

Sustainable Procurement Policy

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Public

1. Purpose

DFI Retail Group is committed to integrating environmental and social sustainability into our procurement decision-making, to build stakeholder trust, and to act responsibly for our customers, communities, supply chain partners, and the environment.

This Sustainable Procurement Policy (“Policy”) provides requirements and guidance for managing our environmental and social objectives and impacts in our trade procurement activities.

2. Definitions

In this Policy, the following definitions apply:

“Business Partners” has the meaning given to it in Section 3.2 below. Priority partners refer to those identified based on spend, strategic importance, risk exposure, or category relevance.

“DFI” means DFI Retail Group Holdings Limited.

“DFI Retail Group” means DFI and its majority owned or controlled subsidiaries, affiliates and businesses.

“Sustainability Committee” has the meaning given to it in Section 5.1 below.

“Senior Management” has the meaning given to it in Section 5.2 below.

“Team Members” has the meaning given to it in Section 3.1 below.

3. Who does this Policy apply to?

3.1 This Policy applies to all DFI Retail Group employees, including full-time, part-time, contract and temporary employees at all levels, and any person who acts on DFI Retail Group’s instructions (“Team Members”). Our markets may provide further addenda to refine the local application of this Policy and/or provide supplemental guidance applicable in the local legal framework.

3.2 In addition, we expect DFI Retail Group’s contractors, consultants, suppliers, and other business partners, including but not limited to franchisees (“Business Partners”), to follow the principles of this Policy in their dealings with us.

3.3 DFI Retail Group’s direct and indirect associated companies and joint venture partners are also encouraged to adopt the Policy or to incorporate its principles into their own policies.

4. Commitments

4.1 Sustainable procurement is a key mechanism which helps DFI Retail Group to manage our risks and opportunities, address adverse sustainability impacts through due diligence, set priorities, and exercise influence.

4.2 DFI Retail Group commits to:

- monitor and comply with all applicable public and local laws and regulations related to sustainable procurement and sourcing in the countries and regions where we operate. Where this Policy sets a more stringent requirement than the

applicable law, this Policy shall prevail. If local law prohibits full application of this Policy, DFI Retail Group will comply with the law while seeking to meet the intent of this Policy to the maximum extent possible;

- conduct business with Business Partners (i.e. suppliers) that comply with all applicable public and local laws and regulations in the countries and regions where they operate, including but not limited to the material issues covered by this Policy;
- establish and maintain an underlying framework for setting relevant priorities on sustainable procurement, and measure performance on an ongoing basis;
- assess and manage our priorities including practices that support the protection of climate, nature, biodiversity, circularity and sustainable packaging, human rights, and animal welfare on an ongoing and continuous improvement basis;
- seek opportunities to collaborate with relevant strategic Business Partners to improve sustainable practices; and
- take steps to execute this Policy in line with DFI Retail Group's Sustainability Framework and guiding principles; to help ensure it is relevant to DFI Retail Group's operating context.

5. Governance, Roles and Responsibilities

5.1 A sub-committee from the Management Committee shall be established (the "Sustainability Committee"), supported by the Group Sustainability team, and will provide overall direction and governance in relation to sustainable procurement-related matters. The Sustainability Committee is responsible for:

- leading the strategic direction on sustainability topics and establishing DFI's sustainability objectives and targets;
- providing governance and oversight to ensure alignment of relevant sustainability initiatives with business priorities; and
- monitoring and reviewing progress towards relevant Group sustainability targets, programmes, initiatives and risks.

5.2 Senior management ("Senior Management") of business units within DFI Retail Group shall be responsible for implementing this Policy within their respective scope of operations and areas of responsibility, helping to ensure alignment with DFI Retail Group's sustainable procurement-related objectives. In particular, Senior Management is responsible for:

- setting relevant sustainability targets for their business units and integrating them into procurement planning and performance metrics;
- identifying, assessing and managing relevant supply chain sustainability risks and opportunities for their business units;
- allocating adequate resources and budget to support initiatives;
- providing appropriate training for relevant Team Members and reviewing competency needs periodically;

- ensuring transparency and accurate representation when reporting sustainability performance and progress; and
- driving collaboration, innovation and continuous improvement.

5.3 In observing this Policy, the Commercial (NB) and Product Development (OB) Teams:

- shall comply with applicable public and local laws, this Policy, and internal procedures related to sustainable procurement and sourcing;
- shall conduct business with Business Partners that comply with all applicable public and local laws and regulations in the countries and regions where they operate, including but not limited to the material issues covered by this Policy;
- shall communicate the requirements of this Policy and the Supplier Code of Conduct to our relevant Business Partners and encourage them to cascade through their entire supply chain;
- should conduct proportionate and risk-based due diligence with enhanced focus on high-risk sectors, geographies and supplier tiers, and, where appropriate, require corrective action plans and follow-up verification;
- are encouraged to prioritise suppliers that formally acknowledge and/or accept our Supplier Code of Conduct and the requirements in this Policy;
- shall take steps to ensure that all product sustainability claims are substantiated, permitted under local regulations, and aligned with recognised international, industry, governmental or independent third-party standards, and applicable for use in the markets they are intended for.
- are encouraged to set relevant and measurable sustainability targets, aligned with DFI's overarching sustainability strategy, and integrate them into procurement planning and performance metrics;
- should participate in training on sustainable procurement and other relevant topics;
- should engage in collaboration, innovation and continuous improvement efforts; and
- should prefer Business Partners/suppliers that ensure animals in their supply chains are treated humanely and aligned with the globally recognised "Five Freedoms". This includes Business Partners /suppliers that implement:
 - Freedom from hunger and thirst: Ready access to water and appropriate nutrition to support animal health.
 - Freedom from discomfort and Freedom to express normal behaviour: Husbandry and housing conditions that support good welfare, including environmental comfort, animal health and opportunities for natural behaviours.
 - Freedom from pain, injury and disease and Freedom from fear and distress: Humane handling, transport and slaughter, seeking to ensure animals are managed in ways that minimise stress, pain and fear; animal health and welfare management practices based on recognised veterinary and industry standards, including good biosecurity practices, disease prevention and the responsible, medically justified use of antimicrobials.
- are encouraged to contribute to transparent reporting and data collection efforts.

6. Data Management and Reporting

DFI Retail Group shall establish and maintain appropriate processes and controls for the management, reporting, and disclosure of sustainable procurement-related information. In particular, DFI Retail Group shall:

- monitor supplier policy implementation, key risks, actions taken, and performance metrics, through a materiality and risk-based approach;
- apply recognised standards and methodologies and maintain controls for data quality (completeness, accuracy, timeliness, consistency); and
- disclose performance and progress in line with applicable regulatory requirements.

7. Reporting Violations

- 7.1 Team Members are encouraged to report any actual or suspected breach of this Policy through available channels, including their line managers or Sustainability team. Line managers are expected to direct and report any such incidents they become aware of to ensure timely review and investigation.

8. Policy Update and Interpretation

- 8.1 This Policy may be updated by the Policy Owner from time to time. Any questions related to this Policy shall be referred to the Policy Owner or the Legal Head of your business or function.
- 8.2 In case of any discrepancy, the English version shall prevail.
- 8.3 This Policy is guided by recognised external standards and references, including those listed below. Refer to the relevant guidance or local regulatory guidance for more detailed interpretation or implementation guidance:
- ISO 20400: Sustainable procurement guidance
 - GHG Protocol Corporate Accounting and Reporting Standard
 - GHG Protocol Scope 3 Standard
 - Kunming-Montreal Global Biodiversity Framework
 - Taskforce for Climate-related Financial Disclosures (TCFD)
 - Taskforce for Nature-related Financial Disclosures (TNFD)
 - Universal Declaration of Human Rights (UDHR)
 - International Labour Organisation (ILO) Core Conventions
 - UN Guiding Principles on Business and Human Rights (UNGPs)
 - OECD Guidelines for Multinational Enterprises
 - UN Global Compact Principles
 - ISO 18601–18606: Packaging and the environment standards series
 - Circular economy guidance, including principles from the Ellen MacArthur Foundation's New Plastics Economy
 - CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora)
 - World Organisation for Animal Health (WOAH, formerly OIE) animal welfare standards

- Five Domains Model of animal welfare
- Industry best practices, such as GS1 packaging sustainability guidance and the Consumer Goods Forum (CGF) Golden Design Rules (GDR).