# EU CODE OF CONDUCT ON

## **RESPONSIBLE FOOD BUSINESS AND MARKETING PRACTICES**

### **TEMPLATE FOR COMPANIES**

#### PAULIG

#### 27.4.2022

Type of business/sector	Sustainability dimension	Code aspirational objective	Individual commitments with baseline	Progress on KPIs and goals (qualitative and/or quantitative)	Additional information (optional)	Comments (optional)
(E.g. retail,	(E.g.					(E.g. enablers, ideas
dairy)	environmental, social)	(1-7)			(E.g. partnerships, geographical coverage, sharing	on how to improve)
					best practices, links with other COM initiatives, with other reporting initiatives)	
food & beverage	economical and social	1	By 2030, 70% of our net sales come from products and services which enables health and wellbeing of people and	nutrition framework to define what we mean by "a product enabling health for people".	Our product portfolio is almost 100% plant- based today, and we will continue to	The European Commission aims to put forward a proposal of
			planet (baseline year 2019).	The framework was completed during 2021, and it has paved the way for evaluating current status, continuous monitoring	develop our products in a healthier direction as well as innovate new	harmonised mandatory front-of- pack nutrition labelling, and develop

and development of our product portfolio. The good for both people and the planet.nutrient profiles a prerequisites for using nutrition and health claimsand the creation of focus areas and the creation of an realize our health ambition by 2030.Next, to realize our ambition 2030, wePaulig has an ambitious	or
framework helped us in identification of focus areas and the planet.and the planet.using nutrition and health claimsand the creation of an overarching roadmap to realize our health ambition byNext, to realize our ambition 2030, we will move on toPaulig has an ambitious	
identification of focus areas health claims and the creation of an Next, to realize our overarching roadmap to ambition 2030, we Paulig has an realize our health ambition by will move on to ambitious	and
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overarching roadmap to realize our health ambition byambition 2030, we will move on toPaulig has an ambitious	
realize our health ambition by will move on to ambitious	
2030. developing a sustainability ager	
	genda,
framework to one ambition beir	eing
evaluate and identify that 70% of the sa	sales
For us it is important that our focus areas enabling shall come from	1 I
definition for "a product health for the planet. products enabling	ng
enabling health for people" is health for people	le and
based on and aligned with Alongside aiming to the planet by 2030	030.
scientific evidence and systematically reduce Thereby we welco	lcome
authority recommendations, the environmental and support the	2
and that we have a means for footprint of our Commission's	
proper or reliable guidance in products and ambition of	
our work towards our inspiring consumers harmonized front	nt-of-
ambition. For that, we created to opt for sustainable pack nutrition	
a nutrition framework through choices, we take labelling to help a	and
which we can evaluate our food safety and enable consumers	
entire portfolio of food and quality with the make healthy food	bod
mixed drinks. utmost seriousness. choices. Paulig	
endorses Nutri-Sc	Score
Paulig's nutrition framework is thanks to its dyna	namic
based on the front-of-pack model and	
nutrition label Nutri-Score, transparent and	t l
which is developed by intuitive approach	
independent researchers. The while also	-
label is today the most widely acknowledging	
used nutrition label in the EU, following areas of	of
and also endorsed by the development with	

World Health Organisation's	the Nutri-Score
International Agency for	model:
Research on Cancer (IACR) and	
	1) acknowledge
the European Consumer	all healthy
Organisation (BEUC). Nutri-	foods as
Score includes well-established	healthy,
nutrients and food groups	yeilding
known to affect health to be	"healthy
utilised in evaluating products.	points" in the
In Paulig's nutrition	healthy food
framework, the criteria are	parameter
further developed to align	2) further
even better with dietary	development
recommendations and account	of the drinks
for all type of foods that may	category,
contribute to the development	providing
of food products that enable	proper
health for people. In addition	comparisons
to the original Nutri-Score	in relation to
parameter for healthy foods	their
i.e., fruit, vegetables, herbs,	nutritional
legumes, nuts, and olive,	quality.
rapeseed and walnut oils, we	
also include seeds, pure spices,	
whole grains and grind or	
flours of foods defined as	
healthy, in Paulig's nutrition	
framework.	
Once EU the decision on	
harmonized FOPNL is finalized,	
we will review Paulig's	

				nutrition framework for alignment. With regard to the Code, our KPI has been defined as "Share of products enabling health", and currently, 49% of Paulig's net sales comes from products that enable health for people (calculated based on Paulig's nutritional framework).		
food & beverage	environmental	3	By 2030, 80% less GHG emissions from own operations and 50% less GHG emissions in our value chain from 2018 baseline.	With regard to the Code, our KPI has been defined as "GHG emission reductions". This far, we have reached 18% GHG emissions reduction in our own operations from the 2018 baseline. In own operations, our target is to have 100% of our production sites CarbonNeutral® certified by 2023. In April 2022, Paulig has in total eleven production sites in Finland, Sweden, Estonia, UK, Belgium and Spain. Thusfar, we have achieved CarbonNeutral® building certification for six of our 11	Paulig's climate targets are aligned with the Paris agreement of 1.5 degrees scenario, and they have been approved by the Science Based Targets Initiative. Paulig's greenhouse gas emissions for 2021 (Scopes 1–3) have been verified by an independent third-party assurance provider. The assurance statement can be found in Paulig Annual report 2021.	We acknowledge that we are on a journey that we cannot tackle alone. Therefore, we will continue to work with our suppliers and partners to adopt climate-smarter farming practices, find solutions for logistics networks optimization, and look for new and more sustainable raw materials to reach our ambitious climate targets.

production sites, and the work continues in 2022.in early 2022, we published the Paulig Deforestation Policy where we commit to working collaboratively to electricity and district heating. With these initiatives, emissions from factories have been cut by 98% since 2014. The remaining emissions have been offset by forest projects.Deforestation Policy working collaboratively to eliminate commodify-related deforestation from our supply chains as part of our sustainability approach.Along with our climate ambition, we have been offset by forest projects.Along with our climate ambition, we have committed to work towards clicularity and have set a target that all our packaging will be recyclable and made from renewable or recyclable and made from our value chain, most notably linked to the agricultural production of raw materials that we use in our we are also			
To make the factories carbon neutral, Paulig has for example invested in energy efficiency, heat recovery and switched to buying biogas, renewable electricity and district heating. With these initiatives, emissions from factories have been cut by 98% since 2014. The remaining emission have been offset by forest projects. Based on a screening of the climate impacts of Paulig's entire value chain, we know that our own operations constitute only about 3% of Paulig's total GHG emissions, while most emissions derive from our value chain, most notably linked to the agricultural production fraw materials that we use in our		production sites, and the work	
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materials that we use in our We are also		notably linked to the	2030.
		agricultural production of raw	
		materials that we use in our	
products. committed to the		products.	
global challenge of			
For now, our value chain reducing food loss,		For now, our value chain	_
emission reduction focuses on and our target is to		emission reduction focuses on	-
wheat and coffee supply reduce food loss in		wheat and coffee supply	reduce food loss in

1				
		chains. We work with our	our value chain by	
		suppliers and partners to	50% by 2030. In	
		adopt climate-smarter farming	cooperation with	
		practices. For example, in	Helsinki Centre of	
		2021, we initiated a	Sustainability	
		sustainable farming	Science, Paulig	
		partnership with Swedish	conducted in 2021 a	
		agricultural cooperative	theoretical study on	
		Lantmännen. The wheat flour	food loss potential	
		supplied by Lantmännen to	on our value chain.	
		Paulig will cover the annual	The study helped us	
		baking of 400 million Santa	understand the main	
		Maria tortillas, and will hold up	reasons behind the	
		to 30% less GHG emissions per	food loss in the	
		unit of volume. Furthermore,	production of many	
		we currently evaluate emission	of our raw materials	
		reduction potentials in coffee	such as coffee, wheat	
		origin countries, in	and spices.	
		collaboration with our green		
		coffee suppliers.		
		Furthermore, we are working		
		in reducing logistics-related		
		emissions by 25% by 2025, in		
		collaboration with our		
		different logistics suppliers.		
		We have not yet achieved		
		absolute reductions in our		
		value chain GHG emissions		
		compared to the baseline in		
		2018. Our absolute Scope 3		
		emissions increased by 6% in		
1				

				2021 compared to the 2018 baseline. The emission increase is linked to growth in our sales as well as recalculation of the end-of-life treatment of sold products with more accurate data. However, the emission intensity for Scope 3 (tCO2/tonne produced) has reduced by 5%. We expect our value chain emission reduction initiatives will start to impact in 2022 onwards.		
food & beverage	social	7	By 2030, 100% of raw materials from high-risk areas come from sustainable sources verified by external parties (baseline year 2019).	Approximately 40% of Paulig's raw materials come from countries that are classified as high-risk areas by amfori BSCI. In 2021, we have defined a basket of standards and verifications accepted by Paulig and a plan for the external verifications. 100% of Paulig's green coffee is already sourced from externally verified sustainable sources since 2018, representing almost 80% of the total high-risk area share. Now, we aim to extend this work to cover also other raw	To reach our goal, we need to make sure we have suppliers that share our values and have the capability to support our ambitions – and focus on building external verifications.	Paulig welcomes the EU's efforts to introduce a new mandatory human rights due diligence, as part of the overall sustainability corporate governance proposal. Mandatory human rights due diligence would foster the necessary transformation towards respect for human rights across different sectors and ensure that efforts by

materials. This will require	companies are not
more systematic due diligence	undercut by the lack
process and a holistic way of	of a uniform standard
working with our suppliers and	of conduct. We
other partners (e.g. civil	consider that the
societies) throughout	legislative proposal
our value chain.	should apply to all
	businesses so that
In 2021, we put focus on the	human rights would
external verification of	_
	be respected in entire
sustainability in our spice value chains which is the second	operations and
	supply chains as
biggest sourcing category from	global value chains,
high-risk areas. During 2021,	and that focus of the
we created detailed, spice-	regulation should be
specific roadmaps for our top	on companies to
3 spices – black pepper, onion	build strong due
and Indian chilies – to start	diligence processes.
with. The goal for these top	Our view is that the
three spices is to have 100% of	regulation should be
the sourced volumes from	based on the existing
externally verified sustainable	international
sources by the end of 2023. In	standards, the
2021, 32% was already	principles defined by
achieved.	the UN, ILO and
	OECD, and companies
At the same time, we continue	should be given a
to develop mid-term	certain flexibility in
roadmaps for our whole spice	choosing the means
category. We collaborate with	and tools.
other industry representatives	Furthermore, the
in the Sustainable Spices	expectations must be
Initiative and among the	clear and defined,

	amfori BSCI community, promoting multi-tier audits and mutual learning. The roadmaps for our next raw materials are ready to be started in 2022. With regard to the Code, our KPI has been defined as "Share of sustainably sourced raw materials from risk countries verified by external parties". In relation to Paulig coffees the level is 100%, and with regard to Paulig's top 3 spices, the figure is currently 32%.	supported with a proper monitoring and enforcement mechanism. In addition to legislative measures, also other forms of cooperation and engagement should be incentivised.
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