

Policy Statement on OSI's Human Rights Strategy



This Policy Statement was released by the Executive Board of OSI Foods GmbH & Co. KG on behalf of its majority-owned subsidiaries in Europe ("OSI")*.

Our Commitment

We are proud to be part of the OSI Group. As one of the largest privately held companies in the U.S., with more than 20,000 employees worldwide, we are dedicated and passionate innovators, producing food solutions that connect people, families and communities across the globe.

At OSI, we are deeply committed to upholding human rights and environmental standards throughout our operations and supply chains. OSI faces the challenge of a globally networked procurement and sales market as global supply chains have become increasingly complex and span different regions and environments. OSI is aware of its responsibilities in the areas of human rights, the environment and animal welfare.

This Policy Statement supplements and specifies the requirements together with our [Human Rights Policy](#), the [Global Business Standards](#) and our [OSI Supplier Code of Conduct](#).

- 1. Respect for Human Rights** We consider the protection of human rights to be a key element of our corporate responsibility. Our dedication to respecting human rights is based on the United Nations "Universal Declaration of Human Rights" and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, as well as relevant international conventions and principles. We categorically oppose any form of forced labor, child labor, discrimination and other human rights abuses.
- 2. Environmental Protection** We recognize our responsibility to protect the environment and are committed to minimizing our ecological footprint. This includes adherence to environmental regulations, the sustainable use of resources and the prevention of environmental harm within our supply chain.
- 3. Stakeholder Engagement** We engage in meaningful dialogue with our stakeholders to understand their perspectives and concerns. This collaborative approach helps us to identify and address human rights and environmental risks effectively. We expect that our employees, business partners and suppliers adhere to all applicable laws and support our defined values. These expectations are reflected in our Global Business Standards and OSI Supplier Code of Conduct, respectively binding for our employees or agreed to by our suppliers as a binding remedial or preventative measure.



Our Core Values

ACT WITH INTEGRITY

PUT PEOPLE FIRST

STEWARD OUR RESOURCES FOR
FUTURE GENERATIONS

SEEK PARTNERING RELATIONSHIPS

STRIVE TO CONTINUOUSLY IMPROVE

EXPLORE INNOVATIVE SOLUTIONS

WORK TOGETHER AS A TEAM

4. Training and Capacity Building We provide training and resources to our employees and business partners to ensure a thorough understanding of our commitments, values and responsibilities throughout the entire supply chain. This empowers them to contribute to our due-diligence efforts and uphold our standards.

5. Grievance Mechanisms We have established known, accessible and effective grievance mechanisms for stakeholders to report potential human rights or environmental violations related to our supply chain. These mechanisms ensure that grievances are addressed promptly and appropriately. OSI developed a Complaints Procedure Process for its employees as well as other potentially affected persons. Suspicions and incidents that indicate a violation of human rights and environmental regulations can be reported anonymously through the reporting platform – our [OSI MAKE IT RIGHT Hotline](#). Whether relating to OSI’s own field operations or to OSI’s supply chain (direct and indirect suppliers), both internal and external individuals, are able to confidentially provide information on risks to, and breaches of, human rights and environmental obligations via our Complaints Procedure Process.

6. Risk Analysis We have implemented robust due-diligence processes to identify, prevent, mitigate and address potential adverse human rights and environmental impacts associated with our business activities. OSI works at every company level to identify and assess risks in the supply chain and in our own business areas. This includes both centralized and decentralized functions and departments such as Sustainability, Supply Chain, Quality, Legal and Human Resources. We have implemented a multi-stage risk-analysis process to evaluate product and site-related risks subject to regular review and event related, as required.

Internal Analysis: OSI has defined an evaluation procedure for its European-based production and office-site locations. This includes a comprehensive questionnaire, which is used to identify the risks in all individual areas of work and assess the probability of occurrence and severity of injuries. By involving the individual specialist of relevant areas, the experiences of those affected can be included in the analysis.

OSI identified very low risks within OSI’s own business area. Only sensitive areas include occupational health and safety risks. We have jointly defined preventive measures like European Health & Safety policies, e.g., Environmental Health & Safety (EHS) Training Standard, accident investigation and reporting process, hazardous material process, best practice sharing. Impulses like Environmental Week, Safety Week and Values Action Days provide our teams with a comprehensive understanding of how we integrate our core values into everyday business activities.

External Analysis: In a first step, all suppliers are assessed according to their locations (country) and product categories. These assessments and ratings are based on publicly available indices on human rights and environmental aspects. OSI’s external risk analysis revealed an overall low to medium risk for suppliers; no high-risk suppliers could be identified. Sensitive areas with associated medium risks are primarily based on the purchase of raw materials and products outside of Europe:

- Labor conditions
- Discrimination
- Health & Safety
- Environment

Suppliers with medium risks may be subjected to a more detailed analysis and additional sources of information are validated (e.g., through specific questionnaires). If the risk analysis identifies a higher risk and prioritizes a supplier accordingly, the supplier is not used or individual risk-reduction action plans would be developed for each supplier demonstrating that increased risk. Preventative measures also include a commitment from all suppliers to abide by (or adhere to) our OSI Supplier Code of Conduct. Our dedicated purchasers in our supply chain are involved as necessary. The results of a risk analysis are also considered in the process of supplier selection through our Purchasing Policy.

- 7. Transparency and Reporting** We commit to transparency in our due-diligence activities. This includes regular reporting on our efforts and progress requirements. We will communicate openly with our stakeholders, including employees, suppliers, customers and the public, about our due-diligence practices and findings.

OSI considers the protection and defense of human rights, the environment and animal welfare to be central concerns of its business activities, as outlined in the Steward Our Resources for Future Generations section of our [company values](#). We take decisive action against human rights violations and environmental risks and we expect our suppliers to do the same.

Gersthofen, December 2024

*This Policy Statement is available in multiple languages