



McCain Deforestation and Conversion Free (DCF) Policy

Introduction

At McCain Foods Limited (we, our or McCain), sustainability is at the heart of our purpose and runs through our values as a family business. We aim to make a difference now and for generations to come and this is demonstrated through our annual Sustainability Reports, our Global Environmental Policy and our McCain and Supplier Codes of Conduct.

As agriculture is the driving force of our business, deforestation and conversion is one of our key environmental concerns, both in relation to our impact and our dependence on the continuing health and resilience of ecosystems worldwide, as well as associated carbon emissions. McCain must tackle deforestation and conversion risks in our own supply chains and explore ways to work with others towards wider sector level change.

This Deforestation and Conversion Free (DCF) Policy (Policy) lays out our overarching approach to eliminating both deforestation and conversion in our supply chains, and sets out our [SBTi \(Science Based Targets initiative\)](#) commitment and targets relating to our highest forest-risk commodities. In line with definitions agreed within the [Accountability Framework initiative \(AFi\)](#), as well as guidance from the SBTi and the requirements of the EU Deforestation Regulation (EUDR), the following Policy covers all forms of deforestation and land conversion, regardless of whether the deforestation or land conversion is legally permitted in the relevant jurisdiction.

Alongside implementing this Policy, McCain will be working to comply with all relevant deforestation-related regulations including the EUDR. EUDR will require companies operating in the EU to prove that their supply of high-risk commodities was not sourced from lands deforested after 31st December 2020. Similar legislation may also be enacted in both the US (with the proposition of the FOREST Act) and the UK (with their Forest Risk Commodity legislation).

Definitions and Frameworks

Term	Definition
Deforestation	Loss of natural forest as a result of: (i) conversion to agriculture or other non-forest land use; (ii) conversion to a tree plantation; or (iii) severe and sustained degradation (AFi).

Conversion	<p>Loss of a natural ecosystem as a result of its replacement with agriculture or another land use, or due to a profound and sustained change in a natural ecosystem's species composition, structure, or function (AFI).</p> <p>Deforestation is one form of conversion, and this definition includes legal conversion.</p>
Verified Deforestation and Conversion Free (vDCF)	Commodities in our supply chains that are independently verified as Deforestation and Conversion Free (DCF) through a third-party certification scheme or a proven mechanism outlined in Section 7.
Science Based Targets initiative (SBTi)	<p>The SBTi is an initiative allowing companies to set externally verified targets relating to emissions. In 2025, they launched their Forest, Agriculture and Land Guidance (FLAG), providing a roadmap for companies to set near-term and net-zero targets for land use change and land management emissions, aligned with the latest climate science and industry context.</p> <p>Companies submitting FLAG targets are required to have a no deforestation commitment with a target date no later than 31st December 2025 and a cut-off date no later than 2020.</p>
Forest-risk commodities	Agricultural commodities that contribute most to deforestation worldwide, according to research done by the World Resource Institute (WRI) in their Global Forest Review. The seven agricultural commodities highlighted by WRI as the leading drivers of forest loss are the same as those covered in the upcoming EUDR: beef, cocoa, coffee, natural rubber, palm oil, soy, and wood products.

Scope

Business Scope

This Policy details the relevant commitments, targets and actions of McCain. Unless otherwise stated, reporting boundaries include subsidiaries owned or controlled by McCain, excluding our transportation subsidiary Day & Ross and acquisitions that we have completed within the last 24 months.

Commodity Scope

This Policy covers our sourcing of the forest-risk commodities palm oil, paper packaging and soy oil, which we have identified as our highest forest-risk commodities and applies to all suppliers and sourcing areas. Ongoing efforts relating to other forest-risk commodities such as beef and soy in feed are also included.

Our Commitment

At McCain, we aim to deliver verified deforestation and conversion free supply chains for our primary forest-risk commodities. In support of this, in line with SBTi FLAG, we have committed to no deforestation across our primary deforestation-linked commodities, with a target of December 31, 2025. This overarching commitment is supported by three targets to source vDCF palm oil, paper packaging and soy oil by the end of 2025. The SBTi FLAG Guidance follows the AFi guidance of recommending a cut-off date of no later than 2020, after which any deforestation occurring in sourcing locations would be considered non-compliant.

To achieve these targets, we intend to work with our suppliers and business partners to identify and mitigate the risks of deforestation and conversion in our palm oil, paper packaging and soy oil supply chains, and to communicate our progress clearly with our stakeholders. This will be accompanied by a deforestation and conversion grievance mechanism covering all our key forest-risk commodities,

Reporting

Progress against our stated DCF commitment will be reported in our annual Sustainability Report, which is available on our [corporate website](#).

For any concerns relating to this policy or associated actions, McCain has an established grievance procedure in place.

Any concerns may be reported through the following channels, with the option to remain anonymous:

- Email: codeconnection@mccain.com
- Online: at www.mccain.ethicspoint.com
- Ethics Helpline: a third-party call center (where available). The Ethics Reporting website and Ethics Helpline are available 24 hours a day in multiple languages. A complete list of telephone numbers can be found in the McCain Code of Conduct.

It takes courage to speak up when something's not right. We depend on all our stakeholders to express concerns and report possible violations. McCain will not retaliate against anyone who reports concerns in good faith.

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Date effective from: September 2025

Dates of progress update: Annually, in our Sustainability Reports

Links to complimentary policies: [Global Environmental Policy](#), [Supplier Code of Conduct](#), [McCain Code of Conduct](#).

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Approved By: VP External Affairs and Sustainability and Chief Procurement Officer

6.0 Our Approach

Work is already underway at McCain to identify and reduce the risk of deforestation and conversion within our supply chain. In 2024, McCain conducted an independent deforestation and conversion risk assessment on our business, the results of which have informed our approach. Through this process we identified commodities we source that carry a high risk of deforestation or land conversion and are in the process of developing roadmaps which feed into the commodity specific targets outlined later in this Policy. We aim to periodically repeat and re-evaluate these risks and roadmaps.

To ensure the implementation of this Policy, it is important to initiate a clear communication of responsibilities to suppliers, especially those deemed high risk due to the location or quantity of their supply. This supplier engagement will also allow us to collect relevant data and provide the full traceability to farm level necessary to verify DCF supply. In the future we will also seek to use satellite monitoring where possible. Going beyond supplier engagement, McCain will also explore other opportunities to affect supply chains, including participation in industry initiatives and coalitions to enact change at the sector level.

7.0 Commodity Specific Targets

Each commodity that we produce or source presents specific challenges and opportunities in relation to tackling the risk of deforestation and conversion, based on how and where they are produced, the complexity of the supply chain, and the existence of reliable third-party certification schemes.

To deliver our overarching commitment, we have specific targets and are developing roadmaps for each of the primary forest-risk commodities identified through our risk assessment as high risk for deforestation or conversion.

7.1 Palm Oil:

The clearing of land for palm oil cultivation has historically been a leading cause of tropical deforestation and conversion. However, it is between four and ten times more land-use efficient than any other oil crop and so sourcing an alternative oil may not necessarily offset the costs of using palm oil. As a result, McCain's approach to palm oil is to source only from certified DCF sources.

To verify palm oil as DCF, we primarily use the [Roundtable on Sustainable Palm Oil's \(RSPO\)](#) Segregated model as our minimum standard, but may also use their Identity Preserved model, which has even stricter requirements than the Segregated model. The RSPO is the largest certification scheme active in the palm oil sector globally and uses a deforestation and conversion cut-off date of November 2005 for primary forests and November 2018 for secondary forests.

Target

- McCain has set an SBTi FLAG target to achieve 100% vDCF palm oil by 31st December 2025, with a cut-off date of 2020 or earlier.
- This will be achieved through sourcing only from RSPO Segregated or Identity Preserved supply chains and continually increasing traceability of supply.

Scope

- All palm oil used as a frying oil in McCain branded and owned brand products. (We intend to work in a phased approach with ingredients and derivatives being assessed at a later stage).

7.2 Soy Oil:

Soy is one of the primary drivers of tropical deforestation and land conversion worldwide, predominantly in the Cerrado and Amazon biomes in South America.

Compared to other commodities like palm oil, there are lower quantities of certified soy on the market, which makes it challenging to source 100% certified DCF soy oil. Therefore, provision of country and sub-national evidence of origin of the soy can also support low deforestation and conversion risk sourcing strategies.

To achieve vDCF, McCain will therefore either source from a low-risk region or certified DCF soy oil. For certified soy, we will look to establish a physically segregated supply of DCF soy oil from certification schemes that achieve the [FEFAC \(European Feed Manufacturers' Federation\) Soy Sourcing Guidelines](#) such as [RTS](#) (Round Table on Responsible Soy) Segregated and [ProTerra](#) Identity Preserved or Segregated. RTS have a deforestation cut-off date of May 2009 and a conversion cut-off date of 3rd June 2016, whereas Proterra has a deforestation and conversion cut-off of 31st December 2008.

Target

- McCain has set an SBTi FLAG target to achieve 100% vDCF soy oil by 31st December 2025, with a cut-off date of 2020 or earlier.
- This will be achieved through low-risk origin sourcing, certification to a FEFAC-approved standard (such as RTRS Segregated or Proterra Segregated), proven deforestation-free supplier program or signed supplier declaration supported by relevant evidence confirming deforestation-free supply.

Scope

- All soy oil used as a frying oil in McCain branded and owned brand products manufactured by McCain.
(We intend to work in a phased approach with co-manufacturing assessed at a later stage).

7.3 Paper Packaging:

The clearance of natural forest for large-scale, monoculture tree farms to produce pulp for paper manufacturing is also a leading cause of deforestation and conversion both in tropical and temperate regions.

McCain's approach to reducing the environmental impact of our paper packaging involves looking for ways to reduce and optimize packaging as a whole, increasing the proportion of post-consumer recycled material fibers wherever feasible, and then sourcing certified DCF virgin packaging.

The Forest Stewardship Council (FSC) and Program for the Endorsement of Forest Certification (PEFC) are two leading certifications in the timber and paper industry. FSC certified materials are vDCF with a cut-off date of 31st December 2020. PEFC involves endorsement of national standards (including Sustainable Forestry Initiative (SFI) in North America) and does not always guarantee vDCF and requires additional checks.

To ensure the virgin paper packaging we use is produced without causing deforestation, we therefore seek primarily FSC certification but accept product certified under other standards such as PEFC where it provides equivalent DCF assurance and/or additional evidence of vDCF can be provided.

Target

- McCain has set an SBTi FLAG target for 100% vDCF virgin paper packaging by 31st December 2025, with a cut-off date of 2020 or earlier.
- This will be achieved through sourcing paper packaging certified by FSC or PEFC with additional vDCF evidence.

Scope

- All primary, secondary and tertiary virgin paper packaging used in McCain branded and owned brand finished products manufactured by McCain.
(We intend to work in a phased approach with co-manufacturing assessed at a later stage).

7.4 Other high-risk commodities

Beef

Cattle ranching is the [top driver](#) of tropical deforestation worldwide. Deforestation risk is primarily concentrated in [South America](#), where ranching is linked to the degradation of globally important biomes including the Amazon, Cerrado and Gran Chaco.

Beef makes up only a small proportion of our portfolio, but it is still important to tackle any potential deforestation and conversion risks associated with these products, especially in Europe where it is one of the in-scope commodities under EUDR.

As there is limited availability of beef certification schemes in high-risk regions, our focus is on increasing the traceability of our beef supply and prioritizing sourcing from low-risk regions.

Soy in Feed

Almost 80% of global soybean production is used as feed for livestock ([WWF](#)), which is potentially more difficult to trace back to source than direct soy due to greater supply chain length and complexity. McCain has some exposure to soybeans embedded within our meat, dairy and egg products. We recognize the challenges of achieving full traceability of this embedded soy, and will focus on increasing supplier engagement and traceability efforts as part of our approach to address risks of deforestation and conversion.

Mitigation activities to reduce deforestation and conversion risks relating to soy in feed may involve sourcing from low-risk origins, sourcing vDCF certified supply, reducing soy intake by animals, and increasing engagement in industry initiatives.

For any questions regarding the contents of this Policy, please contact:
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