from products produced by external business partners.

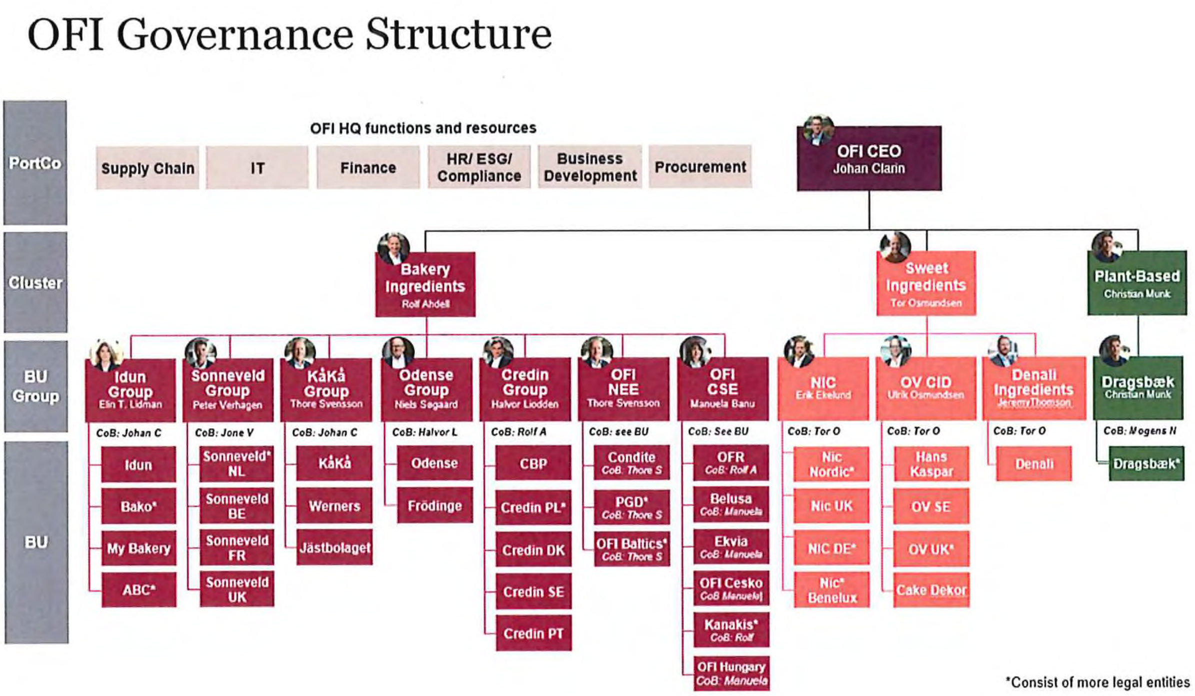
Important functions in the OFI companies include manufacturing, maintenance, logistics, product development, marketing, sales, procurement, quality and food safety, finance and human resources. OFI is a significant purchaser of food raw materials, packaging and traded goods, with an estimated total number of direct suppliers

[2] Includes permanent employees, temporary employees and employees with non-guaranteed working hours.
[3] Includes self-employed persons (independent contractors) and persons employed by staffing agencies.

of around 2,800. Through own operations and that of suppliers and sub-suppliers, OFI may have a direct or indirect impact on more than a million workers throughout the company's value chain.

The present report covers Orkla Food Ingredients and its business units.

Orkla Food Ingredients' organisation structure



2. Guidelines and governing principles

2.1. Orkla Food Ingredients' governing documents on human rights and decent working conditions

Orkla Food Ingredients has established policies and guidelines on responsible business practices, including respect for human rights and facilitation of decent working conditions. The guidelines on human rights are enshrined in OFI's governing documents, including the Orkla Food Ingredients Sustainability Policy[4], the Orkla Code of Conduct,[5] the Orkla Supplier Code of Conduct[6] and the Orkla Business Partner Code of Conduct. OFI has implemented policies, systems and procedures to ensure responsible business practices based on company values, Orkla guidelines and regulatory requirements. Among others, these include an Environmental Health and Safety (EHS) Standard, procurement policy and whistleblowing policy.

OFI has processes in place for human rights due diligence, including an annual high-level impact assessment and a long-term plan for improvements. The main steps and principles of OFI's human rights due diligence procedures are based on the principles of the UN Guiding Principles on Business and Human Rights. Section 2.2 and 2.3 below provide a more detailed description of OFI's procedures for due diligence assessments in own operations and the supply chain.

OFI's Board of Directors (BoD) is responsible for monitoring policy implementation in OFI and for ensuring that the operations are conducted in accordance with relevant regulations, the Orkla Code of Conduct and the Orkla Food Ingredients Sustainability Policy. This includes an annual review of OFI's human rights impact assessment and plan.

---

[4] Sustainability | Orkla Food Ingredients
[5] Code of Conduct - Orkla.com
[6] Supplier Code of Conduct - Orkla.com

Orkla Food Ingredients

Orkla Food Ingredients' CEO is responsible for operationalising policies and targets, preparing action plans and ensuring progress towards target achievement. OFI's ESG Board supports and advises the management team and BoD on ESG matters and monitors sustainability reporting.

The companies within OFI are expected to:

- Ensure proper sustainability governance with clear roles, board oversight, and adequate competence
- Implement the Orkla Food Ingredients Sustainability Policy and other ESG-related, common OFI policies, frameworks and management systems
- Manage material ESG issues related to their operations and value chain
- Regularly assess performance, identify focus areas for improvement and report progress to the company BoD
- Maintain reliable sustainability reporting processes, controls, and data quality
- Include ESG-related performance in executive remuneration schemes

Orkla Food Ingredients Sustainability Policy

The Orkla Food Ingredients Sustainability Policy covers environmental, social and governance impacts, risks and opportunities related to the company's operations and business decisions. The policy is based on international guidelines and relevant EU regulations and reflects the principles of Orkla's Sustainability Policy.

The policy describes Orkla Food Ingredients' commitment to respecting human rights and promoting decent working conditions across operations and value chain. Companies within OFI are required to:

- Implement human rights due diligence processes to identify and address potential and actual negative human rights impacts linked to own operations and value chains
- Prevent forced and child labour, protect vulnerable individuals and groups, and respect the freedom of expression, association and organisation, trade union rights and the rights of collective bargaining, privacy and non-discrimination
- Ensure fair wages, reasonable working hours, equal opportunities, diversity, and a safe workplace for own workforce and implement Orkla Food Ingredients' people policies
- Engage with suppliers and business partners to safeguard the rights of workers in the value chain. The companies must ensure that suppliers follow Orkla's Supplier Code of Conduct and Orkla Business Partner Code of Conduct and conduct risk-based follow-up
- Assess and address negative impacts on consumers and communities, support healthier product development, ensure responsible marketing, and engage with local communities to address potential negative impacts and contribute to thriving communities

The Orkla Food Ingredients Sustainability Policy is reviewed annually by the OFI Board of Directors.

Orkla Code of Conduct

The Orkla Code of Conduct applies to all persons working for the Orkla group. This includes employees at all levels in Orkla Food Ingredients, board members, contracted personnel, consultants, contractors and others who act on behalf of or represent Orkla Food Ingredients. The Orkla Code of Conduct contains commitments to safeguarding human rights and decent working conditions, including an expectation of all employees that they contribute to creating a good working environment and respect important human rights.

2.2. Guidelines and procedures applicable to Orkla Food Ingredients' own workforce

In line with the expectations of the Orkla Food Ingredients Sustainability Policy, OFI carries out an annual human rights impact assessment, covering risk issues within own organisation. OFI has policies for occupational health and safety, compensation and benefits; learning and development; recruitment; diversity, equity and inclusion; and performance and talent management. The policies provide operational guidance to the OFI companies and are aimed at creating a safe, equal and inspiring workplace.

OFI seeks to ensure that systematic and proactive steps to promote and preserve health and well-being at work are a natural part of all operations, and has a vision of zero accidents, focusing on measures to prevent any negative impact on employees from their work environment.The annual assessment of human rights impacts covers among others, the risks of work-related injuries, work-related illness, lack of adequate wages and discrimination.

OFI has implemented systematic procedures for occupational health and safety, based on the Orkla EHS Standard. The companies follow a continuous improvement philosophy with a goal of zero harm to own workforce. This includes training, risk assessments, follow up of incidents and implementation of measures for risk-prevention and improvements. All companies operate with a management system for occupational health and safety and report monthly on health and safety performance. Lost Work-Day Injuries (LWDI) are tracked with established follow-up procedures and the OFI companies run health & safety days and local initiatives.

2.3. Policies and procedures for supply-chain due diligence

OFI's commitments and principles for managing potential impacts on workers in the value chain are anchored in the Orkla Code of Conduct, the Orkla Food Ingredients Sustainability Policy, the Orkla Supplier Code of Conduct, the Orkla Business Partner Code of Conduct and the Orkla Procurement Policy. The governing documents include a clear commitment to respect human and workers' rights, to cooperate and have measures in place to remedy adverse impacts, and to stop, prevent or mitigate potential adverse impacts.

OFI has an internal guidance document on human rights due diligence which describes the recommended processes and systems for risk assessment and follow up of suppliers. The policies and guidance are intended to ensure compliance with key international frameworks, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.

The Orkla Supplier Code of Conduct describes OFI's ethical requirements and expectations of suppliers. The requirements are based on the UN Universal Declaration of Human Rights, the ETI Base Code and the UN Global Compact's 10 principles for responsible business conduct. The document sets out clear requirements not to accept child labour or forced labour. It also addresses freedom of association and collective bargaining, acceptable working conditions, adequate pay, work-life balance, health and safety, and equal opportunities. OFI collaborates with Orkla's business service company Orkla Procurement about implementing measures to ensure compliance with these principles. The measures include supplier dialogue, supplier self-assessments and ethical audits. The requirements have been translated into nine languages, and suppliers are required to sign and comply with them when entering into a contract with OFI.

Orkla Food Ingredients has, with support from Orkla Procurement, adopted a risk-based approach to ensure effective dialogue with the company's many suppliers on responsible business practices. In collaboration with Orkla Procurement, OFI conducts an annual risk assessment of suppliers and raw material sourcing, covering criteria linked to working conditions, occupational health and safety, the environment and business ethics.

OFI expects own companies to request suppliers to register in Orkla's Supplier Portal. All suppliers who are added to the portal undergo a risk screening based on a sustainability risk assessment tool developed by Sedex. Sedex is a membership organisation offering a global platform for assessing supply chains through standardised methods and sharing of supplier information.

Supplier engagement efforts are prioritised towards suppliers and supply chains with the highest risk of adverse impacts on fundamental human rights and decent working conditions. For high-risk suppliers, OFI's desired approach is to use a more detailed risk assessment method developed by Sedex, including a self-assessment and, when needed, an ethical audit based on the SMETA framework.[7] The audits provide information on supplier processes and non-conformances, and identified non-conformances are followed up through the Sedex system. As part of supplier audits, a 'Corrective action plan' shall be prepared, which contains requirements and deadlines for suppliers to rectify non-conformances.

To manage high-risk raw materials, OFI seeks to collaborate with suppliers who maintain high standards and have dedicated sustainability programmes. For agricultural raw materials, OFI uses the requirements of the SAI Platform FSA[8] Silver level as a benchmark and guide when considering potential certification schemes and other measures. Orkla Procurement provides support in assessing relevant supply-chain risks and in implementing risk-mitigation measures.

[7] SMETA stands for Sedex Members Ethical Trade Audit. The audit focuses on social and environmental issues and is carried out on-site by Sedex.
[8] The Farm Sustainability Assessment (FSA) is a framework for sustainable agricultural production developed by the SAI Platform. It includes specific criteria for addressing relevant ESG issues.

2.3.1. Cooperation and partnerships

To support Orkla Food Ingredients and other portfolio companies within Orkla, Orkla Procurement actively participates in industry initiatives involving companies, authorities and expert organisations. The most important initiatives include Ethical Trade Norway, AIM-Progress, Sedex and the Sustainable Agriculture Initiative (SAI) Platform. These collaborations contribute to competence-building and stakeholder dialogue.

3. Actual and potential adverse impacts on fundamental human rights and decent working conditions

3.1. Own workforce

Orkla Food Ingredients' human rights impact assessment indicates that the OFI companies implement OFI's people policies in a good way across the organisation, and no severe negative impacts on human rights and decent working conditions in own operations have been documented in 2025.

The following three areas have been identified as having the highest inherent risk of adverse impacts for own employees:

- Working terms and conditions
- Occupational health and safety
- Equal treatment and opportunities for all

3.1.1. Working terms and conditions

Through the human rights impact assessment, some potential negative impacts linked to working terms and conditions have been identified which OFI wants to look further into and target with improvement actions.

Adequate wages

Orkla Food Ingredients wants all employees to receive fair wages, and in 2025, OFI paid attention to employees' increased cost of living as part of the annual pay adjustments. For employees in OFI's production units, wages are determined through negotiated collective agreements. The pay of other employees is set using benchmarking tools which incorporate factors like country, sector, job type and competitive landscape.

The companies within OFI prepare an annual assessment of the compensation paid to own employees compared to external benchmark data for adequate wages provided by the organisation WageIndicator. WageIndicator is a recognised academic organisation which provides regional data on living costs and living wages in more than 200 countries. The calculation of adequate wages considers the cost of living for a typical family and country-specific information about fertility rate, earners per family and tax per worker for a typical family with two children and two working parents.

For 2025 reporting purposes, OFI applied the lower band WageIndicator living wage estimate as the benchmark for adequate wages. In cases where the national legal minimum wage exceeded the lower band WageIndicator estimate, the national legal minimum wage was applied as the benchmark. In 2025, no employees were paid wages below the benchmark for adequate wage used.

Work-life balance

OFI has guidelines for working hours which are implemented through employment contracts and internal procedures for human resources management. Still, several production units are operating at three-shifts which may lead to difficulties in managing the work-life balance for some employees. Also, employee surveys carried out in 2024 and 2025 indicated that some employees experience high work intensity at times to complete tasks, which may create stress. OFI will continue to address work-life balance as an important management topic as part of the occupational health and safety and people processes.

Competence development

OFI aspires to having a culture of growth and opportunities for all employees and organises a variety of competence development programs. The employee survey carried out in 2025 showed an average score of 3.7 on the perceived opportunities for learning and development (scale of 1-5) which is considered a fairly good result. Still, there were variations in score across the companies. Furthermore, in 2025, around 68% of employees were part of the formalised processes for performance and development reviews against a target of 100%. Based on these observations, OFI sees a potential risk that some employees are not receiving the desired level of competence development.

In 2026, Orkla Food Ingredients will continue facilitating learning through internal networks and training programs. For more information on activities and plans, see section 5.

3.1.2. Occupational health and safety (OH&S)

Work-related injuries and ill-health represent an important inherent risk issue for Orkla Food Ingredients. The OFI companies have many employees engaged in manufacturing and logistics activities, by this potentially exposed to a risk for work-related injuries and ill-health. OFI has adopted a zero-harm vision, and the companies work systematically, in tight collaboration with dedicated central functions, to prevent work-related incidents. The rate of recordable work-related accidents in 2025 was 6.6, a slight improvement compared to 2024 (6.8). The number of injuries which led to lost workdays or medical treatment was 48 compared to 50 in 2024. The majority of the work-related injuries were classified as having low severity with regards to employee health based on Orkla's EHS Standard, but some injuries of medium severity also occurred. Each incident is followed up closely to avoid recurrence. The types of injuries are shown in the table below.

Types of injuries registered in 2025

Cuts	Some cases of cuts occurred from dropping a knife when opening bags and boxes, or holding knives when carrying items or performing other tasks
Slips, trips and fall	Some cases of slips, trips and falls occurred due to slippery floor or ice outdoors which resulted in damage to the body, incl. one case of a broken arm
Pinches and crushes	Some cases of hands or feet getting pinched when operators were moving equipment or heavy items, partly due to protective equipment not worn properly. One case of shoulder injury from being hit by a falling object.
Overstrain	Some cases of strained muscles or pain from manual lifting or repetitive straining work
Hits and knocks	Some cases of hits and knocks due to unnecessary hazards in the environment or not enough attention paid to surroundings or colleagues, including one case of a minor concussion
Scalding or chemicals	One case of burn from contact with hot water
Car accidents	Two cases of injuries to sales employees from being hit by another car while driving

In 2025, OFI has focused on improving the reporting of near misses. This resulted in a higher number of observations of potential work safety risks reported. The reporting of near-misses is important for building awareness and identifying risk-preventing measures. In 2026, OFI will use the risk reporting to tailor internal training activities to the risks identified and strengthen the focus on root-cause analysis.

The sick leave in 2025 was 3.7%, performing slightly better than OFI's target of maximum 4.0%. OFI does not have sufficient data to make an accurate assessment of actual problems and risks, but potential causes of ill-health can be ergonomic impacts and repetitive manual work. Other inherent risk issues include exposure to dust, noise or high/low temperatures, exposure to stress over time or insufficient resources or competence.

OFI has implemented a systematic approach to reducing the risk of injuries and work-related illness. This includes regular training, operational risk assessment and guidance and follow up of the production sites and offices. In 2025, OFI carried out several activities to prevent work-related injuries and ill-health and ensure a safe workplace. These activities are described in section 5.

3.1.3. Equal treatment and opportunities for all

OFI has procedures in place to avoid discrimination in connection with pay-setting and promotion, as well as procedures to avoid discrimination during recruitment. This includes defined recruitment processes, pay-setting frameworks, benchmarking of pay systems, structured recruitment interviews and objective skills tests. Still, unconscious biases may affect decision-making in recruitment and promotion processes.

Through a gender pay gap assessment prepared in 2025, OFI has identified a gap in women's share of men's pay (total compensation). The assessment showed an average gap in gross hourly pay between female and male employees in OFI (all levels combined) of 12.7%, an increase compared to 2024 (9.6%). Pay refers to the regular wage and additional compensation, whether provided in cash or in kind, that is given to an employee in relation to their employment. There are variations in pay gap across the OFI companies, and in 2026, OFI will follow up on the companies with high gaps.

In 2025, the OFI companies started to review the job hierarchies used to enable a more detailed assessment of potential gender pay gaps among employees in positions performing similar tasks. The work continues in 2026 and will be aligned with the principles and requirements of EU's Pay Transparency Directive.

For more information about the activities in 2025 and plans for 2026, see section 5.

3.1.4 Other human rights

OFI assesses the risk of violations of children's rights, forced labour and breaches of the right to organise and participate in collective bargaining within own operations as very low. When persons below the age of 18 are offered employment, OFI companies follow national rules and regulations to provide young employees with safe working conditions.

3.2. Workers in the value chain

Orkla Food Ingredients is a purchaser of numerous raw materials, and several companies within the group have extensive and complex supply chains. Consequently, the OFI companies may have a material potential negative indirect impact on workers employed by direct suppliers and on workers engaged in raw material production. At the same time, OFI has an opportunity to exert positive influence on business practices in supply chains through responsible purchasing practices.

Some of the raw materials purchased by the OFI companies come from countries where poverty, weak governance and a lack of robust infrastructure create a risk of inadequate pay, poor working conditions and severe human rights violations, including child labour and forced labour.

Through a risk assessment of suppliers and of geographical and sectoral risks linked to raw materials production, OFI has identified the following human rights challenges as most salient for the company's supply chain engagement, based on an assessment of severity and likelihood:

1) *Child labour*
2) *Forced labour*
3) *Wages below adequate pay*
4) *Injuries or work-related ill-health*

Other inherent human rights risks linked to OFI's supply chain include excessive workhours, irregularities linked to employment contracts and terms, discrimination in wages and limitations to the freedom of organisation and collective bargaining.

OFI pays attention to selecting suppliers who have policies and procedures for responsible business practices, including preventing child labour, protecting worker health and paying adequate wages. All new suppliers are subject to a risk assessment on these topics based on Sedex parameters.

Child labour

OFI carries a risk of being linked to child labour through suppliers and sub-suppliers in certain countries. No specific cases of child labour have been documented in OFI's supply chains in 2025, and most of OFI's direct suppliers are professional companies with robust procedures for responsible business practices. Nevertheless, a general risk of child labour is linked to supply chains of certain raw materials in certain countries.

The Orkla Supplier Code of Conduct states that child labour must be prohibited and prevented, and that suppliers must take the necessary measures to ensure that no child labour occurs at their own production or operating sites or at the production or operating sites of their sub-contractors.

For raw materials with a heightened risk of child labour, OFI aims to purchase certified raw materials or take other relevant actions to prevent child labour. The Rainforest Alliance certification, which OFI uses for cocoa purchases, is an example of a certification standard which incorporates specific guidelines intended to reduce the risk of child labour.

Forced labour

Through the Orkla Supplier Code of Conduct, OFI requires suppliers to prohibit forced labour, involuntary or exploitative prison labour, slavery and human trafficking. Despite posing these requirements on suppliers, an inherent risk of forced labour remains in some supply chains. These supply chains may consist of many sub-contractors, making preventive work challenging.

For raw materials with a heightened risk of forced labour, OFI aims to purchase certified raw materials or take other relevant actions to reduce risk.

Wages below adequate pay

In several of OFI's supply chains there is a risk that workers do not receive a living wage, particularly in connection with agricultural production.

Through the Orkla Supplier Code of Conduct, OFI requires suppliers' pay and social benefits to meet – as a minimum – national legal standards or industry standards, whichever are higher. Pay must be sufficient to cover basic needs and provide some additional, discretionary income. Social benefits must – as a minimum – comply with national legal or applicable industry standards, whichever are higher.

Risk suppliers are requested to perform a self-assessment and/or undergo an ethical audit, which among other topics, addresses adequate wages. Moreover, when purchasing certified raw materials, the OFI companies contribute to improving farmers' income.

Injuries or work-related ill-health

Based on supplier audits and third-party reports, OFI has identified a risk that workers may be exposed to occupational health and safety risks.

The Orkla Supplier Code of Conduct requires suppliers to provide their workers with safe and healthy working conditions, including with regards to protective equipment, drinking water, adequate sanitation, lighting, temperature, ventilation and health and safety training. OFI monitors the requirements through supplier dialogues, requesting suppliers to perform self-assessments and, in some cases, by carrying out ethical audits. When a non-conformance is identified, the affected supplier must create a corrective action plan to eliminate the non-conformance by a clear deadline.

3.2.1. Non-conformances direct suppliers

Through ethical audits of direct suppliers, 22 non-conformances with Orkla's Supplier Code of Conduct were identified in 2025. Non-compliances were observed linked to excessive working hours, inadequate pay for overtime, insufficient social insurance coverage and lack of appropriate canteen facilities. Several gaps were linked to lack of adequate procedures, and it is difficult to know whether the non-conformances have led to actual negative human rights impacts on workers. Examples include no living wage assessment performed and insufficient fire protection equipment.

In accordance with Sedex' procedures for ethical audits (SMETA), plans and deadlines for rectificying identified issues have been agreed with the relevant suppliers. The process for following up non-compliances involves setting a deadline for when the supplier must eliminate the non-conformance and then follow up the supplier to verify that corrective action has been taken.

When serious matters are uncovered through audits, site visits or other means, OFI expects the companies to follow up with the supplier and seek to ensure remediation. In 2025, OFI has, in collaboration with Orkla Procurement, initiated a review of the procedures for supplier risk assessment and mitigation. Improvements to the procedures will be implemented in 2026 through involvement and guidance of OFI's companies.

3.2.2. High-risk raw materials – risks and measures

OFI purchases certain raw materials from regions with a high inherent risk level related to human rights and decent working conditions, low environmental standards and weaker business practices than in more mature markets. In the annual impact assessment and action plan, OFI prioritises impacts based on severity and likelihood and identifies actions to prevent and limit adverse impacts on human rights and decent working conditions.

High-risk raw materials which represent significant spend to Orkla Food Ingredients as a portfolio company are given particular focus. In 2025, the share of prioritised high-risk single raw materials which were certified or addressed through programmes was 77.8%. Risks and measures taken for these raw materials are shown in the table below.

Raw materials	Involvement	Risk issues	Measures
Palm oil	Used as ingredient in some food products, primarily in margarine production.	OFI sources palm oil and palm kernel oil which is produced in Malaysia and Indonesia. The cultivation of oil palms is associated with a risk of deforestation, which entails greenhouse gas emissions and the destruction of natural ecosystems and subsequent biodiversity loss. There is also an inherent risk of violating indigenous people's rights in connection with production in areas of indigenous people. Other inherent risk issues include work safety hazards, child and forced labour and a risk of breaches of other workers' rights.	OFI's goal is for 100% of the palm-based raw materials used for own products to be certified, and the relevant companies within OFI are members of the Roundtable on Sustainable Palm Oil (RSPO). By sourcing RSPO certified palm oil and palm kernel oil, the companies reduce the risk of being linked to deforestation and human rights violations in the value chain. The RSPO programme has established mechanisms for handling complaints and remediating actions. In 2025, the majority of the palm-based products sourced by OFI were RSPO certified (Segregated or Mass Balance). In addition, some OFI companies buy RSPO Credits.
Cocoa	Used as an ingredient in many of OFI's bakery and ice cream products.	The cocoa sector in West Africa, particularly in Côte d'Ivoire, faces serious challenges in the form of poverty, low productivity, human rights violations and environmental degradation. Serious issues such as child labour, deforestation and soil depletion are linked to underlying causes such as poverty, low cocoa prices, inadequate infrastructure and weak regulatory authorities.	OFI sources cocoa and chocolate products from key suppliers who have policies for responsible cocoa production and who engage in trying to solve the challenges linked to this production. Many of the companies within OFI are buying certified cocoa, and the most common certification body is Rainforest Alliance (RA). The RA programme carries out training of farmers and has established mechanisms for complaints-handling and remediating action. In 2025, more than half of the cocoa and chocolate products sourced by OFI for own products were certified.
Nuts and seeds	Nuts and seeds are used as ingredients in many of OFI's bakery and sweets products	Growing hazelnuts can be linked to challenges such as low productivity, sub-standard working and living conditions for seasonal workers and instances of child labour. The biggest challenges related to cultivation are found in areas around the Black Sea.	OFI and Orkla Procurement are having regular dialogue with the suppliers of nuts and seeds about risk issues. OFI aims for all purchased hazelnuts, pumpkin seeds, flaxseeds and sesame seeds for own products to be produced in

Orkla Food Ingredients

		OFI's main suppliers of pumpkin seeds are Chinese, and the seeds are grown in Inner Mongolia. The harvesting is done with the use of machines, still there is an inherent risk of being involved in human rights violations when sourcing from China. OFI sources sesame seeds cultivated in Nigeria, India and Turkey. These countries are linked to an inherent risk of human rights violations, including the risk of child and forced labour.	accordance with standards which meet the silver-level of the Farm Sustainability Assessment (FSA) tool developed by the SAI Platform (Sustainable Agriculture Initiative). For hazelnuts, OFI plans to increase the purchase of RA-certified raw materials. For pumpkin seeds, OFI aims to buy FSA-verified raw materials for own products as the availability of such raw materials increases. For sesame seeds, there are currently no certifications available. OFI and Orkla Procurement require tier-1 suppliers to register on the Sedex platform for risk assessment and information sharing and actively engage with them to ensure that the suppliers have processes for risk mitigation which cover their sub-suppliers.
Coconut	Coconut oil and coconut flakes are used as ingredients in some of Orkla Food Ingredients' confectionery and sweet products.	The main part of coconut purchased by OFI is grown in Thailand, the Philippines and Indonesia. The production involves smallholder farmers, and there is an inherent risk of poor working conditions, safety hazards, child labour and other potential negative human rights impacts.	OFI aims to buy certified coconut-based raw materials for own products as the availability increases and price gaps are reduced.
Tomatoes	Tomato puree is used in a number of OFI products.	OFI aims to source tomatoes and tomato-based products from suppliers in countries with a low risk of adverse impacts on human rights and decent working conditions, but some purchases have been made from high-risk regions, including the Xinjiang province in China. This province has attracted international attention due to reports of human rights abuses against Uyghurs and other Muslim minorities in the region.	Orkla Procurement has implemented close monitoring of high-risk suppliers of tomato products. As part of the risk management, Orkla Procurement conducts its own on-site inspections in addition to the on-site and documentation-based inspections conducted by Sedex-approved auditors based on the SMETA framework. These inspections have focused on human rights and decent working conditions in general, as well as on forced labour specifically. In 2025, OFI renegotiated long-term supplier contracts for tomato products and as part of that made sure that the risk of forced labour and other severe human rights violations is minimised. The company stopped any sourcing from the Xinjiang province and started instead sourcing from Inner Mongolia.

			In 2025, OFI visited the relevant supplier of tomato paste in Inner Mongolia to monitor working conditions, recruitment practices, traceability, quality and food safety. The visit included factory and field inspections, document reviews and interviews with both permanent and seasonal workers. Human rights risks associated with the region will be addressed through further roll-out of the Supplier Code of Conduct, external audits (SMETA), and close dialogue with the suppliers.

4. Whistleblowing and complaint mechanisms

Orkla's Whistleblowing Policy sets out requirements governing the submission, receipt and handling of whistleblowing reports, and prohibits retaliation against whistleblowers in accordance with the EU Whistleblower Protection Directive. These requirements apply to all Orkla companies and reflect the provisions of the Whistleblower Protection Directive and the Norwegian Working Environment Act.

The whistleblowing systems implemented by Orkla and Orkla Food Ingredients encourage internal and external stakeholders to report actual and potential breaches of laws and regulations, the Orkla Code of Conduct and generally accepted ethical standards.

Orkla operates a centralised whistleblowing mechanism which all group companies and all internal and external stakeholders can use. This mechanism comes in addition to mechanisms established by the local OFI companies. Orkla's centralised whistleblowing mechanism, which is provided by an external supplier, is available 24 hours a day in all relevant languages and ensures whistleblower anonymity. The law prohibits all forms of retaliation against persons who submit, in good faith, whistleblowing reports concerning possible censurable conditions.

Through the Orkla Supplier Code of Conduct, OFI's suppliers and business partners are required to establish complaints mechanisms which take account of the UNGP guidelines. Some of the certification organisations with which OFI collaborates have established complaint and remediation mechanisms with a presence in high-risk supply chains, for example those relating to palm oil (Roundtable on Sustainable Palm Oil) and cocoa (Rainforest Alliance). These third-party organisations are a valuable supplement to OFI's own whistleblowing/complaints-handling mechanisms.

OFI does not have a systematic approach for assessing whether workers in the value chain are familiar with, and trust, complaint mechanisms established by the companies, their suppliers and/or business partners. Stakeholder dialogue has been identified as an area for improvement in the period 2025-2027.

5. Actions taken in 2025 and plans for 2026

As a consequence of new legislation and Orkla Food Ingredients' transition from a business area to a portfolio company, OFI has reviewed and strengthened the company's governance procedures related to sustainability and responsible business practices in the period after 2023. The efforts to ensure robust ESG governance procedures continued in 2025 with satisfactory progress. Among others, OFI prepared a Sustainability Policy (see section 2.1) and internal guidance material on human rights due diligence. OFI also established an internal ESG Board to further strengthen ESG governance, see section 2.1.

Orkla Food Ingredients

In 2025, OFI prepared a Double Materiality Assessment (DMA) to identify and prioritise impacts, risks and opportunities linked to environmental, social and governance topics, and the human rights impact assessment provided important input to the DMA. Long-term targets were established for all material topics, including targets linked to own workforce and responsible sourcing. OFI requires that the companies in 2026 prepare plans for how to contribute to these targets, and OFI has initiated a process to guide and support the companies in this work.

5.1 Own workforce

In 2025, OFI implemented a revised and improved format for the Leadership and Organisational Process (LOP). This is an annual process for evaluation of management teams and of the needs for short term and longer-term organizational development and for planning how to develop future leadership and organisational capacity. The structured LOP process has been implemented by around 90% of the companies.

OFI also implemented various measures to promote occupational health and safety, wellbeing and positive working conditions for own workforce, focusing on areas such as adequate wage, equal pay, workplace inclusion, safety and injury prevention, training and skills development. These are described in the table below.

Topic	Key actions 2025	Results
Occupational health and safety	Several meetings and training sessions have been organised for Orkla Food Ingredients' internal health & safety network. Focus topics in 2025 have been reporting of injuries as well as a review of roles and responsibilities.	The sessions in OFI's health & safety network have contributed to improved reporting and follow up of injuries and more generally, to learning and competence sharing across the OFI companies.
	OFI has prepared a self-assessment tool for identifying areas of improvement. The tool is based on the requirements of the Orkla EHS Standard. In 2025 the tool has been tested through a pilot project in OV Sweden, and four additional pilot projects are planned for 2026.	The tool contributes to a more systematic gap analysis and increased competence.
	OFI encourages all companies to carry out Health & Safety days as part of the continuous efforts to build internal awareness. In 2025, Health & Safety days were organized at more than 24 sites with topics such as stress management and risk assessments, in addition to safety and fire prevention drills.	The Health & Safety days contribute to broad awareness of health and safety risks, better knowledge of internal procedures and general engagement.
Adequate wage	OFI wants all employees to receive fair wages, and in 2025, OFI paid attention to employees' increased cost of living as part of the annual pay adjustments.	OFI's adequate wage assessment in 2025 showed that no employees are paid wages below the external benchmark for adequate wage (WageIndicator).
Equal pay	OFI wants to eliminate gaps in compensation between men and women which is not based on relevant compensation criteria, and in 2025, OFI introduced a strategic target of reducing the gender pay gap, measured by the ESRS reporting guidelines, to maximum 5%. As part of the annual salary adjustment process, OFI asked all companies to address wage discrepancies between men and women.	The long-term target and wage instructions have contributed to increased awareness among company management teams and has provided a basis for more systematic follow-up of the companies.
Inclusion and diversity	Orkla Food Ingredients is committed to fostering a diverse, equitable, and inclusive workplace. Several activities have been carried out by the local companies in 2025, including training programs and leadership engagement aimed at reducing equity gaps, promoting inclusivity, and building awareness around diversity.	OFI's internal engagement over several years through training and network activity has led to increased awareness and more people-oriented leadership. The employee survey carried out in 2025 showed a positive score on employees' experienced inclusion.

Learning and development	In 2025, OFI established an internal procurement network for learning and collaboration and strengthened the networks for health & safety, sustainability, people & culture, operations and digital. In 2025, Orkla Food Ingredients launched a new senior leadership program and continued its program for emerging leaders with a new class. The first class consisted of 25 leaders from the OFI companies. In addition, a new on-boarding program for new leaders was developed which will be launched in 2026.	The networks represent important arenas for dialogue and collaboration and have contributed to increased efforts in prioritized areas. OFI has received positive feedback on the new senior leadership program which will be offered to more leaders in 2026.

As part of Orkla Food Ingredients long-term human rights impact plan, the following actions have been defined for the strategy period 2026-2027:

Occupational health and safety (OH&S)

- Continue incident monitoring, reporting and follow-up. Further improve analyses of root-causes and digitalization of processes. Increase focus on near-misses and potentially severe injuries. Introduce a system for red flag alerts
- Implement Orkla EHS Standard v. 4.0. Develop a Playbook for occupational health and safety outlining key principles and key practices, and implement BU self-assessment
- Continue building a safety culture through awareness training and annual health and safety days

Fair, inclusive and engaging workplace

- Carry out structured gender pay gap and adequate wages assessments and prepare plans to close wage gaps and achieve gender balance in management teams

A culture of growth and opportunity

- Prepare a framework for strategic competence development and facilitate learning through internal networks, training programs and an enhanced system for continuous performance and career development

5.2 Workers in the value chain

OFI has also continued the work to ensure responsible working conditions in supply chains, including systematic risk assessment and enrolment of tier-1 suppliers to the Orkla Supplier Portal. OFI works towards the long-term target that prioritised high-risk raw materials used for own products should be purchased from certified producers or covered by other risk-mitigating measures. In 2025, OFI and Orkla Procurement have initiated a review of the processes for responsible sourcing with an aim of further strengthening risk assessment and mitigation.

The measures taken to address human rights risks linked to raw materials production are described in section 3.3.

As part of Orkla Food Ingredients long-term human rights impact plan, the following actions have been defined for the strategy period 2026-2027:

- Continuing the implementation of procedures for risk assessment and follow-up of direct suppliers, including enrollment of suppliers to the Supplier Portal and improved procedures for monitoring supplier progress
- In collaboration with Orkla Procurement plan and implement program for engagement with selected suppliers to encourage actions on key human rights topics
- Develop a structured approach to prevent and mitigate human rights violations for prioritised high-risk raw materials with a focus on preventing child and forced labour

In 2026, OFI will also provide guidance to the companies on human rights due diligence and review the policy and procedures for supplier and raw material management.

Orkla Food Ingredients

***

(signatures on next page)

Orkla
Food
Ingredients

23 June 2026

The Board of Directors of Orkla Food Ingredients AS

Øyvind Andreas Torpp
Chairman of the Board

Marianne Kirkegaard Knudsen

Joshua Marcus Pollack

Patrick Christopher Mundt

Per Håvard Skiaker Mælen

Ingvild Flaa

Marte Helene Sølvsberg

Erling Dissing Rasmussen

Geir Ferreira Engelbrethsen

Johan Anders Björn Clarin
CEO Orkla Food Ingredients