

Ornua Co-operative Limited
**Modern Slavery &
Human Trafficking
Statement**

27 December 2025

About Ornua

Our Commitment

Ornua's co-operative ethos is at the heart of who we are and how we do business. Our co-operative structure requires that our business is founded on the principles of sustainable growth and shared equity for our members. Our governance model is built on values of co-operation and solidarity. The fundamentals of responsibility, sustainability, and equality define Ornua's co-operative structure and identity.

An integral part of our ethos is to protect human rights, including combatting modern slavery and human trafficking, in all aspects of our international business operations. Modern slavery refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, deception, coercion, or abuses of power. Human trafficking is the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit. Ornua recognises the need to implement effective practices and policies to mitigate against all modern slavery and human trafficking risks within our business and supply chain.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes the Modern Slavery and Human Trafficking Statement of Ornua Co-operative Limited and its subsidiaries ("Ornua") for the financial period ended 27 December 2025.

We welcome the transparency encouraged by the Act and the opportunity to share our actions to identify and prevent modern slavery risks affiliated with our business operations.

Our Business

Ornua is an Irish dairy co-operative that markets and sells dairy products on behalf of its Members, Ireland's dairy processors and, in turn, Irish dairy farmers. Ornua is Ireland's largest exporter of Irish dairy products and has annualised sales of €3.5 billion. Headquartered in Dublin, Ornua has a global team of 2,700 employees, operating from 10 business units worldwide, including 12 production facilities.

Ornua's purpose is to create value for Irish dairy farming families. It achieves this through: the marketing and sales of consumer brands, including Ireland's most successful food export Kerrygold, as well as Kerrygold Dubliner, Pilgrims Choice, Forto and BEO milk powders; and the procurement of dairy products and sale of dairy ingredients solutions to food manufacturing and food service customers across the world.



Our Values

Ornua's ambition is to be a truly diverse organisation where every individual feels empowered to bring their true selves to work every day; to be a leading, accredited employer of choice, allowing us to maximise our impact in the communities in which we operate.

Our values - Achieve great things together; Be our true selves; Make it happen; Seek and embrace new ideas; and Show you care - represent what we stand for and what is important to us and empower each employee to never look the other way when something isn't right and to make decisions based on what is the right thing to do.

Transforming for Growth

During the year, the business developed a new five-year strategy that will guide Ornua into its next phase of growth. *Transforming for Growth* strengthens Ornua's commitment to creating value for its Member Co-operatives while recognising where strengths and efficiencies can be leveraged.

A key enabler of the strategy is the implementation of a new global Operating Model - One Global Ornua - to simplify how we work, strengthen collaboration across markets and divisions, and harness the collective power of our global talent.

Environment, Social & Governance (ESG)

Ornua's Common Ground ESG strategy defines the business's approach to sustainability, focusing on three core pillars: Planet, People, and Products. It outlines Ornua's commitment to safeguarding the environment, creating better outcomes for people and bringing responsibly-produced, quality products to the world.

In 2025, we continued the work of reducing the impact we have on the environment and improving the sustainability of our supply chain in line with the company's commitments outlined in Common Ground. In 2025, we rolled out a new responsible sourcing program which will allow us to ensure that 85% of our dairy, packaging and ingredients are responsibly sourced.

In June 2025, Ornua created a Human Rights Program and appointed a Program Manager. In quarter three and four of 2025, Ornua completed a gap analysis and roadmap for human rights in Ornua and its supply chain. We identified a number of key initiatives that have been added to the project tracker and budget to be started in 2026.

Protecting People

Policies and Initiatives

As a co-operative, our partnerships and our people are key to us delivering our business strategy and creating value for our Member Co-operatives. Our business is powered by our team of over 2,700 people, representing 75 nationalities worldwide, working as one team to ensure the principles of our co-operative ethos are to the fore in all that we do. Ornua has a number of policies and initiatives to underpin our strategy and values, and provide clarity on how together we act ethically and with integrity to protect every one of our employees and prevent forced labour and human trafficking in our business, as follows:

Code of Business Conduct & Ethics setting out the key principles that constitute our way of doing business ethically. All employees are responsible for ensuring adherence to this Code.

Dignity at Work Policy ensuring fair employment practices and equality of opportunity for all current and potential employees, by promoting a work environment free from discrimination, intimidation, or harassment.

Ethical Trading Policy is based on the principles in the Ethical Trading Initiative and sets the ethical standards that Ornua's UK subsidiaries adhere to in tackling modern slavery.

Our Employee Assistance Programme is available to all our employees and their families to provide independent and informed support to safeguard their wellbeing and address work or personal concerns.

Our Health and Safety Management System commits to creating a culture with heightened focus on health and safety to provide a safe place to work on all our sites.

The Diversity, Equity & Inclusion strategy 'Belonging at Ornua' aims to foster a culture where everybody can bring their whole selves to work and maximises inclusion in our workplace. In line with this strategy a new Head of Opportunities & Belonging has been appointed for the first time to lead this agenda globally for Ornua.

Ornua's 'Spring Wellbeing' initiative ensures employees feel supported and can thrive in the workplace. A dedicated Spring Wellbeing team run employee-focussed wellbeing initiatives across all our key locations.

Recruitment Process

Our HR Teams across the globe conduct rigorous 'right to work' checks when hiring, to ensure only individuals entitled to take up employment are hired in a particular country. If we sponsor visas/work permits, we follow due immigration process in each jurisdiction and ensure salaries for such roles are at fair market rate.

Reward Process

We have rolled out career levels for employees across the organisation which allows us to benchmark roles and ensure a fair market rate is paid.

External Accreditations

Ornua received the following accreditations for our activities implemented in Ireland to protect our employees and pursue ethical business practices:

Business Working Responsibly Mark (Business in The Community Ireland)

Ornua has once again been awarded the Business Working Responsible Mark through Business in the Community Ireland. This award has been renewed for four years and is third party verified by the National Standards Authority of Ireland (NSAI). This award showcases Ornua's commitment to Corporate Social Responsibility, Workplace, Marketplace, Environment, and Community.

In 2025, Ornua took part in the Bord Bia and Business in the Community Ireland workshop on Human Rights Due Diligence, allowing us to better understand how we can ensure Human Rights across our business and supply base.

IBEC KeepWell Mark

Ornua has again been recognised as a leading employer in wellbeing through the IBEC KeepWell Mark, an Irish accreditation designed to acknowledge and celebrate companies at the forefront in promoting corporate wellness within company policies. Ornua was reaccredited in 2025 for two years.

Managing Our Supply Chain

Our Supply Chain

Our extensive supply chain encompasses more than 2,500 suppliers across various sectors, including dairy and non-dairy ingredients, as well as freight forwarders and facility management companies.

We acknowledge that the wide range of products, sourcing locations and markets associated with our purchases and distribution can pose potential risks.

Consequently, we are proactively enhancing our strategies and frameworks to assess risk within our supply chain. Ornua have established and improved several policies (as detailed below) in response to identified risks, and we remain committed to further refining and advancing our approach to ensure responsible and ethical conduct by our supply base.

Policies

Ornua's business philosophy, rooted in our co-operative ethos, requires that we aim to work only with business partners who can consistently meet with our standards and specifications and are committed to values of conduct that are compatible with our own.

We have implemented the following policies to ensure our suppliers meet these standards:

Our Business Partner Code of Conduct ("Code") reflects Ornua's commitment to operate responsibly and uphold human rights. The Code contains fundamental standards in relation to no child or forced labour, provision of safe places of work and decent working conditions, protection of the environment, and ethical business conduct (anti-bribery and corruption). The purpose of this code is to ensure these standards are upheld by suppliers of goods and services to Ornua. Since 2022, Ornua's standard contracting terms require all suppliers to adhere to this code.

Ornua's Counterparty Approval Process ensures all business partners (customers, consignees, and suppliers) are screened prior to doing business with Ornua to ensure they have a clean record and have not been convicted of any criminal activity, including modern slavery and human trafficking. The majority of Ornua's business partners/counterparties are also rescreened regularly.

Ornua's Global Corporate Procurement Policy ensures we source the right suppliers who accept and comply with Ornua's policies. We engaged the top 85% of suppliers by category spend across Ornua through a questionnaire which allowed us to create a baseline of ESG metrics for our suppliers. We also reinitiated member relations calls focusing on ESG. In 2025, we initiated a project focusing on embedding soy within our supply chain. This project is aimed at ensuring the soy embedded in our product is responsibly sourced.

Independent Platforms

To support our internal policies, Ornua is a member of organisations that provide independent support and verification of our suppliers and our suppliers' actions to mitigate the possibility of modern slavery risks in our suppliers' supply chains.

In 2025, as part of the new Human Rights Program, Ornua began a process of ensuring that all Ornua sites globally are members of SEDEX and have a completed Self-Assessment Questionnaire (SAQ). This work is expected to be completed in 2026 and will add to the manufacturing facilities we have across Ireland, the UK and US which are members of SEDEX.

Member sites are audited against ethical and human rights standards, usually in the form of SEDEX Member Ethical Trade Audit (SMETA). The SMETA audit is based on the Ethical Trading Initiative base code and UK laws. Ornua also uses the SEDEX platform to help access and verify the ethical standards of our suppliers, and to collaborate with both suppliers and customers on our ethical and responsible business practices. During 2025, Kerrygold Butter Packing Ireland Limited facility in Mitchelstown, Co. Cork was SMETA audited. We expect two further sites to be audited in 2026.

Ornua continues its process of integrating its shared group wide management system called 'Foods Connected'. This process is now live across Ornua sites in the UK, Ireland, Spain, and Germany. We expect to continue the integration of Foods Connected in 2026 and 2027. The system will complement the onboarding process for suppliers of raw materials to Ornua, which includes the requirements to share a supplier SEDEX membership

number or where a SEDEX supplier number is not available, a detailed assessment is completed by the supplier in relation to modern slavery risks.

Ornua's business in Germany is accredited by the ZNU-Standard for Sustainable Management. This standard supports companies in becoming more sustainable, demands continuous improvements and integrates all three dimensions of environmental, economic and social issues, with a strong focus on protecting human rights. Ornua is a Sustainable Agriculture Initiative (SAI) Partnership Member. This is one of the primary global food and drink value chain initiatives for sustainable agriculture. The SAI envisions a sustainable, thriving, and resilient agricultural sector that protects the earth's resources, human rights and animal welfare.



Reporting

Reporting Channels

Ornua has an open-door policy that gives employees the freedom to approach any member of management with ethical questions or concerns relating to our business. To support this approach, our Whistleblowing Policy provides a framework for our employees and suppliers to report concerns about illegal, dangerous or unethical conduct within our business, without fear of reprisal.

An independent global reporting service is available for employees or third parties to raise concerns, on an anonymous basis if necessary. All Whistleblowing incidents are reviewed by our Audit and Risk Committee, fully investigated, and appropriately actioned. In 2025, there were no reports received regarding modern slavery risks or human trafficking concerns.



Due Diligence and Risk Assessment

Organisational Risk Governance in Ornua

Ornua values lead our ethos around organisational risk management; building a positive risk culture supported by a formal Risk Management policy and processes. Ornua's Risk Management Framework has been designed using the Three Lines of Defence Model (Institute of Internal Auditors, 2020), which sets out how responsibilities are divided in relation to managing and monitoring risk across the Group.

Ornua's Risk Management Policy requires Ornua to implement a framework for identifying, assessing, and managing risk, at all levels of the business, to ensure it remains alert to the ever-changing environment in which it operates. This framework underpins a common language and approach to risk management and facilitates the early identification and assessment of risk, such as modern slavery and human rights risks.

By focusing on the proactive identification of our modern slavery and human rights risks, the framework enables Ornua to consider the appropriate mitigation steps or management actions.

We recognise our profile of modern slavery and human rights risks are not static and we endeavour to evolve in line with changes in operations, supply chain and the macro environment.

The Risk Management Framework both aligns and enhances the already established human resource policies and procedures, property management and health and safety programmes which ensure an appropriate working environment for direct/indirect employees and contractors.

Our Progress in 2025

Focus Areas	KPIs Achieved
Awareness - Raise awareness amongst employees on the topic of modern slavery and human trafficking.	Our Human Rights Program Manager attended numerous trainings regarding Human Rights, Modern Slavery and Due Diligence throughout the year.
Environmental Social and Governance Strategy (ESG strategy)	In 2025, Ornua appointed a Program Manager with responsibility for the roll out of the new Human Rights Program. The Program Manager has responsibility to notify the Director of Sustainability of any Human Rights risks identified across the Ornua Group.
Responsible Sourcing Framework	Commenced roll out of the Responsible Sourcing Framework with the aim of ensuring that 85% of our dairy, packaging, and ingredients are responsibly sourced.
Risk Management Framework	Ornua's Risk Management Framework further embedded in our activities, enabling the capture and reporting of modern slavery risks.

Approval

The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved on 21st May 2026 by the Board of Directors of Ornu Co-operative Limited. It constitutes the Modern Slavery and Human Trafficking Statement of Ornu's Irish and UK legal entities – Ornu Co-operative Limited, Ornu Foods, (UK) Limited, Ornu Ingredients Europe (UK) Limited, The Irish Dairy Board (UK) Limited, Kerrygold Butter Packing Ireland Limited, Ornu Dairy Supply UK Limited, Ornu Butter Trading UK Limited, Ornu Nantwich Limited and Ornu Nutrition Ingredients UK Limited in respect of the financial period ended 27 December 2025 and is signed by a Director of Ornu Co-operative Limited.



Kevin Toland
Chair
Ornu Co-operative Limited