



Compliance Report 2024 for Hoogwegt Group and underlying entities on the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Prepared by Querijn Evers, Hoogwegt Group Compliance Officer

This report provides an overview of the actions taken by Hoogwegt to comply with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act)*.

This report includes Hoogwegt Group and its principal subsidiaries:

Percentage	Name
100	Hoogwegt International B.V., Arnhem
100	Havero Hoogwegt B.V., Arnhem
100	Hoogwegt Cheese B.V., Arnhem
100	Hoogwegt Milk B.V., Arnhem
100	Hoogwegt Trade Management B.V., Arnhem
100	Meelunie B.V., Amsterdam
100	Meelunie America Inc., Detroit (USA)
100	Seabird International Shipping N.V., Antwerp (Belgium)
100	Pacific Dairy Ingredients (Shanghai) Co., Ltd., Shanghai (China)
100	Hoogwegt Singapore Pte. Ltd., Singapore
100	Hoogwegt Australia Pty. Ltd., Geelong (Australia)
100	Hoogwegt Poland Sp. z o.o., Warsaw (Poland)
100	Hoogwegt Holding Corporation, Lake Forest (USA)
100	Hoogwegt U.S., Inc., Lake Forest (USA)
100	Hoogwegt Latinoamérica S.A.S., Buenos Aires (Argentina)
100	Sarl Rumi, Rungis (France)

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* requires all Canadian companies and foreign companies that supply into Canada that have assets of at least \$20 million or annual revenue of at least \$40 million to report annually on the measures they have taken to prevent and address forced labour and child labour in their domestic and global operations and supply chains. Hoogwegt is a global dairy company that operates in 130 countries and employs 450 FTE worldwide. Hoogwegt sources its raw materials and products from various suppliers and partners around the world. The potential risk for Hoogwegt relating to Forced Labour and Child Labour exist mainly in the supply chain.

[We add vision & value.](#)

Hoogwegt Group B.V.

P.O. Box 6, 6800 AA Arnhem
Amsterdamseweg 60
6814 CP Arnhem
The Netherlands

T +31 (0)26 38 84 802
E mail@hoogwegtgroup.com
W www.hoogwegt.com

IBAN NL75 INGB 0668 6336 38
BTW/VAT I.D.-nr NL006519805B01
Chamber of Commerce 10037251



Hoogwegt is committed to respecting and protecting the human rights of its employees, suppliers, and partners, and ensuring that its operations and supply chains are free from forced labour and child labour.

To comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act, Hoogwegt has taken the following measures:

1. Adopted a **Code of Conduct**, including a Human Rights Paragraph, that outlines the company's commitment and responsibility to respect and protect human rights, and to prevent and address forced labour and child labour in its operations and supply chains. The Code of Conduct is published on the company's public website.

The Human Rights paragraph in our Code of Conduct outlines the company's commitment and responsibility to respect and protect human rights, and to prevent and address forced labour and child labour in its operations and supply chains.

The Code of Conduct covers the following Forced Labour related aspects:

- The scope and applicability of the policy, which applies to all employees, suppliers, and partners of the company, and to all activities and decisions of the company.
- The expectations and requirements of the policy, which include complying with all applicable laws and regulations of the countries where we are located, respecting and upholding the human rights of all individuals and groups, and avoiding and remedying any adverse human rights impacts.
- The commitments and actions of the policy, which include conducting human rights due diligence, implementing a human rights grievance mechanism, engaging and consulting with stakeholders, providing training and awareness-raising programs, monitoring and reporting on human rights performance, and reviewing and updating the policy periodically.
- The roles and responsibilities of the policy, which include assigning and delegating the authority and accountability for the implementation and oversight of the policy to different levels and functions of the company, such as the board of directors, the senior management, the compliance department and the team of confidants.
- The Code of Conduct was developed through a consultative and participatory process, involving various internal and external stakeholders, such as employees, suppliers, partners, governments, civil society, and international organizations. The Code of Conduct was approved by the board of directors, signed by the CEO, and communicated to all employees, suppliers, and partners, and is periodically reviewed and updated. The Code of Conduct is also publicly available on the company's website and in other languages.

The Code of Conduct has been effective and influential in guiding and shaping the company's human rights strategy and culture, and in demonstrating the company's leadership and commitment to human rights. The Code of Conduct has also helped to raise the awareness and understanding of human rights among the employees, suppliers, and partners, and to foster a sense of responsibility and accountability for human rights.



Employees are trained regularly on different topics of the Code of Conduct, and annually confirm their adherence to the standards in the Code of Conduct. This training includes Human Rights topics, and awareness on Compliance in the supply chain.

2. Implemented a **human rights grievance mechanism**, as part of the general Whistleblower policy, that provides a safe and accessible way for employees, suppliers, partners, and stakeholders to raise and resolve any concerns or complaints related to forced labour and child labour in the company's operations and supply chains.

The human rights grievance mechanism is a mechanism that provides a safe and accessible way for employees, suppliers, partners, and stakeholders to raise and resolve any concerns or complaints related to forced labour and child labour in the company's operations and supply chains. The human rights grievance mechanism is based on the principles and criteria of the UNGPs and is consistent with the company's Code of Conduct and is periodically reviewed and updated.

The human rights grievance mechanism covers the following elements:

- The scope and purpose of the mechanism, which applies to any allegation or suspicion of forced labour and child labour in the company's operations and supply chains and aims to provide an effective and efficient remedy for the affected individuals and groups.
- The process and procedures of the mechanism, which include the submission, acknowledgement, investigation, resolution, and follow-up of the grievances, and the roles and responsibilities of the different actors involved, such as the complainants, the respondents, the group compliance officer, the confidants, and external mediators or arbitrators.
- The standards and safeguards of the mechanism, which ensure that the mechanism is legitimate, accessible, predictable, equitable, transparent, rights-compatible, and dialogue-based, and that the mechanism respects and protects the confidentiality, anonymity, and security of the complainants and the respondents.

The report concludes that Hoogwegt has made significant progress and achievements in complying with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and in advancing its human rights performance. The report also identifies some challenges and gaps that the company needs to address and improve and provides some recommendations and action plans for the next reporting period.

Arnhem, May 15, 2024

Sander Hulsebos
CEO Hoogwegt Group