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# **SUSTAINABILITY POLICY**

## **MIDSONA GROUP 2025**



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## **1 BACKGROUND AND PURPOSE**

1.1 Midsona is driven by the mission to provide healthy food for people and planet and is committed to sustainable development by integrating material environmental, social, and governance (ESG) considerations into all aspects of the company's operations and value chain. This policy ensures compliance with applicable laws and regulations, while reflecting Midsona's values and long-term ambitions related to these considerations. Midsona is also adhering to a number of international initiatives and principles, including the following:

- i. UN Global Compact and UN Guiding Principles on Business and Human Rights
- ii. OECD Guidelines for Multinational Enterprises and OECD Due Diligence Guidance for Responsible Business Conduct
- iii. UN Sustainable Development Goals
- iv. Science Based Targets Initiative

1.2 This policy forms part of Midsona's policy framework and should be considered complementary to other policies guiding sustainability efforts, including Midsona's Code of Conduct and Supplier Code of Conduct. In addition to this policy, Midsona is developing procedures and guidance to provide further detail and practical support for operationalising the policy.

1.3 The policy also establishes clear roles and responsibilities and provides the foundation for how sustainability is embedded across the organisation.

1.4 Midsona's ESG considerations are defined through the organisation's Double Materiality Assessment (DMA) identifying the most significant impacts, risks, and opportunities (IROs) related to ESG. The results of the DMA are embedded in the business strategy and risk procedure, ensuring that material sustainability-related impacts, risks and opportunities are systematically assessed, managed, and reported.

## **2 POLICY ROLES AND RESPONSIBILITIES**

### **2.1 Authorised approver**

The Board of Midsona is the authorised approver of the Sustainability Policy and



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oversees its implementation. Exceptions to this policy are not allowed, unless otherwise approved by the Board of Midsona.

## 2.2 **Appointed owner**

Appointed owner of this policy is responsible for:

- i. Stakeholder engagement
- ii. Defining methods of communication
- iii. Ensuring relevant training of this policy content
- iv. Monitoring of this policy

## 2.3 **Target Group**

The sustainability policy covers the operations of Midsona's companies in all Midsona's operating countries. Midsona's employees must comply with the policy. Midsona's companies and units are responsible for implementing the policy and for ensuring sufficient resources in their operations.

## **3 MONITORING AND REVIEW**

### 3.1 **Monitoring**

Compliance with and relevance of this policy are monitored through regular assessments. Progress is disclosed in line with ESRS requirements. The policy is reviewed annually by the Chief Sustainability Officer to ensure it remains aligned with regulatory developments, stakeholder expectations, and Midsona's strategic priorities.

### 3.2 **Violations of this policy**

3.2.1 Any observed or suspected breaches of Midsona's Sustainability Policy should be reported without delay. There are several ways to raise a concern:

- i. Alternative 1: Contact a supervisor or manager within our organisation.
- ii. Alternative 2: Contact any member of the Whistleblowing Team, comprising the Chair of the Board and the Director Legal.
- iii. Alternative 3: Submit an anonymous or confidential report through



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Midsona's whistleblowing communication channel:  
<https://report.whistleb.com/midsona>

3.2.2 If Midsona is associated with serious and/or systematic violations of this Policy, laws, regulations or international norms for ethical behaviour, actions will be taken to mitigate adverse impacts.

#### **4 SUSTAINABILITY GOVERNANCE AT MIDSONA**

##### **4.1 Sustainability Governance Roles and responsibilities**

4.1.1 Midsona is committed to strong corporate governance and clear Board oversight of sustainability matters. The Board of Directors (BoD) approves Midsona's double materiality assessment as well as the Group's sustainability policies, targets, and reporting. The Audit Committee acts as a preparatory and advisory body to the BoD. It supports the Board in matters relating to sustainability reporting, including oversight of reporting processes and monitoring of the company's internal controls.

4.1.2 The CEO of Midsona is responsible for managing material sustainability topics and for ensuring the implementation of relevant policies, targets, and action plans across the Group's operations.

4.1.3 Midsona strives to ensure that the BoD maintains relevant independence, has a diverse composition, and possesses the necessary ESG-related competence.

##### **4.2 Ensuring Resources and Competence**

Midsona is expected to ensure sustainability governance by:

- i. The BoD approves the double materiality assessment, related policies, targets, and reporting, and oversees material sustainability impacts, risks, and opportunities.
- ii. The CEO is accountable for managing material topics and ensuring the implementation of relevant policies, targets, and action plans.
- iii. Responsibility for sustainability management and reporting is assigned to the Chief Sustainability Officer (CSO).
- iv. Adequate resources, competence, and clearly defined responsibilities are



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ensured to manage sustainability matters effectively in the organisation.

#### 4.3 **Managing Impacts Risks and Opportunities**

Midsona is expected to ensure proper management of sustainability impacts, risks, and opportunities through the following actions:

- i. Conducting regular assessments of impacts, risks and opportunities, and integrating material topics into strategy, business model, and value chain management.
- ii. Implementing a Board-approved sustainability policy that covers material sustainability matters and translates Midsona’s commitments into practice.
- iii. Setting clear, time-bound targets for material impacts, risks, and opportunities, supported by actions and resources to secure progress.
- iv. Monitoring, evaluating, and reporting annually to the Board on compliance and progress in sustainability work.

#### 4.4 **Monitoring and Reporting Processes**

- i. Establishing reporting processes to track and disclose progress on material sustainability matters in line with legal requirements and Midsona’s reporting framework.
- ii. Implementing internal procedures and systems for collecting, reviewing, consolidating, and reporting sustainability data in compliance with applicable regulations.
- iii. Conducting risk assessments of sustainability reporting, maintaining appropriate internal controls, ensuring data quality, and keeping records of reported information

### 5 **GUIDING PRINCIPLES**

Our sustainability work is guided by the following sustainability framework which enables us to bring our mission to life - providing healthy food for people and planet, today and for many generations to come. It serves as our long-term guiding framework for embedding material environmental, social and



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governance (ESG) priorities into every aspect of our business strategy and sets the foundation for maintaining and leveraging our strong sustainability position. It is based on the following principles:

- **Environmental:** Acting to achieve a net-zero climate impact and minimize the environmental footprint – for us, our suppliers, and our customers
- **Social:** Promoting healthier choices, empowering people in our value chain and protecting workers’ rights, according to:
  - **Own workforce:** Ensure a safe, inclusive, and thriving workplace
  - **Workers in the supply chain:** Safeguarding the rights of workers
  - **Consumers:** Drive a shift towards a healthier & more environmentally friendly diet
- **Governance /Business conduct:** Delivering sound governance structures and reliable processes to secure we conduct business responsibly

while meeting regulatory requirements and act in line with global, recognized standards.

## **6 MATERIAL ENVIRONMENTAL TOPICS**

### **6.1 Climate Change**

6.1.1 Midsona is committed to mitigating and adapting to climate change and to managing climate-related impacts, risks, and opportunities. Our business activities shall be aligned with the Paris Agreement and the 1.5 °C pathway, driving progress toward science-based climate targets and supporting the EU Green Deal. We implement action plans and work towards achieving Midsona’s ambition to reach net zero by 2045.

6.1.2 We regularly assess climate-related risks and opportunities, including when significant changes occur in our operations or business scope. Midsona also strives for energy efficiency and increased use of renewable energy across our operations and value chain.



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## 6.2 **Pollution**

Midsona seeks to limit the use of harmful substances into soil in the products sold and, in their production, to manage related impacts and promotes sustainable farming practices.

## 6.3 **Water**

Midsona seeks to use water efficiently and promote sustainable water management in our value chain, to manage related impacts and risks.

## 6.4 **Biodiversity and Ecosystems**

Midsona is committed to reducing pressures on nature, biodiversity, and ecosystems. The company sets targets and implements action plans to prevent deforestation and the conversion of natural ecosystems linked to its operations, in line with its Zero Deforestation Policy.

## 6.5 **Resources and Circular economy**

Midsona is committed to managing its impacts, risks, and opportunities related to resource use and the circular economy across its operations and value chain. The company strives for all packaging to be recyclable, minimises the use of virgin materials, and increases the use of reused, recycled, or renewable resources in packaging. The company is dedicated to reduce the food waste in our own operations. Midsona also promotes sustainable sourcing of raw materials, prioritises renewable resources, and ensures that high-risk materials are covered by sustainability certifications or other mitigating measures. To further promote a circular economy in the value chain, Midsona encourage responsible waste handling in its upstream value chain.

## **7 MATERIAL SOCIAL TOPICS**

### 7.1 **Human rights**

Midsona is committed to respecting and protecting human rights and ensuring decent working conditions across its operations and value chain in accordance with international principals and standards mentioned in section 1. The company strives to prevent and address adverse human rights impacts, including child labour, forced labour, human trafficking, modern slavery, and the exploitation of vulnerable groups. Where Midsona causes, contributes to, or is linked to



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adverse human rights impacts, it takes appropriate steps to remedy, prevent, or mitigate such impacts.

## 7.2 **Own workforce**

7.2.1 Midsona is committed to managing its impacts, risks, and opportunities related to own workforce and upholds the rights to freedom of expression, association, collective bargaining, and privacy, and ensures that its operations, procurement, licensing, technology use, and product development do not contribute to human rights violations.

7.2.2 The company promotes fair working conditions, reasonable working hours, fair compensation, work-life balance, and family-related leave. Midsona works toward equal opportunities, equal pay, gender balance, and diversity and inclusion, while fostering an open, inclusive, and harassment-free workplace.

7.2.3 Health, safety, and psychological well-being are prioritised, aiming for zero harm through systematic management, workplace accident prevention, and continuous improvement. Midsona engages its workforce through regular dialogue, consultation channels, and engagement surveys, ensuring workers are involved and supported and that the Midsona Code of Conduct is followed.

## 7.3 **Workers in the Value Chain**

Midsona is committed to managing its impacts, risks, and opportunities related to workers in the value chain and engages with suppliers and business partners to promote human rights and decent working conditions throughout its upstream value chain, using its influence to drive positive change. The company implements and monitors a Supplier Code of Conduct, ensuring alignment with Midsona's standards. Midsona works with its partners to secure their commitment and compliance with these standards and incorporates respect for workers' rights into business partner selection, audits, and ongoing monitoring.

## 7.4 **Consumers and End-users**

7.4.1 Midsona is committed to managing the impacts and opportunities of its products and services on consumers and end-users, engaging with them to address concerns and needs in product development, innovation, design, marketing, labelling while driving a shift towards a healthier lifestyle by providing healthy food for people and planet.



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7.4.2 Product safety and quality are a top priority and Midsona works systematically to ensure all products are safe, meet legal requirements, and continuously improve safety and quality standards. Food and beverage products adhere to robust food safety and quality systems, and Midsona participates in required audits to ensure compliance.

7.4.3 The company strives to Lead the development of sustainable food and health products in Europe and promotes transparent, responsible marketing based on verifiable claims.

7.4.4 Midsona protects children and vulnerable groups from potentially harmful marketing practices and engages with peers to promote responsible marketing standards globally.

## **8 MATERIAL BUSINESS CONDUCT TOPICS**

### **8.1 Business Conduct**

Midsona is committed to conducting business responsibly, managing material impacts, risks, and opportunities related to business conduct, and fostering a corporate culture based on its values. The company ensures that all employees receive regular, risk-based training on key business conduct topics. Where Midsona causes, contributes to, or is linked to adverse business conduct impacts, it takes appropriate steps to remedy, prevent, or mitigate such impacts.

### **8.2 Code of Conduct**

Midsona implements a Code of Conduct aligned with its values, ensuring all employees are aware of and comply with its principles through training, including during onboarding.

### **8.3 Anti-Corruption**

Corruption and bribery are strictly prohibited, and the company maintains an anti-corruption program to prevent such risks.

### **8.4 Whistleblowing**

Midsona encourages employees and stakeholders to report breaches or potential breaches through established whistleblowing channels. The company has a



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whistleblowing policy and procedures in place to manage reports in accordance with legal and ethical requirements.

## **9 UPDATES AND REVIEW**

This policy shall be reviewed and updated annually or as needed based on the recommendations of General management and the outcome of the double materiality analysis.