Bonduelle France (BELL & Fresh), Spain, Portugal, Denmark, Belgium, Netherlands and Champiland

Lab Global

Disclosure Report Date Submitted: October 3rd, 2024

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## **Disclosure Materials**

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

#### **B Lab's Public Complaints Process**

Any party may submit a complaint about a current B Corp through B Lab's Public Complaint Process. Grounds for complaint include:

- Intentional misrepresentation of practices, policies, and/or claimed outcomes during the company's certification process
- 2) Breaches of the B Corp Community's core values as expressed in our Declaration of Interdependence

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company.



# **Disclosure Questionnaire**

#### **Industries and Products**

#### Yes No Please indicate if the company is involved in production of or trade in any of the following. Select Yes for all options that **Animal Products or Services** $\boxed{}$ **Biodiversity Impacts** $\square$ Chemicals $\square$ **Disclosure Alcohol** $\square$ **Disclosure Firearms Weapons** $\boxed{}$ **Disclosure Mining** $\boxed{}$ **Disclosure Pornography** $\boxed{}$ **Disclosure Tobacco** $\boxed{}$ **Energy and Emissions Intensive** $\overline{\mathbf{A}}$ <u>Industries</u> Fossil fuels $\square$ Gambling **Genetically Modified Organisms** $\overline{\mathbf{A}}$ Illegal Products or Subject to $\overline{\mathbf{A}}$ **Phase Out** Industries at Risk of Human $\square$ **Rights Violations Monoculture Agriculture** $\square$ **Nuclear Power or Hazardous** $\square$ **Materials** Payday, Short Term, or High **Interest Lending** Water Intensive Industries $\square$ **Tax Advisory Services**

#### **Outcomes & Penalties**

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior	$\checkmark$	
Breaches of Confidential Information		K
Bribery, Fraud, or Corruption		V
Company has filed for bankruptcy		N
Consumer Protection		V
Financial Reporting, Taxes, Investments, or Loans		$\searrow$
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		N
Labor Issues		N
Large Scale Land Conversion, Acquisition, or Relocation		K
Litigation or Arbitration		V
On-Site Fatality	V	
Penalties Assessed For Environmental Issues		Y
Political Contributions or International Affairs		K
Recalls	<b>✓</b>	
Significant Layoffs		Y
Violation of Indigenous Peoples Rights		N
Other	<b>V</b>	



#### **Practices**

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing		V
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		V
Company prohibits freedom of association/collective bargaining		V
Company workers are prisoners		$\searrow$
Conduct Business in Conflict Zones		
Confirmation of Right to Work		V
Does not transparently report corporate financials to government		N
Employs Individuals on Zero-Hour Contracts		K
Facilities located in sensitive ecosystems		N
ID Cards Withheld or Penalties for Resignation		K
No formal Registration Under Domestic Regulations		V
No signed employment contracts for all workers		V
Overtime For Hourly Workers Is Compulsory		V
Payslips not provided to show wage calculation and deductions		V

	Yes	No
Sale of Data		$\vee$
Tax Reduction Through Corporate Shells		V
Workers cannot leave site during non-working hours		V
Workers not Provided Clean Drinking Water or Toilets		N
Workers paid below minimum wage		N
Workers Under Bond		<b>V</b>
Other		$\checkmark$

## Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones	N	
Child or Forced Labor		$\checkmark$
Negative Environmental Impact		$\checkmark$
Negative Social Impact		$\checkmark$
Other		$\checkmark$



## **Disclosure Questionnaire Category: Recalls**

Issue Date	2021, 2022
Topic	Product recalls related to contamination
Summary of Issue	Over the last 5 years, Bonduelle France, Denmark, Belgium, Netherlands, Spain and Portugal have had a total of 5 material recalls of their products.
	CASE 1: Bonduelle Fresh France: 2 recalls related to listeria contamination Following an internal control plan conducted by the company, listeria monocytogenes was detected in the finished product at a level of > 100 cfu/g at the end of its shelf life. As a result, the company initiated a voluntary recall as the test results did not meet regulatory standards. The French Departmental Directorate for the Protection of the Public (PPDD) was notified, and the public was informed as requested by the PPDD.
	CASE 2: Bonduelle Group: 3 recalls of all ingredients containing EtO Bonduelle has undergone a recall in various European countries within the past five years at the request of the French authorities, who requested the systematic recall of all ingredients containing EtO. This resulted in three recalls due to findings from various preventive risk analyses conducted at different times in 2021 and 2022. The analyses involved upstream traceability to identify the affected products, downstream traceability to identify the quantities and customers affected, reception of analysis from the supplier, and toxicological analysis in collaboration with ADEPALE (the French interprofessional organization).
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	CASE 1 The contamination was detected in one of the company's factories, impacting products that were distributed and sold in France, Tahiti, Spain, and Portugal. All products had already been consumed when the recall was initiated. No cases of injuries or illness were reported. Affected products:  - July 2021: 107 boxes of spinach baby leaves (1 box contains 8 bags of 250g each) totalling 214 kg.  - September 2022: 197 boxes of rucola (1 box includes 8 bags of 175g each) were shipped for the concerned batch, along with 1 package that was scrapped, totalling 275.8 kg.
	In total 0.4 tons were withdrawn, representing less than 0.001% of the company's total sales volume (Bonduelle Europe Business Unit)  CASE 2
	All products containing EtO were recalled. No cases of injuries or illness were reported. Affected products:  - FR: 2686 packages = 10744 bags = 26860 kg  - Tahiti: 112 packages = 448 bags = 1120 kg  - ES: 1055 packages = 4220 bags = 10550 kg  - PT: 169 packages = 676 bags = 1690 kg  - DE: 110 packages = 440 bags = 1100 kg.



	In total, 41.32 tons were withdrawn, representing less than 0.015% of the company's total sales volume.
Impact on Stakeholders	CASE 1 There have been no affected consumers or returned products in either case. Listeria contamination is caused by a species of pathogenic (disease-causing) bacteria. The severity of listeriosis varies and can be fatal in some cases, especially among the elderly, immunocompromised individuals, and pregnant women.  CASE 2 There have been no reports of affected consumers or incidents. Ethylene oxide (EtO) is classified as carcinogenic, mutagenic, and toxic for reproduction under Regulation
	(EC) No 1272/2008 of the European Parliament and of the Council.
Management Practices	CASE 1 Since the summer of 2022, the company has implemented a Listeria-free control plan for agricultural raw materials upon receipt. The company has consistently maintained this control plan throughout the year. Additionally, the company's HACCP (Hazard Analysis & Critical Control Point) system is certified by IFS (International Featured Standard).  CASE 2 The company has implemented a purchase screening of ingredients to ensure that other products are not affected. A new internal requirement has been introduced to
	restrict sourcing from Turkey and India due to high contamination risks. Additionally, the company has included "Origin EtO risk" in all relevant products to address this concern.
Related Incidents?	No



## **Disclosure Questionnaire Category: Environmentally Intensive Industries**

Issue Date	Ongoing
Topic	Water Intensive Industries
Summary of Issue	As a company that manages agricultural and industrial processes, Bonduelle operates in an industry in which water use is a material environmental issue.
	At Bonduelle plants, water is used as an ingredient in the finished product (liquids and sauces) and in the manufacturing process as a way of transporting and transferring heat or cold. Water is also used to clean vegetables and production lines.
Size/Scope of Issue (e.g. \$ financial implication, # of	In the previous fiscal year, 100% of the company's revenue was earned from the sale of its food products.
individuals affected)	The company has determined its specific water intensity for various regions. The details are as follows (reporting year 22/23): - BELL: 16,18L/kg for France and 7,97L/kg for Santarem - FRESH: 9.2 L/kg for France, 30,5 L/kg for Italy
Impact on Stakeholders	Water intensive industries poses risks such as water stress or depletion of local water sources if water use is not appropriately managed.
	Bonduelle utilizes a combination of well water and drinking water:  - GROUP: well water 76%, drinking water 21%, and surface water (2%, exclusively in Brazil).  - BELL: well water 94%, 6% drinking water.  - FRESH FRANCE: 71% well water + 39% drinking water.  - FRESH ITALY: 99% well water + 1% drinking water.
	The company continuously monitors consumption and adheres to regulatory requirements, including during periods of drought and low groundwater levels. Operations are located in several water-stressed regions. A 2020 study identified sites in northern France, Santarém (Portugal), and Poland as being in areas projected to experience water stress by 2030. Furthermore, specific sites in Battipaglia (Italy), Straelen (Germany), and Murcia (Spain) have also been identified as being in water-stressed regions. Each site has an action plan to temporarily reduce water consumption during periods of high stress, in addition to long-term plans to reduce overall water usage. Over the past two years, all of France has faced water stress due to summer droughts and low groundwater levels. In response, regulatory requirements to reduce water consumption were implemented during these periods, with additional goals set for 2025. Notably, in 2024, groundwater levels have returned above average.
Management Practices	To manage their water intensity, the company has set ambitious reduction targets at both the group and entity levels (see CSR report link below for more details). Specifically, they aim for a 30% reduction in water usage at the group level and a 35% reduction in water intensity (m³/tfp) by 2035 compared to 2020 levels.



For FRESH, each site has its specific target, ranging from 20% to 40%, based on its current water intensity. These targets are driven by their commitment to sustainability and are tailored to each site's baseline water intensity. Bonduelle benchmarks their water use through professional organizations such as Adepale, the Association of Food Product Manufacturers or CTCPA (the agri-food technical center and equivalent European organizations; see link below). These benchmarks and water stress context and projections have led to the implementation of water grid best practices, focusing on daily management, and water efficiency through leak detection, standardizing consumption monitoring, setting standards, closely tracking consumption, and raising awareness among employees. Additionally, Bonduelle have established a network among their most water-intensive sites to share best practices and provide mutual support. They invest in technical improvements such as new, more water-efficient equipment. A new project focusing on water reuse, now permitted in the agro-industry in France from 2024, is currently under investigation (BELL) but does not yet have an implementation date. Within their supply chain, Bonduelle actively promotes responsible water management with their supplier farmers including the promotion of responsible use of water through moderate and reasoned use of water sources. Specifically in France, irrigation systems are implemented on 85% of their cultivated land to optimize water use. This commitment is reflected in the group's Agronomic Charter (see link below), outlining their expectations and practices to promote sustainable and regenerative agricultural practices across all of their operations. Compliance is regularly monitored by evaluating the proportion of growers that have signed their Agronomic Sourcing Charter (more details in CSR report). The company's relevant goals within their Agronomic charter include: - 80% of growers engaged in regenerative agriculture by 2030; - 100% of cultivated area using pollinator protection plan by 2030; - 90% of farmers renewing their contract with Bonduelle each year; - 100% of Agro employees trained in regenerative agriculture by 2030; - 80% of growers trained in regenerative agriculture by 2030. With regards to water quality, the company ensures compliance with local, European, and French regulations. Their internal water grids integrate wastewater management, with regulatory controls in place to ensure the quality of water at discharge. The company also operates a farm in Spain that uses recycled water and employs drip irrigation systems and sensors to precisely meet water needs. (FRESH). -Bonduelle CSR report Report -Adepale -CTCPA **Other Management** These comprehensive strategies and best practices enable us to manage water use effectively and responsibly, aligning with industry standards and **Comments** environmental sustainability goals.



## **Disclosure Questionnaire Category: Environmentally Intensive Industries**

Issue Date	Ongoing
Topic	Energy and Emissions Intensive Industries
Summary of Issue	As a company that manages agricultural and industrial processes, Bonduelle operates in an industry in which energy use is a material environmental issue.
	The company's primary contributors to their carbon footprint are identified within Scopes 1, 2, and 3: Scope 1 & 2: These include direct and indirect emissions from industrial operations and mushroom cultivation. Scope 3 encompasses emissions from product end-of-life, upstream agriculture, packaging, and industrial processes.
	Whether electric or thermal, energy is essential for the production process. Electricity feeds the deep-freezing process, the storage of frozen products and the air conditioning of refrigeration workshops. It is also used for the manufacture of compressed air, the production of chilled water, lighting and air conditioning of premises and for certain equipment: other engines, fans, conveyors, certain forklifts. Thermal energy is used to generate steam and hot water. It is also used in the production of preserves, heat recovery ventilation and power handling equipment.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In the previous fiscal year, 100% of the company's revenue was earned from the sale of its food products.  The company's energy intensity varies by region (reporting year 22/23):  - BELL France: 1098 kWh/TPF  - BELL Portugal: 115 kWh/TPF
	- FRESH France: 538 kWh/TPF - FRESH Italy: 532 kWh/TPF
Impact on Stakeholders	As an energy-intensive industry, manufacturing poses risks such as energy waste or overuse if resources are not appropriately managed.
	Bonduelle utilizes a diverse mix of energy sources including: - Electricity, solar electricity, natural gas, biogas, heat from biomass, propane, domestic fuel, LPG, and gasoil (BELL) - Electricity, natural gas, propane, LPG (FRESH)
Management Practices	Bonduelle is committed to near term science-based targets (SBTi) for carbon reduction and their detailed carbon intensity data is aligned with these targets, in order to meet their sustainability goals (more details in the company's Sustainability report linked below).
	To manage their energy use and carbon footprint effectively, 75% of their sites at BELL are certified under ISO 50001, 100% for FRESH. Each site has specific energy targets aligned with their overall carbon reduction trajectory. In addition the comapny has dedicated energy managers responsible for implementing action plans and investing in energy efficiency projects, often supported by public funding. Bonduelle has a reduction target of 38% Scopes 1 and 2 greenhouse gas (GHG) emissions by 2035



	(absolute), which is validated by SBTi. Bonduelle has set three priorities for its plants to help them achieve the group-wide climate target:  1. achieve energy savings;  2. substitute renewable energies for fossil fuels;  3. develop green electricity through direct long-term purchase contracts, as a priority in regions where grid electricity is carbon-intensive.  Bonduelle has set itself the target for 100% of its European sites to be ISO 50001 and/or ISO 14001 certified in the coming years. These international standards aim to continuously improve energy performance. 14 Bonduelle sites are ISO 50001 certified: in France, Germany and Italy.
Report	Bonduelle Sustainability Report 2022-2023 The Science Based Targets Initiative
Other Management Comments	Our commitment to continuous improvement in energy management and carbon reduction is demonstrated through these structured approaches and our adherence to international standards and best practices.



## **Disclosure Questionnaire Category: On-the-job Fatalities**

Issue Date	April 2021
Topic	Fatality involving employee while on the job
Summary of Issue	Bonduelle experienced one accident leading to fatality over the last 5 years. In April 2021, one employee died on the field after being hit by a lightning bolt.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	One employee was involved in the incident.
Impact on Stakeholders	The incident caused one fatality. In addition, fatalities have emotional, mental and financial implications to family members, friends and colleagues of the people involved in the occurrence.
Resolution	The Spanish Labour Inspectorate's report found no fault on the part of the employer given the incident was caused by unpredictable circumstances and the company had mechanisms and protocols in place to reduce risks involved.
Management Practices	Bonduelle has set up a lightning alert system (e-mail + telephone notification) to avoid any further risk and has also taken out death and disability insurance for all employees. The company also highlighted that workers are not required to work in stormy or potentially dangerous weather conditions.  Additionally, the company's whistleblowing system makes it possible to collect alerts
	from employees or other stakeholders.
Related Incidents?	No



## Disclosure Questionnaire Category: Operations located in Conflict Zones

Торіс	Company operates and has suppliers located in Conflict Zones
Summary of Issue	Champiland and Bonduelle Europe Long Life SAS, both French companies that are part of the Bonduelle group have had suppliers located in Conflict Zones over the last 5 years. Both companies specialize in the processing of canned, frozen and fresh vegetables.
	-Bonduelle Champiland has sourced Champiland mushrooms from agricultural suppliers in UkraineBonduelle Europe Long Life has sourced products from agricultural suppliers of green beans in Cameroon. The supplier from Cameroon was removed from the company's list of active suppliers at the end of 2023.
	Ukraine and Cameroon are currently considered conflict zones according to the list of fragile and conflict-affected situations (FCS) released annually by the World Bank Group (WBG) (see link below).
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	During the fiscal year 2023:  - Approximately 0.53% of Bonduelle Champiland's supplier purchases were from conflict zones.  - Approximately 0.3% of Bonduelle Europe Long Life's supplier purchases were from conflict zones.
Impact on Stakeholders	Business activities located in conflict zones are considered high-risk as they are more likely to cause or contribute to the conflict and/or sociopolitical instability.
	Countries classified as conflict zones are more likely to have a weak rule-of-law or a corrupt judicial system, which could undermine the effectiveness of operational grievance mechanisms for these businesses and their suppliers. In addition, the safety of the company's workers and other potential human rights violations are at risk.
Management Practices	Bonduelle Champiland has been providing support to its suppliers in Ukraine, helping them relocate from conflict zones if they choose to do so. They have introduced a third-party assessment process to evaluate suppliers and providers, scoring them based on various risk criteria and selecting them accordingly. Since the conflict began, the Ukraine management team has been reporting to the Western Europe business unit. The company is committed to complying with international sanctions and is supported by specialists in ensuring employee safety. To achieve this, the company is studying how to comply with international compliance programs imposed on groups, taking into account any conflicts with local constraints.
	Bonduelle Europe Long Life does not consider that the supplier is in the area affected by the conflict, however, the company has over time withdrawn business from the supplier, and in 2023 made final purchases from the supplier in Cameroon.
Report	Bonduelle's public statement on work in Ukraine and Russia
	World Bank list of fragile and conflict-affected situations (FCS)



## **Disclosure Questionnaire Category: Other disclosures**

Topic	Negative News (company is target of misinformation)
Summary of Issue	During 2022-2023, the Bonduelle Group was the target of a misinformation and destabilization campaign. The Group has formally denied this misleading information in 2 press releases
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The company is directly implicated in the false claims, and is the key affected stakeholder.
Impact on Stakeholders	The <u>spread of misinformation online</u> has become a severe threat to general mass public. Information which is fake or misleading and spreads unintentionally is known as misinformation. Prior research on misinformation in social media and online has highlighted various characteristics of misinformation and interventions thereof in different contexts. The issue of misinformation has become dominant with the rise of social media, attracting scholarly attention. The word 'misinformation' was listed as one of the global risks by the World Economic Forum.
Resolution	The company has released a <u>public statement</u> on the issue.
Management Practices	The company has refuted the claims. For further details please see the company's public statement on the matter linked below.
Report	Bonduelle's public statement
Related Incidents?	No



## **Disclosure Questionnaire Category: Outcomes & Penalties**

Topic	Anti Competitive Behavior
Summary of Issue	In January 2024, the Bonduelle Group was accused of engaging in anti-competitive practices in relation to the communication related to the absence or presence of BPA in their packaging. The company has contested the French Competition Authority's characterization of the technical and scientific cooperation in the sector as an anti-competitive practice, and appealed the decision April 18th, 2024. More details can be found in the Just Food article below.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The company was fined approximately €2.9 million, representing 0.12% of the company's revenue.
Impact on Stakeholders	The claims of this case make the company one of the affected stakeholders. The potential impact of the claims, of the continued use of BPA linings in products could cause health problems to humans exposed, and environmental damage.
Resolution	The company has filed for appeal in relation to this decision, the case is still ongoing.
Management Practices	The company has not implemented any practices in response to this case at this time as it is still pending an outcome.
Report	Bonduelle BPA Law Breach