Greencore

Better future *plan*

GRI INDEX 2021

GRI SUSTAINABILITY DISCLOSURE **DATABASE**

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Pillar	Report section	Material topic	GRI disclosure
N/A	Introduction		GRI 102: General Disclosures 2016
			GRI 205: Anti-Corruption 2016
			GRI 206: Anti-Competitive Behaviour 2016
			GRI 207: Tax 2019
People at the Core	Embedding a safety culture	Occupational health and safety	GRI 403: Occupational Health and Safety 2018
	Unlocking talent	Employee pay and benefits	GRI 202: Market Presence 2016
			GRI 401: Employment 2016
	Building engaging and effective teams	Diversity and inclusion	GRI 405: Diversity and Equal Opportunity 2016
			GRI 406: Non-Discrimination 2016
Sourcing with Integrity	Responsible sourcing	Responsible / sustainable sourcing, protecting biodiversity	GRI 304: Biodiversity 2016
			GRI 308: Supplier Environmental Assessment 2016
	Human rights	Responsible / sustainable sourcing, human rights and modern slavery	GRI 408: Child Labour 2016
			GRI 409: Forced or Compulsory Labour 2016
			GRI 412: Human Rights Assessment 2016
			GRI 414: Supplier Social Assessment 2016
	Low carbon supply chain	Climate change	GRI 305: Emissions 2016
Making with Care	Using less to make more	Climate change	GRI 302: Energy 2016
			GRI 305: Emissions 2016
		Water stewardship	GRI 303: Water and Effluents 2018
	Cutting out food waste	Food loss and waste	GRI 306: Waste 2020
	Packaging with the lowest possible planetary impact	Sustainable packaging	GRI 301: Materials 2016
Feeding with Pride	Our products	Food safety	GRI 416: Customer Health and Safety 2016
		Healthier and affordable food	GRI 417: Marketing and Labelling 2016
	Packaging	Sustainable packaging	GRI 301: Materials 2016
		Healthier and affordable food	GRI 417: Marketing and Labelling 2016

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General disclosures

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
	Organisational profile			
GRI 102: General Disclosures 2016	102-1 Name of the organisation	The reporting organisation shall report the following information: a. Name of the organisation.	Greencore Group plc.	
	102-2 Activities, brands, products, and services	a. A description of the organisation's activities. b. Primary brands, products, and services, including an explanation of any products or services that are banned in certain markets.	a. We are a leading manufacturer of convenience food in the UK and our purpose is to make every day taste better. To help us achieve this we have a model called The Greencore Way, which is built on the differentiators of People at the Core, Great Food, Excellence and Sustainability - The Greencore Way describes both who we are and how we will succeed. b. We supply food service, grocery and other retailers, including all of the major UK supermarkets. We have strong market positions in a range of categories including sandwiches, salads, sushi, chilled ready meals, chilled soups and sauces, chilled quiche, ambient sauces and pickles, and frozen Yorkshire puddings.	
	102-3 Location of headquarters	a. Location of the organisation's headquarters.	Dublin.	
	102-4 Location of operations	a. Number of countries where the organisation operates, and the names of countries where it has significant operations and/or that are relevant to the topics covered in the report.	Two - United Kingdom and Ireland.	
	102-5 Ownership and legal form	a. Nature of ownership and legal form.	plc.	
	102-6 Markets served	a. Markets served, including: i. Geographic locations where products and services are offered; ii. Sectors served; iii. Types of customers and beneficiaries.	i. United Kingdom; ii. Convenience food; iii. Supermarkets, convenience stores, discounters, food service, travel stores.	
	102-7 Scale of the organisation	a. Scale of the organisation, including: i. Total number of employees; ii. Total number of operations; iii. Net sales (for private sector organisations) or net revenues (for public sector organisations); iv. Total capitalisation (for private sector organisations) broken down in terms of debt and equity; v. Quantity of products or services provided.	i. 12,955; ii. 21 production units at 16 locations, five regional distribution centres and 13 transport hubs; iii. £1,324.8m; iv. At 24 September 2021: Market cap of £0.7bn, Net Debt £0.2bn; v. 2,164 live products.	
	102-8 Information on employees and other workers	a. Total number of employees by employment contract (permanent and temporary), by gender. b. Total number of employees by employment contract (permanent and temporary), by region. c. Total number of employees by employment type (full-time and part-time), by gender. d. Whether a significant portion of the organisation's activities are performed by workers who are not employees. If applicable, a description of the nature and scale of work performed by workers who are not employees. e. Any significant variations in the numbers reported in Disclosures 102-8-a, 102-8-b, and 102-8-c (such as seasonal variations in the tourism or GRI cultural industries). f. An explanation of how the data has been compiled, including any assumptions made.	a. Permanent Female 5,204 / Male 7,725 / Other 3 / Temporary Female 1 / Male 3. b. UK Permanent 12,913 / Ireland Permanent 22 / UK Temporary 3 / Ireland Temporary 1. c. Full-time Female 4,248 / Full-time Male 7,601 / Full-time Other 3. Part-time Female 357 / Part-time Male 127. d. We use agency labour to manage fluctuations in demand (typically for hourly paid operative roles), however the majority of our workforce are employed on a Greencore contract. e. No significant overall changes - site fluctuations on seasonal demand. f. The data has been compiled from reports run for the 25th September from our HR system - Open HR and from single resource (agency) reports.	

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General disclosures *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 102: General Disclosures 2016	102-9 Supply chain	a. A description of the organisation's supply chain, including its main elements as they relate to the organisation's activities, primary brands, products, and services.	Greencore has contracts for supply of ingredients and packaging with a wide range of companies from small local specialists to global, large organisations. The majority of contract expenditure is with UK and Irish companies. Circa 3,000 suppliers transacted with us in a 12 month period. There is a high concentration across ingredients and packaging. Our top 10 suppliers account for around 30% of spend, with the top 40 at 60% of spend. Over 11,000 individual items will be purchased in a 12 month period, reflecting a high level of product development. Due to the nature of the markets we operate in, we procure a high proportion of our direct supplies from UK / Irish based manufacturers. However, we do purchase materials from across the world out of necessity, where local supply is not viable.	

	102-10 Significant changes to the organisation and its supply chain	a. Significant changes to the organisation's size, structure, ownership, or supply chain, including:
		  i. Changes in the location of, or changes in, operations, including facility openings, closings, and expansions;
		  ii. Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organisations);
		  iii. Changes in the location of suppliers, the structure of the supply chain, or relationships with suppliers, including selection and termination.
			i. Disposal of our US business in November 2018;
			
			ii. Return of value to shareholders, in the form of a tender offer of £509m, at the end of January 2019;
			
			iii. Acquisition of Freshtime September 2019.	

	102-11 Precautionary Principle or approach	a. Whether and how the organisation applies the Precautionary Principle or approach.	We do not explicitly refer to the Precautionary Principle or approach in our risk management framework. We seek to contribute to society by generating profits responsibly, which ties in with our corporate value of being purpose-driven.	
	102-12 External initiatives	a. A list of externally-developed economic, environmental and social charters, principles, or other initiatives to which the organisation subscribes, or which it endorses.	National Food Strategy — Greencore has publicly backed calls for "mandatory reporting" of the types of food being sold to customers, as part of an unprecedented joint-bid to improve the nation's health. We've signed up to a plan which would see us set out annually how we're boosting the amounts of fruit and vegetables and products containing fibre sold to customers — as well as how we're reducing sales of food high in saturated fat, salt and/or sugar. The historic transparency drive would also see Britain's food giants for the first time set out the amount of meat, fish and plant-based protein being sold, as well as setting out how we're reducing food waste. Quote: "Providing our customers with healthy, sustainable food whilst reducing waste and minimising our impact on the environment is at the core of Greencore's purpose and sustainability strategy. We welcome these proposals which will provide consumers with a clear view of the progress that is being made by the UK food industry." The Climate Pledge — This year we took further action on climate change by joining The Climate Pledge, a commitment co-founded by Amazon and Global Optimism to meet the goals of the Paris Agreement 10 years early. Science-Based Target initiative ("SBTi") We have applied to the SBTi to get our own SBT formally approved this year. Friends of Champions 12.3 — Halve food waste by 2030 in line with UN Sustainable Development Goal 12.3. DEFRA "Step up to the plate" — Pledge to commitments on measuring and reducing food waste adopting the WRAP and IGD Food Waste Reduction Roadmap to measure, report and act on food waste. Courtauld Commitment — We endorse the Courtauld Commitment through our membership of the Chilled Food Association (who are signatories of CC2025). UK Plastics Pact — We support the UK Plastics Pact and are committed to meeting its targets through our membership of the Chilled Food Association (who are signatories of UKPP). Roundtable on Sustainable Palm Oil — We have been members of the RSPO since 2011 and report annually on our progress through the Annual Communication of Progress ("ACOP").	

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General disclosures *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 102: General Disclosures 2016	102-13 Membership of associations	a. A list of the main memberships of industry or other associations, and national or international advocacy organisations.	Sedex - An online platform for sharing ethical trade information through supply chains. We are members of the Sedex Stakeholder Forum and use Sedex tools to drive our systems. FNET - Food Network for Ethical Trade - We are Board members and current Chair. This is an organisation to improve human rights in supply chains through a common approach. ALP - Association of Labour Providers - We are associate members of the specialist trade association promoting good practice among labour agencies. Established at the instigation of the UK Government. Stronger Together - A multi-stakeholder business initiative to address Modern Slavery, working together to reduce exploitation. GLAA - Gangmasters and Labour Abuse Authority - A non-departmental public body: "Working in partnership to protect vulnerable and exploited workers". Food Ethics Council - We are Business members of the Food Ethics Council; a charity providing information on food and farming ethics. Aim is to create a food system that is fair and healthy for people, animals and the environment. MSC - We hold Group Marine Stewardship Council certification for the nine of our manufacturing facilities that use fish. All sites also receive annual compliance audits as part of our internal governance process with a sample selected for surveillance by the certification body. Modern Slavery Intelligence Network - Launched in 2020, Greencore is an active member of the Modern Slavery Intelligence Network ("MSIN"), a collaboration between a group of leading companies in the UK food sector. The purpose of the MSIN is to develop and trial a structured intelligence sharing mechanism to enhance members ability to: • Protect workers from exploitation • Prevent and disrupt worker exploitation in their supply chains • Prepare systems against identified trends.	
	Strategy			
	102-14 Statement from senior decision-maker	a. A statement from the most senior decision-maker of the organisation (such as CEO, chair, or equivalent senior position) about the relevance of sustainability to the organisation and its strategy for addressing sustainability.		See page 4 of our sustainability report 2021 found here.
	Ethics and integrity			
	102-16 Values, principles, standards, and norms of behaviour	a. A description of the organisation's values, principles, standards, and norms of behaviour.	See our Code of Ethics and Business Conduct.	
	Governance			
	102-18 Governance structure	a. Governance structure of the organisation, including committees of the highest governance body. b. Committees responsible for decision-making on economic, environmental, and social topics.	a. In order to ensure that it discharges its role appropriately, the Board has established an effective Committee structure in order to assist the Board in the fulfilment of its responsibilities. Further details on the role of the Committees and the work undertaken by each Committee in the year under review can be found in our annual report. b. We have a defined sustainability governance structure. Our Sustainability Steering Committee takes overall responsibility for our sustainability programme. Below the Steering Committee, we have subject matter expert committees for key areas of our strategy, including; responsible sourcing, ethics and human rights, environment and food waste, packaging, health and nutrition, and community.	
	Stakeholder engagement			
	102-40 List of stakeholder groups	a. A list of stakeholder groups engaged by the organisation.		See page 6 in the Managing our Impact section of our sustainability report 2021 found here.
	102-41 Collective bargaining agreements	a. Percentage of total employees covered by collective bargaining agreements.	46%.	
	102-42 Identifying and selecting stakeholders	a. The basis for identifying and selecting stakeholders with whom to engage.		See page 6 in the Managing our Impact section of our sustainability report 2021 found here.

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General disclosures *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 102: General Disclosures 2016	102-43 Approach to stakeholder engagement	a. The organisation's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.		See page 6 in the Managing our Impact section of our sustainability report 2021 found here.
	102-44 Key topics and concerns raised	a. Key topics and concerns that have been raised through stakeholder engagement, including: i. How the organisation has responded to those key topics and concerns, including through its reporting; ii. The stakeholder groups that raised each of the key topics and concerns.		See page 6 in the Managing our Impact section of our sustainability report 2021 found here.
	Reporting practice			
	102-45 Entities included in the consolidated financial statements	a. A list of all entities included in the organisation's consolidated financial statements or equivalent documents. b. Whether any entity included in the organisation's consolidated financial statements or equivalent documents is not covered by the report.	All entities covered. 100% ownership unless otherwise stated. Freshtime UK Limited Greencore Advances Designated Activity Company Greencore Beechwood Limited Greencore Convenience Foods Limited Partnership Greencore Convenience Foods Limited Liability Partnership Greencore Developments Designated Activity Company Greencore Finance Designated Activity Company Greencore Foods Limited Greencore Food to Go Limited Greencore Funding Limited Greencore Grocery Limited Greencore Prepared Meals Limited Greencore UK Holdings Limited Hazlewood (Blackditch) Limited Hazlewood Foods Limited Irish Sugar Designated Activity Company Trilby Trading Limited.	
	102-46 Defining report content and topic Boundaries	a. An explanation of the process for defining the report content and the topic boundaries. b. An explanation of how the organisation has implemented the Reporting Principles for defining report content.		See page 6 in the Managing our Impact section of our sustainability report 2021 found here.
	102-47 List of material topics	a. A list of the material topics identified in the process for defining report content.		See page 6 in the Managing our Impact section of our sustainability report 2021 found here.
	102-48 Restatements of information	See the Managing our Impact section of our Sustainability Report 2020 found **here**.	There are no restatements of information.	
	102-49 Changes in reporting	a. Significant changes from previous reporting periods in the list of material topics and topic Boundaries.	There have been no changes in reporting.	
	102-50 Reporting period	The reporting organisation shall report the following information: a. Reporting period for the information provided.	October 2020 - September 2021.	
	102-51 Date of most recent report	a. If applicable, the date of the most recent previous report.	November 2020.	
	102-52 Reporting cycle	a. Reporting cycle.	Annual.	

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General disclosures *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 102: General Disclosures 2016	102-53 Contact point for questions regarding the report	a. The contact point for questions regarding the report or its contents.	Head of Sustainability, Andy Wright.	
	102-54 Claims of reporting in accordance with the GRI Standards	a. The claim made by the organisation, if it has prepared a report in accordance with the GRI Standards, either: i. 'This report has been prepared in accordance with the GRI Standards: Core option'; ii. 'This report has been prepared in accordance with the GRI Standards: Comprehensive option'.	This report has been prepared in accordance with the GRI Standards: Core option.	
	102-55 GRI content index	a. The GRI content index, which specifies each of the GRI Standards used and lists all disclosures included in the report. b. For each disclosure, the content index shall include: i. The number of the disclosure (for disclosures covered by the GRI Standards); ii. The page number(s) or URL(s) where the information can be found, either within the report or in other published materials; iii. If applicable, and where permitted, the reason(s) for omission when a required disclosure cannot be made.		See page 2 of this document here.
	102-56 External assurance	a. A description of the organisation's policy and current practice with regard to seeking external assurance for the report. b. If the report has been externally assured: i. A reference to the external assurance report, statements, or opinions. If not included in the assurance report accompanying the sustainability report, a description of what has and what has not been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process; ii. The relationship between the organisation and the assurance provider; iii. Whether and how the highest governance body or senior executives are involved in seeking external assurance for the organisation's sustainability report.	We have not undertaken external assurance of the statements and data within this report.	

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Material topics | 200 series (Economic topics)

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
Indirect economic impacts				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 202: Market Presence 2016, the reporting organisation shall report the following information:
		a. An explanation of why the topic is material.
		b. The Boundary for the material topic, which includes a description of:
		  i. Where the impacts occur;
		  ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		c. Any specific limitation regarding the topic Boundary.
			a. Greencore is committed to be an employer of choice, and to build organisational capability where inspirational leaders support highly engaged people to deliver superior performance in a fair and rewarding environment.
			
			b. Greencore's key impact in relation to the labour market is through the engagement of agency workers.
			  i. The use of temporary labour agencies whose staff are compensated at National Living Wage level causes potential negative impacts, particularly for workers who are employed on zero hours contracts. This may directly affect their earning capacity unless managed closely and has a potential knock-on effect on the vitality of the communities they live in.
			  ii. While Greencore sets the rate of pay for temporary colleagues and is therefore directly responsible for the rate, the agency management team manage the working hours of their staff. Greencore is indirectly responsible for this as the requirement for flexible working means a minimum working week is not guaranteed. Greencore can influence this to a certain extent; however third party suppliers are responsible for the management of their own staff and the hours available for them to work.
			A high rate of employee turnover can indicate dissatisfaction amongst employees. High turnover rates also affect human capital value, stability, business performance and the loss of knowledge and discretionary effort. All stakeholder relationships can be adversely affected by high turnover. Greencore is a business which prides itself on key stakeholder partnerships and relationships which have been formed and progressed over a significant period. Stability is key to these relationships moving forward in a positive way. Greencore is directly responsible for delivering a positive employer brand and employee experience. Colleagues are encouraged to consider their career aspirations and Greencore is committed to facilitating the achievement of these and thereby offering a long and sustainable career choice for employees which should, in return reduce or lower employee turnover.
			
			Moving forward into 2022 one of our main strategic pillars will be centred around labour sustainability. It is imperative that Greencore has an employee value proposition that attracts, develops and retains colleagues. Greencore will endeavour to do this through offering career opportunities at all levels within the organisation.
			c. None.	

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Material topics | 200 series (Economic topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-2 The management approach and its components	For GRI 202: Market Presence 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: 　i. Policies; 　ii. Commitments; 　iii. Goals and targets; 　iv. Responsibilities; 　v. Resources; 　vi. Grievance mechanisms; 　vii. Specific actions, such as processes, projects, programmes and initiatives.	a. From an external and organisational perspective, we have been identifying opportunities to improve our engagement with our permanent and agency-based workforce. Stakeholders and business customers increasingly expect suppliers to take a more integrated, partnership approach as standard. Global mobility is being impacted by Brexit and a rise in agile working is impacting local mobility. We developed a Group People Plan to support our business strategy of growth, relevance and differentiation. Responsibility for the deployment of this plan sits with our Chief People Officer. Heads of HR for each Business Unit work in conjunction with the site team and the site HRBP's to ensure this is managed. More specifically, due to labour turnover figures and availability of external labour, together with Brexit considerations, manufacturing flexibility demands and skills gap analysis we identified labour sustainability as a key pillar within the HR People Plan, launching our Labour Sustainability Project. b. Both the Group People Plan and Labour Sustainability Plan are deeply integrated into our day-to-day operations across all business units, with a long-term view for change and continuous improvement at the core. c. i. These are supported by a policy structure focused on the development of Greencore colleagues. 　ii. iii. While we do not have a policy in place specifically relating to remuneration, we plan to produce one within 12 months to support our ongoing work. 　iv. The Greencore HR Director - Reward and Shared Services is responsible for this policy. 　vii. After identifying the number of colleagues / temporary staff who are compensated In line with the National Living Wage, Greencore implemented a workstream to address this issue and move towards being an employer paying staff at real living wage levels. This has led to the introduction of a pay pyramid and new contract, onto which we have transferred over 1,300 agency colleagues, guaranteeing them a minimum working week and opportunity to progress their career. The Labour Sustainability Project will continue to review and address how we manage employment within Greencore. The project spans recruitment to retirement with the fundamental objective of delivering a sustainable labour force to support business growth. A reward and remuneration strategy is in place for all salaried positions and a generic contract of employment for all weekly paid colleagues across the group is in place. Pay scales for weekly colleagues are determined by local negotiations and sit in line with market rates. Agency colleagues are entitled to, and receive, the same pay and benefits as those of permanent Greencore colleagues. Going forward the business is assessing the possibility of including agency colleagues in future engagement surveys. Flexibility is managed proactively, and with a view to delivering sufficient working hours to agency colleagues. A robust recruitment process is in place and potential new hires are benchmarked against a behavioural set which underpins the culture within Greencore. We are building on this by undergoing a transformation of recruitment methods to build a framework for selection with an objective of reducing the turnover within salaried and weekly paid populations. Performance management and talent development is managed proactively and career planning and development is a key part of the Greencore experience. There is a target to reduce the number of external hires and promote internally where possible — internal hires are increasing year on year. To develop our employees and manage our turnover, we undertake regular reviews, probationary periods and regular check-ins through our Grow with Greencore programme. We use competency frameworks to manage our direct employees, which includes role requirements and expected levels of behaviour. Turnover is also a site KPI and reviewed on a weekly and monthly basis. To effectively manage our agency workers, labour planning meetings and forecasting are used to determine staff numbers and manage agency workers. 　vi. We use an anonymous external helpline as well as internal grievance procedures to remedy negative impacts when they occur. These apply to both staff and the communities we operate in. In order to monitor the effectiveness of these grievance mechanisms we gather employee feedback, predominantly in forums, surveys and through Union stewards. When a grievance is raised, we open a case which is managed by a Greencore team member who is not directly associated with the issue. Along with an independent third party, we individually assess each grievance. *The effect of the COVID pandemic during 2021 has seen a national shortage within the labour market across the UK, with increased competition to attract and secure employees. Greencore has responded to the shortage in labour supply through offering productivity incentives and through the introduction of a flexible working approach across the entire colleague population.* *Moving into 2022, the Group People Plan and in particular, the Labour Sustainability pillar will continue to focus on initiatives that will deliver continuous improvement in managing labour requirements in our manufacturing operation, across our reward structure and through offering an enhanced employee value proposition.*	
	103-3 Evaluation of the management approach	For GRI 202: Market Presence 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: 　i. The mechanisms for evaluating the effectiveness of the management approach; 　ii. The results of the evaluation of the management approach; 　iii. Any related adjustments to the management approach.	a. i. We use an employee engagement process to provide a two-way feedback mechanism. 　ii. Our last evaluation showed positive engagement scores within the survey, with a focus area of career development and career opportunities. 　iii. This led to the development of our management system and talent calibration, as well as twice yearly succession planning. 8,203 colleagues took part in our People at the Core survey. The results from our 2021 survey were extremely encouraging with an overall engagement score of 74% (an increase of 5% on the previous year). 81% of colleagues reported that they had confidence in the decisions made by Greencore's senior leadership and 93% of colleagues understand what standards of work and behaviours are expected of them. Action plans are in place across each site and function to address and improve the key areas highlighted within the survey.	

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Material topics | 200 series (Economic topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	The reporting organisation shall report the following information: a. When a significant proportion of employees are compensated based on wages subject to minimum wage rules, report the relevant ratio of the entry level wage by gender at significant locations of operation to the minimum wage. b. When a significant proportion of other workers (excluding employees) performing the organisation's activities are compensated based on wages subject to minimum wage rules, describe the actions taken to determine whether these workers are paid above the minimum wage. c. Whether a local minimum wage is absent or variable at significant locations of operation, by gender. In circumstances in which different minimums can be used as a reference, report which minimum wage is being used. d. The definition used for 'significant locations of operation'.	a. Our ratio of entry level wage of National minimum wage / National living wage for Male and Female is 1:1. b. Our temporary work provider pays the National Living Wage to it's employees. We monitor these payments through conducting regular agency audits every six months. The audit scrutinises and validates the payroll payments made to colleagues. c. Using National Minimum wage at all significant locations of operation (i.e it is not absent or variable between sites). All colleagues are on or above National or Living wage. Minimum wage does not differ by gender by site. d. By significant location we refer to all manufacturing sites distribution depots and office locations.	
Anti-corruption				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 205: Anti-Corruption 2016, the reporting organisation shall report the following information:
		
		a. An explanation of why the topic is material.
		
		b. The Boundary for the material topic, which includes a description of:
		   i. Where the impacts occur;
		   ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		
		c. Any specific limitation regarding the topic Boundary.
			a. To be a trusted business, we must work to a consistent and high set of standards.
			
			b. i. ii. Upholding a high standard of business ethics is vital not just because it is the right thing to do but also for the purposes of ensuring compliance with all relevant laws and maintaining trust with our stakeholders (customers, suppliers and employees alike).
			
			Greencore Group plc ("Greencore") is committed to conducting its business with the highest level of honesty and integrity.
			
			c. None.	

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Material topics | 200 series (Economic topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-2 The management approach and its components	For GRI 205: Anti-Corruption 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: 　i. Policies; 　ii. Commitments; 　iii. Goals and targets; 　iv. Responsibilities; 　v. Resources; 　vi. Grievance mechanisms; 　vii. Specific actions, such as processes, projects, programmes and initiatives.	a. and c. i. ii Our Code of Ethics and Business Conduct (the "Code") sets out the fundamental principles we rely on at Greencore to carry out our day-to-day work. We do business in line with our Code, values and behaviours, policies and procedures relating to all aspects of ethical business, including bribery and corruption, supply chain standards, anti-competitive behaviour and revenue transparency. ii. Greencore is committed to zero incidents of corruption or anti-competitive behaviour, driven by robust policies and processes and embedding a culture of high standards of ethics. We expect to work only with business partners that share our commitment to work to these high standards and with the utmost integrity. We also expect our suppliers, customers, contractors and their employees to act in a way that is consistent with our ethical standards. As a large-scale business with wide-ranging international supply chains and customer bases, we are aware of the risks of corruption. This includes practices such as bribery, facilitation payments, fraud, extortion, collusion, and money laundering; the offer or receipt of gifts, loans, fees, rewards, or other advantages as an inducement to do something that is dishonest, illegal, or represents a breach of trust. We are aware that corruption is broadly linked to negative impacts, such as poverty in transition economies, damage to the environment, abuse of human rights, abuse of democracy, misallocation of investments, and undermining the rule of law. While avoiding corruption in our internal operations is paramount, avoiding corruption within our supply chains is also vital: our responsibility does not end at the Greencore gates. We have controls in place with the aim of avoiding corruption throughout our business including, but not limited to, within our supply chain. "We understand that our success is dependent on our compliance with the laws and regulations that apply to our business activities. We therefore do not tolerate any form of bribery or corruption not only because we have a legal duty to do so, but because it supports our commitment to conduct business ethically and honestly. All colleagues are strictly prohibited from either directly or indirectly offering, accepting, paying or soliciting bribes of any description. This prohibition includes any form of facilitation payment (or kickback). Colleagues must always be aware that decisions are only to be made which are in the best interests of the company and that conflicts of interest, if they arise, must therefore be monitored. Colleagues are clear, through the training provided to all relevant personnel, that any decision which has been influenced by personal gain is forbidden." Upholding our standards of ethical behaviour also extends to ensuring we do not engage in anti-competitive behaviour: collusion with potential competitors, with the purpose of limiting the effects of market competition. This can include fixing prices or coordinating bids, creating market or output restrictions, imposing geographic quotas, and allocating customers, suppliers, geographic areas, or product lines. Greencore is aware that this type of behaviour can erect barriers for entry to the sector within which we operate, or to otherwise prevent competition and can include unfair business practices, abuse of market position, cartels, anti-competitive mergers, and price-fixing. "We are determined to uphold good practices. Being transparent in relation to the controls we put in place to prevent such behaviour is vital. We are committed to ensuring that we comply with all aspects of competition and anti-trust laws and our Competition Law Compliance Policy sets out how we do this in practice. In particular, we strive to avoid any activity or practice that seeks to: fix or control pricing, credit terms, discounts or rebates; boycott certain customers or suppliers; limit the manufacture or sale of any product or service; and/or allocate contract, markets, customers or territories. We therefore do not engage in deceptive or unfair trade practices and we aim to deal fairly and honestly with our suppliers and customers to sustain our competitive advantage through the provision of excellent products and services. Training is provided to relevant personnel to ensure continued success through ethical and fair trading." We recognise that taxes are important sources of government revenue and are central to the fiscal policy and macroeconomic stability of countries. Greencore, like all organisations, have an obligation to comply with tax legislation, and a responsibility to our stakeholders to meet expectations of good tax practices. We ensure we uphold good practices in relation to tax, and this includes not facilitating others within our value chain to evade tax. c. i. "As set out in our Code, we have appropriate policies and procedures in place to educate all relevant staff on their obligations in this in relation to anti-tax evasion. a. Our Group Tax Strategy is overseen by the Greencore Group plc. Board. This incorporates our Anti-Tax Evasion and Anti-Tax Evasion Facilitation Policy having particular regard to the anti-tax evasion laws introduced in the Criminal Finances Act and the Finance Act in 2016. The application of this policy is overseen by our Group Tax unit in consultation with the Group Secretariat and Legal department. Tax compliance is incorporated within the day to day work of Group Finance. Our Senior Group Tax Manager is directly responsible for tax and is supported by other members of the finance team and external advisors. Our Senior Group Tax Manager reports on tax matters to our Group Financial Controller who, in turn, reports to our Chief Financial Officer. The tax strategy ensures that Greencore operates a responsible approach to the management of taxes in the jurisdictions in which it operates. Paying and collecting the right amount of taxes at the right time is an important part of the Group's role as a business and contribution to society and the tax strategy supports the Group's overall business strategy in that regard. Greencore considers tax governance and tax compliance to be important elements of its oversight and risk management systems, whilst recognising the need to protect shareholder value through making appropriately risk assessed decisions in all areas of taxation." c. vi. We want our employees, contractors, vendors, third parties and other stakeholders to feel comfortable about speaking up whenever they have a question or concern about our Code, or if they see something that they feel is unethical, unsafe or otherwise wrong. Concerns and enquiries can be raised through multiple channels: with line managers or other senior leaders, supporting teams, including human resources, Legal and Compliance and through work councils. Concerns can also be raised anonymously via a dedicated hotline run independently by NAVEX Global. This hotline is operated 24/7, 365 days of the year. All internal stakeholders are encouraged to raise any, or any suspected, issues with their line managers. If this is not possible, for whatever reason, employees are encouraged to report issues to the Business Unit Director or the Head of Legal and Compliance. As an alternative, if an individual (either internal or external) wishes to raise an issue outside of their channels, that person can use the independently run hotline.	

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Material topics | 200 series (Economic topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-3 Evaluation of the management approach	For GRI 205: Anti-Corruption 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	a. i. To manage and evaluate our approach to business ethics, our Risk Management team (Internal Audit) carry out site visits to ascertain awareness of policies and procedures at site level. Business Unit Directors ensure appropriate personnel are identified for anti-bribery, corruption, anti-tax evasion and other compliance training. Every business and every function in the business is captured under these processes.	
GRI 205: Anti-Corruption 2016	205-1 Operations assessed for risks related to corruption	a. Total number and percentage of operations assessed for risks related to corruption. b. Significant risks related to corruption identified through the risk assessment.	a. The Risk Management Group ("RMG") review each business unit and, on a biannual basis each major function (Purchasing, HR, Commercial and Finance), across the Greencore Group. In carrying out these Internal Audit reviews, RMG are able to identify any breach of policy and would then follow up that breach in more detail to identify the root cause. We assess for corruption related risks as part of this review. In addition to the independent work undertaken by the RMG each Business within the Group carries out a self-assessment each year as part of the Group's Corporate Governance process, this assessment tests the Businesses understanding of the policy (such as the Business Code of Conduct) and its ability to comply with it. b. No material breaches in policy have been identified during the work undertaken by RMG to date.	
	205-3 Confirmed incidents of corruption and actions taken	a. Total number and nature of confirmed incidents of corruption. b. Total number of confirmed incidents in which employees were dismissed or disciplined for corruption. c. Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption. d. Public legal cases regarding corruption brought against the organisation or its employees during the reporting period and the outcomes of such cases.	a. Due to Greencore's control processes, Greencore was informed of a non-material incident of fraud involving employees of a third party supplier. There was no financial loss to Greencore and the third party supplier has since improved its own processes to prevent any further such activity. b. 0. c. 0. d. 0.	
Anti-competitive behaviour				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 206: Anti-Competitive Behaviour 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. Where the impacts occur; ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	Description of management approach for GRI 205: Anti-Corruption, GRI 207: Tax and GRI 206: Anti competitiveness have been combined under GRI 205: Anti-Corruption.	

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Material topics | 200 series (Economic topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location

GRI 103: Management Approach 2016	103-2 The management approach and its components	For GRI 206: Anti-Competitive Behaviour 2016, the reporting organisation shall report the following information:
		a. An explanation of how the organisation manages the topic.
		b. A statement of the purpose of the management approach.
		c. A description of the following, if the management approach includes that component:
		   i. Policies;
		   ii. Commitments;
		   iii. Goals and targets;
		   iv. Responsibilities;
		   v. Resources;
		   vi. Grievance mechanisms;
		   vii. Specific actions, such as processes, projects, programmes and initiatives.
			Description of management approach for GRI 205: Anti-Corruption, GRI 207: Tax and GRI 206: Anti-Competitive Behaviour have been combined under GRI 205: Anti-Corruption.	

	103-3 Evaluation of the management approach	For GRI 206: Anti-Competitive Behaviour 2016, the reporting organisation shall report the following information:
		a. An explanation of how the organisation evaluates the management approach, including:
		   i. the mechanisms for evaluating the effectiveness of the management approach;
		   ii. the results of the evaluation of the management approach;
		   iii. any related adjustments to the management approach.
			Description of management approach for GRI 205: Anti-Corruption, GRI 207: Tax and GRI 206: Anti-Competitive Behaviour have been combined under GRI 205: Anti-Corruption.	

GRI 206: Anti-Competitive Behaviour 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	a. Number of legal actions pending or completed during the reporting period regarding anti-competitive behaviour and violations of anti-trust and monopoly legislation in which the organisation has been identified as a participant.	0.	
Tax				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 207: Tax 2019, the reporting organisation shall report the following information:
		a. An explanation of why the topic is material.
		b. The Boundary for the material topic, which includes a description of:
		   i. where the impacts occur;
		   ii. the organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		c. Any specific limitation regarding the topic Boundary.
			Description of management approach for GRI 205: Anti-Corruption, GRI 207: Tax and GRI 206: Anti-Competitive Behaviour have been combined under GRI 205: Anti-Corruption.	

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Material topics | 200 series (Economic topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location

GRI 103: Management Approach 2016	103-2 The management approach and its components	For GRI 207: Tax 2019, the reporting organisation shall report the following information:
		
		a. An explanation of how the organisation manages the topic.
		
		b. A statement of the purpose of the management approach.
		
		c. A description of the following, if the management approach includes that component:
		
		  i. Policies;
		
		  ii. Commitments;
		
		  iii. Goals and targets;
		
		  iv. Responsibilities;
		
		  v. Resources;
		
		  vi. Grievance mechanisms;
		
		  vii. Specific actions, such as processes, projects, programmes and initiatives.
			Description of management approach for GRI 205: Anti-Corruption, GRI 207: Tax and GRI 206: Anti-Competitive Behaviour have been combined under GRI 205: Anti-Corruption.	

	103-3 Evaluation of the management approach	For GRI 207: Tax 2019, the reporting organisation shall report the following information:
		
		a. An explanation of how the organisation evaluates the management approach, including:
		
		  i. The mechanisms for evaluating the effectiveness of the management approach;
		
		  ii. The results of the evaluation of the management approach;
		
		  iii. Any related adjustments to the management approach.
			Description of management approach for GRI 205: Anti-Corruption, GRI 207: Tax and GRI 206: Anti-Competitive Behaviour have been combined under GRI 205: Anti-Corruption.	

GRI 207: Tax 2019	207-1 Approach to tax	a. A description of the approach to tax, including:
		
		  i. Whether the organisation has a tax strategy and, if so, a link to this strategy if publicly available;
		
		  ii. The governance body or executive-level position within the organisation that formally reviews and approves the tax strategy, and the frequency of this review;
		
		  iii. The approach to regulatory compliance;
		
		  iv. How the approach to tax is linked to the business and sustainable development strategies of the organisation.
			i. Greencore Group plc has a publicly available tax strategy, published on the group's external website;
			
			ii. The Board of Directors formally reviews and approves the tax strategy on an annual basis;
			
			iii. The Group is open and transparent with tax authorities and is compliant with all regulatory authorities;
			
			iv. The Group's approach to tax is driven by commercial and economic activities undertaken by the Group.	

	207-2 Tax governance, control, and risk management	a. A description of the tax governance and control framework, including:
		
		  i. The governance body or executive-level position within the organisation accountable for compliance with the tax strategy;
		
		  ii. How the approach to tax is embedded within the organisation;
		
		  iii. The approach to tax risks, including how risks are identified, managed, and monitored;
		
		  iv. How compliance with the tax governance and control framework is evaluated.
			i. Compliance with the tax strategy is ultimately the responsibility of the Greencore Group plc Board, with the CFO specifically responsible for taxation;
			
			ii. Periodic training is carried out for relevant individuals. Anti-tax evasion policies and procedures are available on the intranet for all employees and the Group Tax Strategy is publicly available on the external website;
			
			iii. Tax risks are identified and monitored both by the finance / tax function as part of the annual reporting process and by Group risk as part of their BICQ review process;
			
			iv. Group Risk evaluate compliance as part of the annual BICQ process which highlights any shortfalls in the control framework.	

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Material topics | 300 series (Environmental topics)

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
Materials				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 301: Materials 2016, the reporting organisation shall report the following information:
		a. An explanation of why the topic is material.
		b. The Boundary for the material topic, which includes a description of:
		  i. Where the impacts occur;
		  ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		c. Any specific limitation regarding the topic Boundary.
			a. and b. Packaging is necessary to keep our products safe and fresher for longer. By helping our consumers dispose of it correctly, we can ensure the materials we use can be recycled and used again in the supply chain. We strive to make our packaging more circular and climate smart. That means finding alternatives to fossil fuel based materials like plastics, but also ensuring that any alternative materials we source, such as wood, paper or board are deforestation-free. Our policy is to only use plastic when necessary and where the benefits of doing so outweigh the risks of not doing so. By 2025, our goal is to ensure all our plastic packaging can be easily recycled or reused while also eliminating single use plastics.
			
			b.i. The issue of packaging waste, notably plastic waste, is of particular public concern. However, packaging is necessary for food safety and quality, protecting food in transportation, extending its shelf life and reducing food waste. While it plays an important role in reducing food waste, packaging also has a negative impact in relation to climate change and the negative impacts at its end of life.
			
			ii. This makes packaging a unique challenge for Greencore. We must develop solutions that reduce packaging volume and impact, without compromising on protection. We envision a future without waste, and this means not only increasing plastic recycling, but also identifying alternatives. We are acutely aware of the causes and consequences of the linear "take-make-dispose" model and want to change it.	

	103-2 The management approach and its components	For GRI 301: Materials 2016, the reporting organisation shall report the following information:
		a. An explanation of how the organisation manages the topic.
		b. A statement of the purpose of the management approach.
		c. A description of the following, if the management approach includes that component:
		  i. Policies;
		  ii. Commitments;
		  iii. Goals and targets;
		  iv. Responsibilities;
		  v. Resources;
		  vi. Grievance mechanisms;
		  vii. Specific actions, such as processes, projects, programmes and initiatives.
			a. We have identified materials, with a specific focus on packaging, as a key issue for Greencore. Whenever we develop new packaging for products, we continually question whether we are producing it in the best way possible.
			
			b. We want our packaging to have the lowest possible planetary impact, and will rely on science to assess the whole life cycle of our packaging.
			
			c. i. We have a newly adopted group wide Sustainable Packaging Policy, focused around the delivery of this sustainability strategy commitment. Our policy implementation is delivered through our sustainability governance structure, specifically in this case via our Sustainable Business Management Group ("SBMG") for Sustainable Packaging.
			
			iv. This is attended by our Purchasing team, Sustainability team and Packaging Development teams. We have established structures to manage data and key performance indicators through which the committee evaluate our ongoing performance in relation to packaging.
			
			ii. Greencore is aligned with the principles of the UK Plastics Pact (through our membership of the Chilled Food Association who are signatories), and are working towards the following commitments, within our Sustainable Packaging Policy:
			  • By 2025, ensure 100% of our plastic packaging is designed to be reusable or recyclable
			  • By 2025, eliminate problematic or unnecessary single use plastic packaging
			  • By 2025, ensure we have an average of 30% recycled content across all plastic packaging.
			
			vii. We are also working to make reusable and recyclable plastic packaging the norm so the materials used can keep cycling through the system at their highest possible value. That begins by making it technically possible for all our plastic packaging to be reused or recycled.
			
			Our key focus currently is sustainable sandwich packaging. We are aiming to reduce the plastic content of our packaging, alongside maximising recyclability, to ensure a recyclable pack with no impact on product shelf life.
			
			vi. Grievances relating to consumer packaging will be raised through our customer complaints mechanism, rather than directly from the consumer. These are mainly related to packaging quality complaints rather than sustainable packaging considerations.
			
			*Note, we have applied the GRI topic of Materials specifically to the scope of product packaging.	

	103-3 Evaluation of the management approach	For GRI 301: Materials 2016, the reporting organisation shall report the following information:
		a. An explanation of how the organisation evaluates the management approach, including:
		  i. the mechanisms for evaluating the effectiveness of the management approach;
		  ii. the results of the evaluation of the management approach;
		  iii. any related adjustments to the management approach.
			We have a newly adopted group wide Sustainable Packaging Policy, focused around the delivery of this sustainability strategy commitment. Our policy implementation is delivered through our sustainability governance structure, specifically in this case via our Sustainable Packaging SBMG.
			
			This is attended by our Purchasing team, Sustainability team and Packaging Development teams. We have established structures to manage data and key performance indicators through which the committee evaluate our ongoing performance in relation to packaging.	

GRI 301: Materials 2016	301-1 Materials used by weight or volume	a. Total weight or volume of materials that are used to produce and package the organisation's primary products and services during the reporting period, by:
		  i. Non-renewable materials used;
		  ii. Renewable materials used.
			a. i. Non-renewable, glass, plastic, aluminium, steel, others = 70,066 tonnes;
			
			ii. Renewable materials, paper, board, wood = 28,209 tonnes.	

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Material topics | 300 series (Environmental topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
Energy				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 302: Energy 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. Where the impacts occur; ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	a. The United Nations has been clear and indicated we could have just 10 years left to limit a climate change catastrophe; a decade of action is required. This decade – and our collective response to the climate emergency - is make or break. The risks associated with a changing climate pose a serious threat, not only to our direct operations but also to our supply chain. That's why we are taking action and are committed to becoming a Net Zero carbon business. b. To drive a clear pathway to this objective, we have committed to setting science based targets, externally verified to the SBTi. We have set bold commitments and made good progress to date and we have reduced our total net carbon Scope 1 and 2 emissions by 30% from FY18. i. Direct emissions are directly caused by our consumption of energy within our manufacturing and distribution operations. ii. All of our manufacturing operations use both fossil fuels (mainly natural gas) and electricity. Electricity for our UK operations is from 100% certified renewable sources. We also operate fleets of vehicles for the distribution of product. b. and c. Two other key sources of Scope 1 emissions for Greencore are refrigerant gases and vehicle emissions from our fleet.	
	103-2 The management approach and its components	For GRI 302: Energy 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	a. The primary focus of our activities is on the mitigation of negative impacts associated with greenhouse gas emissions that result from our energy usage. b. We are directly responsible for emissions relating to energy consumption in our own operations (manufacturing, distribution and fleet cars). We are also directly responsible for our procurement of energy, although they are considered indirect emissions (Scope 2). c. i. Emissions, energy and water use are incorporated into our wider Operational Environmental Policy, which is aligned with the ISO 14001 Environmental Management Standard. Responsibility for the monitoring and implementation of this policy is managed through our sustainability governance structure, specifically the Environment Committee. ii. To drive progress towards our goals, we have commitments to driving energy efficiency in all aspects of the business. We have a commitment in place to be a Net Zero business by 2040 for our Scope 1 and 2 emissions. To drive a clear pathway to this objective, we have committed to a SBT, externally verified by the SBTi. "Greencore Group plc. commits to reduce absolute Scope 1 and 2 GHG emissions 46.2% – by 2030 from a 2019 base year." vii. Refrigerant gas fugitive emissions are managed through the gradual phase out of high global warming potential refrigerants (aligning to both the F-Gas Regulations and BAT9 for the pending Environment Permit changes following publication of the revised Best Available Techniques ("BAT") Reference Document in December 2019) and good maintenance on existing refrigeration systems to minimise leakage. Our greenhouse gas emissions inventory is currently collated and reviewed annually. This includes carbon dioxide and refrigeration emissions, but not specifically other pollutants such as nitrogen oxides.	
	103-3 Evaluation of the management approach	For GRI 302: Energy 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	a. i. We undertake regular audits to identify energy saving opportunities and we have developed an internal tool, a Utilities Best Practice Guide, with an external energy efficiency expert (and Energy Savings Opportunity Scheme lead assessor). ii. This tool guides and informs our manufacturing sites on the best energy efficiency technologies to adopt and how to optimise the energy efficiency of existing equipment. We have incorporated all energy audit actions, along with energy efficiency performance data, into a monthly reporting process for review by our central management teams. We continue to evaluate our approach and performance in these areas. iii. We use management systems to evaluate our approach and performance on energy and emissions. We have worked with a single site as a pilot project this year to determine a Net Zero roadmap and to develop a tactical plan for delivering the roadmap.	

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Material topics | 300 series (Environmental topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location

GRI 302: Energy 2016	302-1 Energy consumption within the organisation	a. Total fuel consumption within the organisation from non-renewable sources, in joules or multiples, and including fuel types used.
		b. Total fuel consumption within the organisation from renewable sources, in joules or multiples, and including fuel types used.
		c. In joules, watt-hours or multiples, the total:
		  i. Electricity consumption;
		  ii. Heating consumption;
		  iii. Cooling consumption;
		  iv. Steam consumption.
		d. In joules, watt-hours or multiples, the total:
		  i. Electricity sold;
		  ii. Heating sold;
		  iii. Cooling sold;
		  iv. Steam sold.
		e. Total energy consumption within the organisation, in joules or multiples.
		f. Standards, methodologies, assumptions, and/or calculation tools used.
		g. Source of the conversion factors used.
			a. FY21 = 319,353 MWh (Natural gas, diesel, gas oil, LPG, petrol, no kerosene in FY21).
			b. FY21 = 1,960 MWh (biogas from AD plant at Selby), generating 601 MWh renewable electricity, consumed on site.
			c. FY21 = 103,053 MWh.
			d. FY21 = 327 MWh (CHP engine generated electricity from Kiveton exported to grid).
			e. 424,366 MWh.
			f. Data collated from site KPI spreadsheets or annual information requests. Compiled in FY21 Data Review Matrix spreadsheet and carbon footprint tool from SLR consulting.
			g. UK Government factors for company GHG reporting.	

	302-3 Energy intensity	a. Energy intensity ratio for the organisation. b. Organisation-specific metric (the denominator) chosen to calculate the ratio. c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all. d. Whether the ratio uses energy consumption within the organisation, outside of it, or both.	a. FY21 = 1,315 kWhp/tonne production (primary energy [grid electricity x 2.6] per tonne of production). b. FY21 = 354,977 tonnes production. c. All (electricity and fossil fuels for manufacturing — only includes manufacturing energy consumption, not distribution or vehicles). d. Inside.	
Water and effluents				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 303: Water and Effluents 2018, the reporting organisation shall report the following information:
		a. An explanation of why the topic is material.
		b. The Boundary for the material topic, which includes a description of:
		  i. Where the impacts occur;
		  ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		c. Any specific limitation regarding the topic Boundary.
			a. Water is essential for our operations and supply chain. As the climate changes, water-related issues will continue to grow in importance. While this is a global issue, the impacts are felt on a very local level, with droughts in some localities and flooding in others. As water is an essential part of our food manufacturing processes, we are a significant consumer of water within our manufacturing operations.
			We annually assess the water-related risks at our facilities, combining the level of water stress in the regions where we operate and our water use, to determine the factories where water issues matter most.
			The primary source of consumption of water within our manufacturing operations arises from heating, cooling, steam generation and hygiene operations, which in turn generate significant quantities of trade effluent. The discharge of chemicals and sediments into rivers can damage the natural environment. We therefore have standards and controls in place to manage the impact of potential pollutants on water quality by ensuring we adhere to our Trade Effluent Discharge consents with our various regulators (the water wholesalers, such as Yorkshire Water) across the different regions of our manufacturing facilities.
			The majority of our total water footprint comes from agricultural activities within our supply chains. It is by focusing our efforts here that we can have the greatest impact. To be clear, this is a new workstream for us.
			b. Our activity to date on water risk has focussed on our own operations.
			c. We are starting to risk assess our supply base for a range of environmental risk factors, including water. We will analyse our key supply chains to understand their exposure to water risk, including their overlap with environmentally sensitive river basins, and will work up how we work with key suppliers to improve the water efficiency of their activities, tailoring efforts to address the specific water management needs of various locations. Our risk assessment process will also include the following assessments, although these have not been completed during FY20-21 and will be a focus for FY21-22:
			• Climate risk - Germanwatch Global Climate Risk Index
			• Water - WWF Water Risk Filter
			• Biodiversity - Yale / WEF Environmental Performance Index.	

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Material topics | 300 series (Environmental topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-2 The management approach and its components	For GRI 303: Water and Effluents 2018, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	a. and b. included in GRI 303 103-1 above. i. At policy level, water management is a key element of our 'Operational Environmental Policy'. iv. The policy is owned and managed via our sustainability governance structure, specifically our Environment & Food Waste Committee. Water management standards are built into our Safety, Health & Environmental Management System to ensure a consistent approach to the management of water across our manufacturing base. vii. We have annual water intensity targets in place and monitor our site water usage closely.	
	103-3 Evaluation of the management approach	For GRI 303: Water and Effluents 2018, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	a. i. We have annual water sustainability targets in place based on past performance combined with relevant capital investments and monitor our manufacturing site water usage on a monthly basis within a Group Operational Forum. Within this forum, we track trends and challenge any high consumption rates, requiring site investigations if necessary. Several manufacturing sites have AMRs (automated meter readings) on their main incoming meters that facilitate closer examination.	
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	a. A description of how the organisation interacts with water, including how and where water is withdrawn, consumed, and discharged, and the water-related impacts caused or contributed to, or directly linked to the organisation's activities, products or services by a business relationship (e.g. impacts caused by runoff). b. A description of the approach used to identify water-related impacts, including the scope of assessments, their timeframe, and any tools or methodologies used. c. A description of how water-related impacts are addressed, including how the organisation works with stakeholders to steward water as a shared resource, and how it engages with suppliers or customers with significant water-related impacts. d. An explanation of the process for setting any water-related goals and targets that are part of the organisation's management approach, and how they relate to public policy and the local context of each area with water stress.	a. Water is an essential part of our food manufacturing processes, used in cleaning and hygiene for food safety, cooling processes, steam raising plants and as a raw ingredient. b. c. and d. For borehole abstraction, the relevant sites measure on a continuous basis the water abstracted and measure the impact on aquifer levels in observation boreholes, as agreed and jointly monitored by the Environment Agency within the framework of their respective abstraction licences. The water usage maximum daily demands are closely monitored by both site (water loggers) and water wholesaler. Any potential breaches would trigger alerts and appropriate actions. The introduction of Group Environmental Standards (Env 200 standards) details each site to conduct an individual water balance, to ascertain more accurately their site impact on water consumption. In relation to discharge, we employ the professional services of a third party to manage the effluent treatment plant and subsequent discharge to river, which includes the provision of permanent operators on site. One of the key stakeholders is the Environment Agency. The majority of our sites have Environment Permits with specific reporting requirements, including water consumption metrics. In addition, two of our sites closely liaise with the Environment Agency in regard to the terms of water abstraction licences. Our key retail customers also require us to report on water consumption on a regular basis. We also complete the annual Carbon Disclosure Project ("CDP") Water Security disclosure. We have eight sites situated within regions of the country that are subject to concern regarding water stress as classified by the EA as recently as 2021. For the three sites within the Anglian Water region, this results in close monitoring of their water usage maximum daily demand by the business and relevant retailer. Sites with abstraction licences have had the appropriate investment in measurement and monitoring equipment to facilitate abstraction management. c. All manufacturing sites import potable water from their respective regional wholesaler, but two of our sites, Selby and Warrington, abstract borehole water from an aquifer and manufacture potable water themselves, which accounts for the vast majority of water they consume. We have sites within the East Anglia region that are subject to Maximum Daily Demand ("MDD") restrictions, whereby water consumption needs to be very closely monitored given the financial incentives / penalties involved. Borehole abstractions are regulated by licence with the Environment Agency and subject to restrictive clauses to ensure conservation of this natural resource. The vast majority of our manufacturing sites discharge trade effluent direct to sewer, with the only exception being our Selby site, which uses the services of a third party to manage the on-site effluent treatment plant to treat effluent to a high standard, prior to discharge to river under their river discharge consent.	

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Material topics | 300 series (Environmental topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 303: Water and Effluents 2018	303-2 Management of water discharge-related impacts	a. Description of any minimum standards set for the quality of effluent discharge, and how these minimum standards were determined, including: i. How standards for facilities operating in locations with no local discharge requirements were determined; ii. Any internally developed water quality standards or guidelines; iii. Any sector-specific standards considered; iv. Whether the profile of the receiving waterbody was considered.	i. All site discharges of effluent to sewer are subject to consent via the local sewerage undertaker. All sites hold a trade effluent consent, containing specific requirements for monitoring and treatment of effluent. ii. Our internal safety, health and environmental management system (SHEMS) details effluent standards for our sites to follow (Env 200 standards). iii. Sector specific standards are in place for sites regulated under PPC Regulations and who hold a PPC Permit. This is in addition to controls stipulated within trade effluent consents. iv. The profile of the receiving water body is considered by the Regulator when imposing specific restrictions within granted licenses.	
	303-3 Water withdrawal	a. Total water withdrawal from all areas broken down by: i. Surface water; ii. Groundwater; iii. Seawater; iv. Produced water; v. Third party water. b. Total water withdrawal from all areas with water stress broken down by: i. Surface water; ii. Groundwater; iii. Seawater; iv. Produced water; v. Third party water. c. Breakdown of total water withdrawal from sources listed in a), by: i. Freshwater (≤1,000 mg/L Total Dissolved Solids); ii. Other water (>1,000 mg/L Total Dissolved Solids). d. Contextual information to aid understanding.	a. For FY21 only sections ii. and v. apply. i. 0; ii. Total groundwater = 864,832 m^3; iii. 0; iv. 0 (Selby = 479,884 m^3, Warrington = 384,948 m^3); v. Third party water = 1,512,853 m^3. b. FY21 = 675,616 m^3 The total is all allocated to Third Party water and no other areas. c. i. 100%; ii. 0%. d. We use abstracted borehole water (groundwater) as a source of raw water. We treat this raw water on these two sites (Selby and Warrington) to convert it to potable water. We have not included the former as 'produced water', we have only inputted the raw abstraction borehole figures. We have assumed 'third party water' is the potable water that we purchase and import to sites from water supply companies (water wholesalers). We have assumed water stress areas as determined by the UK Environment Agency report titled *Water stressed areas - final classification 2021*.	
	303-5 Water consumption	The reporting organisation shall report the following information: a. Total water consumption from all areas in megaliters. b. Total water consumption from all areas with water stress in megaliters. c. Change in water storage in megaliters, if water storage has been identified as having a significant water-related impact. d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modeled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors.	a. FY21 = 2,377,685 m^3. b. FY21 = 675,616 m^3. c. FY21 = None. d. Data collated from site KPI spreadsheets. Compiled in FY21 Data Review Matrix spreadsheet.	

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Material topics | 300 series (Environmental topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
Biodiversity				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 304: Biodiversity 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. Where the impacts occur; ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	a. Knowing more about where our ingredients come from and how they are produced will enable us to address some of the biggest environmental and social issues our planet faces such as climate change, deforestation and human rights. How we source has a direct economic and reputational impact on our business. A secure supply of high-quality agricultural ingredients is essential to ensuring the long-term sustainability of our business. Our responsible sourcing programme plays a key role toward achieving this. It helps us to know where our ingredients come from and how they are produced, and to address environmental and social issues such as deforestation, human rights, and animal welfare. Greencore operates a global supply chain on a significant scale. The increasing demand for food poses great challenges to the industry. Growing pressure on diminishing resources and poor global stewardship could increase our costs, restrict our access to key raw materials and commodities and make our global supply chains more volatile. In addition, customers are increasingly choosing healthier options and demanding information and reassurance of the origin and content of their food. We rely on natural resources to supply all the raw materials we need to produce our high quality products, so these issues affect us directly. Raw materials, packaging and other items are purchased from a global supply chain, which include particular high-risk raw materials such as soy and palm oil. b. While Greencore operates manufacturing sites and distribution depots throughout the UK, and all of these can have a local impact on biodiversity, the most significant impacts associated with biodiversity relate to Greencore purchasing and our global supply chain. c. We recognise the importance of increasing our action on biodiversity in our supply chain, and we need to build a detailed understanding and analysis of the risks to biodiversity that feature in our supply base.	
	103-2 The management approach and its components	For GRI 304: Biodiversity 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	c. i. and iv Responsibility for responsible sourcing is set within our Policies for Sustainable Sourcing & Human Rights. We review and monitor our Responsible Sourcing Policies via our sustainability governance structure, specifically through the Responsible Sourcing Committee. a. and c. vii. We are focusing on priority ingredients that carry the greatest sourcing risks from three areas — forest, fisheries, and field. It is not possible to have a 'one-size-fits-all' approach to ingredients. Each individual supply chain comes with its own challenges around biodiversity, climate change, water scarcity, deforestation and animal welfare. We have differing levels of control and influence on our supply chains, depending on whether it is a primary raw material or a traded commodity. Our approach to each is informed by the results of individual raw materials risk assessments. We are making judgements around what specific issues and levels of risk are important considerations for each ingredient, and how the proposed mechanisms of control mitigate those identified risks. By 2030, we aim to responsibly source 100% of our priority raw materials. In order to achieve this aim, we need to define both "responsibly sourced" and "priority raw materials"; we do this within our Responsible Sourcing Policy and through a process of risk assessment. We have developed a comprehensive sustainability risk assessment model that enables us to see and take action on hotspots in our supply chains, and to ensure we are minimising our footprint in those areas. Our list of highest priority ingredients includes: Poultry, beef, dairy, cooked meats, rice, vegetables and whole head vegetables, tuna, prawns, herbs & spices, eggs and alternative proteins. Where feasible, we will look to shorten our supply chains to aid our transparency drive. This includes reviewing and exploring opportunities to procure more domestic ingredients and sub-ingredients. However, there are limitations to doing so, due to availability and supply issues. We believe that certification remains the best route for us to work with our supply base to ensure the highest sourcing standards. We are members of the RSPO and report annually on our progress. 95% of our palm oil comes from Roundtable on Sustainable Palm Oil ("RSPO"), with the remaining 5% from RSPO Palm Trace Credits. We use soy products (soy sauce and edamame beans) directly as an ingredient in very small quantities, and indirectly in our supply chains, primarily within animal feed. As a high protein bean, it's a key ingredient in some animal diets, particularly for pigs, poultry and farmed fish. c. iii. Our ambition is that all soy used as animal feed in our global supply chain is sourced from areas which are verified as zero deforestation, with a target to source 100% deforestation free and conversion free physical soy embedded in our supply chain by 2025. We continue to build on our efforts to promote responsible fishing. All of the cold water prawns we source are Marine Stewardship Council ("MSC") certified, and our farmed warm water prawns are third party certified Best Aquaculture Practices ("BAP") 4*. In FY21, 99% of our tuna was either sourced from pole and line fishing, MSC certified fisheries or from those with a Fishery Improvement Project ("FIP") in place. Environmental transparency is important to us so we report on progress annually through CDP surveys relating to climate change, forests and water. Our CDP ranking for 2021 has not been published as yet.	
	103-3 Evaluation of the management approach	For GRI 304: Biodiversity 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	Environmental transparency is important to us so we report on progress annually through CDP (Carbon Disclosure Project) surveys relating to climate change, water and forests. This year we have reported on ODP (Ocean Disclosure Project) for the first time. By 2030 we aim to responsibly source 100% of our priority raw materials. In order to achieve this aim, we need to define both "responsibly sourced" and "priority raw materials"; we define both within our Responsible Sourcing Policy and through a process of risk assessment. We are focusing on priority ingredients that carry the greatest sourcing risks from three areas — forest, fisheries and field. It is not possible to have a one-size-fits-all approach to ingredients. Each individual supply chain comes with its own challenges around biodiversity, climate change, water scarcity, deforestation and animal welfare.	

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Material topics | 300 series (Environmental topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	304-2 Significant impacts of activities, products, and services on biodiversity	The reporting organisation shall report the following information: a. Nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following: i. Construction or use of manufacturing plants, mines, and transport infrastructure; ii. Pollution (introduction of substances that do not naturally occur in the habitat from point and non-point sources); iii. Introduction of invasive species, pests, and pathogens; iv. Reduction of species; v. Habitat conversion; vi. Changes in ecological processes outside the natural range of variation (such as salinity or changes in groundwater level). b. Significant direct and indirect positive and negative impacts with reference to the following: i. Species affected; ii. Extent of areas impacted; iii. Duration of impacts; iv. Reversibility or irreversibility of the impacts.	We believe that certification remains the best route for us to work with our supply base to ensure the highest sourcing standards. Forest Palm Oil; We are members of the RSPO and report annually on our progress. We are increasingly moving towards segregated supply only and are committed to use only RSPO certified food ingredients from a segregated supply chain model. In 2020, the vast majority (95%) of palm oil in our food products is from RSPO segregated or mass balance supply; 79% segregated, 16% mass balance, with 5% from credits. Soy; We use soy products (soy derivatives and edamame beans) directly as an ingredient in very small quantities, and indirectly in our supply chains, primarily within animal feed. As a high protein bean, it's a key ingredient in some animal diets, particularly for pigs, poultry and farmed fish. Our ambition is that all soy used as animal feed in our global supply chain is sourced from areas which are verified as zero deforestation, with a target to source 100% deforestation free and conversion free physical soy embedded in our supply chain by 2025. Fisheries We continue to build on our efforts to promote responsible fishing. All of the cold water prawns we source are Marine Stewardship Council ("MSC") certified, and our farmed warm water prawns are third party certified (Best Aquaculture Practices 'BAP' 4*). In FY21, 99% of our tuna was either sourced from pole and line fishing, MSC certified fisheries or from those with a Fishery Improvement Project ("FIP") in place. Field 100% of our fresh produce raw materials are grown in accordance to either Red Tractor (for the UK) or Global GAP (rest of the world) standards for Good Agricultural Practice which includes independent third party audits of farm level impacts on biodiversity.	
Emissions				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 305: Emissions 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. Where the impacts occur; ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	The description of management approach for Emissions is included under GRI 302: Energy.	
	103-2 The management approach and its components	For GRI 305: Emissions 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	The description of management approach for Emissions is included under GRI 302: Energy.	

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Material topics | 300 series (Environmental topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-3 Evaluation of the management approach	For GRI 305: Emissions 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	The description of management approach for Emissions is included under GRI 302: Energy.	
GRI 305: Emissions 2016	305-1 Energy Direct (Scope 1) GHG emissions	The reporting organisation shall report the following information: a. Gross direct (Scope 1) GHG emissions in metric tons of CO_2 equivalent. b. Gases included in the calculation; whether CO_2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all. c. Biogenic CO_2 emissions in metric tons of CO_2 equivalent. d. Base year for the calculation, if applicable, including: i. The rationale for choosing it; ii. Emissions in the base year; iii. The context for any significant changes in emissions that triggered recalculations of base year emissions. e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source. f. Consolidation approach for emissions; whether equity share, financial control, or operational control. g. Standards, methodologies, assumptions, and/or calculation tools used.	a. FY21 = 68,386 tCO_2e. b. CO_2e. c. There are no biogenic sources of CO_2e. d. Base year is FY19 (October 2018 - September 2019). i. ii. Scope 1 base year emissions: 60,952 tCO_2e; iii. FY19 base year emissions recalculated to exclude Premier Molasses and United Molasses which were sold in 2020. e. FY21 = UK Government GHG emissions factors for company reporting 2021. f. Operational control. g. Calculation tool produced by SLR Consulting.	
	305-2 Energy indirect (Scope 2) GHG emissions	The reporting organisation shall report the following information: a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO_2 equivalent. b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO_2 equivalent. c. If available, the gases included in the calculation; whether CO_2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all. d. Base year for the calculation, if applicable, including: i. The rationale for choosing it; ii. Emissions in the base year; iii. The context for any significant changes in emissions that triggered recalculations of base year emissions. e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source. f. Consolidation approach for emissions; whether equity share, financial control, or operational control. g. Standards, methodologies, assumptions, and/or calculation tools used.	a. FY21 = 21,892 tCO_2e. b. FY21 = 850 tCO_2e (Dublin office, DTS Exeter, DTS Inverness and Boston). c. CO_2e. d. Base year is FY19 (October 2018 - September 2019). i. ii. Scope 2 base year emissions: location based = 28,654 tCO_2e; iii. FY19 base year emissions recalculated to exclude Premier Molasses and United Molasses which were sold in 2020. e. FY21 = UK Government GHG emissions factors for company reporting 2021. f. Operational control. g. Calculation tool produced by SLR Consulting.	

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GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 305: Emissions 2016	305-4 GHG emissions intensity	The reporting organisation shall report the following information: a. GHG emissions intensity ratio for the organisation. b. Organisation-specific metric (the denominator) chosen to calculate the ratio. c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3). d. Gases included in the calculation; whether CO_2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.	a. FY21 = 0.068. b. FY21 = £1,324,800,000. c. Scope 1 + Scope 2. d. CO_2e.	
Waste				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 306: Waste 2020, the reporting organisation shall report the following information:
		a. An explanation of why the topic is material.
		b. The Boundary for the material topic, which includes a description of:
		  i. Where the impacts occur;
		  ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		c. Any specific limitation regarding the topic Boundary.
			a. Food waste is a global problem and highly material to our business. By reducing food waste, we can help improve food security and mitigate the effects of climate change, while driving efficiency benefits for the business.
			b. We are addressing food loss and waste across our entire value chain and strive to eliminate all types of waste at source. We redistribute surplus edible food products to feed people, where it is feasible to do so, and we segregate different waste streams across our sites to facilitate reuse and recycling, and avoid the use of landfill.
			b. i. and ii. While we view waste overall as material, we view food waste as highly material. By analysing our internal data, we identified food waste as a key driver in helping to reduce food scarcity and the associated impacts to climate change, whilst also realising cost savings. The combination of the ability to reduce our negative impact and its positive economic impact for Greencore, as well as its high importance to our stakeholders, make it a clear priority.
			c. None.	

	103-2 The management approach and its components	For GRI 306: Waste 2020, the reporting organisation shall report the following information:
		a. An explanation of how the organisation manages the topic.
		b. A statement of the purpose of the management approach.
		c. A description of the following, if the management approach includes that component:
		  i. Policies;
		  ii. Commitments;
		  iii. Goals and targets;
		  iv. Responsibilities;
		  v. Resources;
		  vi. Grievance mechanisms;
		  vii. Specific actions, such as processes, projects, programmes and initiatives.
			Collaborating to cut food waste;
			a. and b. included in GRI 306 103-1 above.
			c. ii. Greencore are signatories to the United Nations Friends of Champions 12.3, committing to a 50% absolute reduction in food waste by 2030, from a baseline year of FY17. We are working from a baseline of 42,180 tonnes of food waste generated through our manufacturing and distribution activities in FY17. This covers all Greencore's manufacturing facilities and distribution hubs.
			c. vii. Reporting on food waste;
			We publish our food waste report every year to ensure we are accountable for progress towards our targets. We measure our food waste against our production volumes on a monthly basis in order to evaluate our performance against our target of 50% reduction of food waste by 2030. Our FY17 baseline year figure for food waste generated from our operations was 9.52% of total food handled. This has decreased to 8.06% in FY21. The evaluation showed that we are making good progress towards our 2030 target of <4.76% food waste as a percentage of total food handled.
			b. Food waste in our own operations;
			While it is inevitable that some waste materials will be generated by the manufacturing process, we are focused on avoiding negative impacts rather than merely mitigating them. We are committed to the elimination and minimisation of waste at source and the application of the waste hierarchy. We actively encourage redistribution of food surplus to human consumption where feasible, and the source segregation of waste to facilitate the reuse and recycling of materials. We are committed to continuing to avoid the use of landfill as a disposal route and have achieved this target for the past three years.
			c. i. The management of waste and food surplus is incorporated into our broader 'Operational Environment Policy'.
			c. iv. The responsibility for the monitoring and implementation of this policy is managed through our sustainability governance structure, and specifically the Environment and Food Waste Committee.
			a. and c. vii. Food waste and surplus is managed by our central waste team, led by our Group Waste Manager. The central waste team collates waste data and manages any service or compliance issues. The team operates a central monitoring system that is populated with all waste movements, costs and tonnages. The system is used to track, trend and report waste data along with being an auditable system to show waste legislation compliance. The central waste team also provides site support on all aspects of waste, which includes waste minimisation, support with emerging technologies and training on compliance, legislation and waste handling requirements. We continually monitor emerging technologies and adopt these if they help reduce the impacts of any waste that is produced.
			Our Greencore Manufacturing Excellence ("GME") programme operates at each manufacturing site, whose aim is to reduce waste. Each site is allocated an annual waste disposal budget, which is set in accordance with the volumes and nature of waste arising at site. Within each site a Safety Health and Environment Manager monitors and reports on waste levels at their site. They are responsible for ensuring the safe handling, storage, pre-treatment and organisation of waste collections. To meet our 2030 target, we are carrying out a strategic review with our operations and GME teams to assess the best way to target the higher tonnage and value waste streams.	

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GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-3 Evaluation of the management approach	For GRI 306: Waste 2020, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	a. i. The central waste team collates waste data and manages any service or compliance issues. The team operates a central monitoring system that is populated with all waste movements, costs and tonnages. The system is used to track, trend and report waste data along with being an auditable system to show waste legislation compliance. The central waste team also provides site support on all aspects of waste, which includes waste minimisation, support with emerging technologies and training on compliance, legislation and waste handling requirements. We continually monitor emerging technologies and adopt these if they help reduce the impacts of any waste that is produced. Our Greencore Manufacturing Excellence ("GME") programme operates at each manufacturing site, whose aim is to reduce waste. Each site is allocated an annual waste disposal budget, which is set in accordance with the volumes and nature of waste arising at site. Within each site a Safety Health and Environment Manager monitors and reports on waste levels at their site. They are responsible for ensuring the safe handling, storage, pre-treatment and organisation of waste collections. To meet our 2030 target, we are carrying out a strategic review with our operations and GME teams to assess the best way to target the higher tonnage and value waste streams. The effectiveness of the management approach is now subject to a further annual external audit process. The first audit was carried out in November 2020 to assess the robustness of the data capture system and associated procedures. The Group Sustainability Team are responsible for recording and analysing the site waste data. As a result of the audit process, a site KPI reporting gap analysis and evidence pack has been issued to each site producing waste. This is to further ensure that all sites have documented waste data handling procedures in place. The evidence pack gives a clear audit trail to show that the waste data requirements are understood and provide evidence of how this is being implemented.	
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	The reporting organisation shall report the following information: a. For the organisation's significant actual and potential waste-related impacts, a description of: i. The inputs, activities, and outputs that lead or could lead to these impacts; ii. Whether these impacts relate to waste generated in the organisation's own activities or to waste generated upstream or downstream in its value chain.	Included in the description of GRI 306: Waste 2016.	
	306-2 Management of significant waste-related impacts	The reporting organisation shall report the following information: a. Actions, including circularity measures, taken to prevent waste generation in the organisation's own activities and upstream and downstream in its value chain, and to manage significant impacts from waste generated. b. If the waste generated by the organisation in its own activities is managed by a third party, a description of the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations. c. The processes used to collect and monitor waste-related data.	Included in the description of GRI 306: Waste 2016.	
	306-3 Waste generated	a. Total weight of waste generated in metric tonness, and a breakdown of this total by composition of the waste.	FY21 Total weight of waste generated — 55,547 MT. Wooden pallets — 4,206 MT. Animal feed — 4,913 MT. Cardboard — 4,704 MT. Plastics — 584 MT. Scrap metal — 1,215 MT. Organic waste to AD — 26,653 MT. General waste — 13,271 MT.	

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GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
Supplier environmental assessment				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 308: Supplier Environmental Assessment 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: 　i. Where the impacts occur; 　ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	a. Knowing more about where our ingredients come from and how they are produced will enable us to address some of the biggest environmental and social issues our planet faces such as climate change, deforestation and human rights. How we source has a direct economic and reputational impact on our business. Each year we procure ingredients from circa 350 suppliers. A secure supply of high-quality agricultural ingredients is essential to ensuring the long-term sustainability of our business. Our responsible sourcing programme plays a key role toward achieving this. It helps us to know where our ingredients come from and how they are produced, and to address environmental and social issues such as deforestation, human rights, and animal welfare. Greencore operates a global supply chain on a significant scale. The increasing demand for food poses great challenges to the industry. Growing pressure on diminishing resources and poor global stewardship could increase our costs, restrict our access to key raw materials and commodities and make our global supply chains more volatile. In addition, customers are increasingly choosing healthier options and demanding information and reassurance of the origin and content of their food. We rely on natural resources to supply all the raw materials we need to produce our high quality products, so these issues affect us directly. Raw materials, packaging and other items are purchased from a global supply chain, which include particular high-risk raw materials such as soy and palm oil. b. While Greencore operates manufacturing sites and distribution depots throughout the UK, and all of these can have a local impact on biodiversity, the most significant impacts associated with biodiversity relate to Greencore purchasing and our global supply chain. c. We recognise the importance of increasing our action on biodiversity in our supply chain, and we need to build a detailed understanding and analysis of the risks to biodiversity that feature in our supply base. We have undertaken carbon foot printing of our supply chain and find 94% of our total impact is from our supply chain (Scope 3 emissions). Of our Scope 3 emissions, 75% is from ingredients, and of our total ingredients, 48% is from proteins, demonstrating the importance of engagement with our supply chain.	
	103-2 The management approach and its components	For GRI 308: Supplier Environmental Assessment 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: 　i. Policies; 　ii. Commitments; 　iii. Goals and targets; 　iv. Responsibilities; 　v. Resources; 　vi. Grievance mechanisms; 　vii. Specific actions, such as processes, projects, programmes and initiatives.	Our prime method for assessing the environmental impact of our supply base is through our sustainability risk assessment model for ingredients. We have built a model to sit alongside our human rights risk assessment. Our sustainability risk model assesses ingredients for a range of issues and ranks them using known external databases. This provides us with the ability to see hotspots in our supply chain, although highlights theoretical risk rather than actual issues with individual supply: •　Animal welfare - Supplier certification schemes •　Carbon - Ecoinvent World Food LCA Database •　Deforestation - Supplier reporting on commodity use and origin, supported by 3Keel. Our risk assessment process will also include the following assessments, although these have not been completed during FY20-21 and will be a focus for FY21-22: •　Climate risk - Germanwatch Global Climate Risk Index •　Water - WWF Water Risk Filter •　Biodiversity - Yale / WEF Environmental Performance Index. Our risk assessment model helps us refine risk from our total ingredients list and gives us a big picture overview of risk. We use this to define our priority ingredients to focus attention on and perform deeper dive risk analysis. We have developed a new Responsible Sourcing Code of Conduct (the "Code"). This Code sets out the behaviours, practices and standards we expect from our suppliers. We recognise that responsible sourcing is a collaborative, network-wide effort – we want to put a focus on partnerships and shared learning. The Code will launch in FY22.	
	103-3 Evaluation of the management approach	For GRI 308: Supplier Environmental Assessment 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: 　i. The mechanisms for evaluating the effectiveness of the management approach; 　ii. The results of the evaluation of the management approach; 　iii. Any related adjustments to the management approach.	The results of our sustainability and human rights risk assessment process are fed into our overall responsible sourcing policy and subsequent strategy. We repeat our risk assessment process on an annual basis to update the risks. In FY22, we will improve our measurement of our most strategic suppliers of higher risk ingredients by asking them to comply with our new 'Responsible Sourcing Code of Conduct'. Once we have onboarded our highest risk suppliers, we will begin engagement with the group of next highest risk.	
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	The reporting organisation shall report the following information: a. Percentage of new suppliers that were screened using environmental criteria.	a. We currently don't screen our suppliers, we screen ingredients. We have built a risk assessment model to assess the sustainability risks associated with the ingredients we source and have embedded this, alongside our human rights risk assessment process, into our supply chain analysis. In addition we are developing a Responsible Sourcing Code of Conduct to roll out to key suppliers in FY22.	

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GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
Employment				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 401: Employment 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. Where the impacts occur; ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	a. Greencore is committed to being an employer of choice, and to build organisational capability where inspirational leaders support highly engaged people to deliver superior performance in a fair and rewarding environment. b. i. Greencore's key impact in relation to the labour market is through the engagement of agency workers. The use of temporary labour agencies whose staff are compensated at National Living Wage level causes potential negative impacts, particularly for workers who are employed on zero hours contracts. This may directly affect their earning capacity unless managed closely and has a potential knock-on effect on the vitality of the communities they live in. b. ii. and c. While Greencore sets the rate of pay for temporary colleagues and is therefore directly responsible for the rate, the agency management team manage the working hours of their staff. Greencore is indirectly responsible for this as the requirement for flexible working means a minimum working week is not guaranteed. Greencore can influence this to a certain extent; however third party suppliers are responsible for the management of their own staff and the hours available for them to work. A high rate of employee turnover can indicate dissatisfaction amongst employees. High turnover rates also affect human capital value, stability, business performance and the loss of knowledge and discretionary effort. All stakeholder relationships can be adversely affected by high turnover. Greencore is a business which prides itself on key stakeholder partnerships and relationships which have been formed and progressed over a significant period. Stability is key to these relationships moving forward in a positive way. Greencore is directly responsible for delivering a positive employer brand and employee experience. Colleagues are encouraged to consider their career aspirations and Greencore are committed to facilitating the achievement of these and thereby offering a long and sustainable career choice for employees which should, in return reduce or lower employee turnover. During 2021 Greencore transferred over 1,300 agency workers to become Greencore colleagues. This initiative was completely successful in that it allowed the business to drive flexibility and stability into an area of the workforce where there was much uncertainty. Colleagues who transferred have also enjoyed the opportunity to develop their skill base and their career opportunities. Greencore is committed to offering an employment solution for everyone and during 2022 the team will be working towards offering more flexibility to attract from within the labour market. This approach should identify new areas of labour supply opportunity.	
	103-2 The management approach and its components	For GRI 401: Employment 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	a. We developed a Group People Plan to support our business strategy of growth, relevance and differentiation. Responsibility for the deployment of this plan sits with our Chief People Officer. Heads of HR for each Business Unit work in conjunction with the site team and the site HRBP's to ensure this is managed. b. From an external and organisational perspective, we have been identifying opportunities to improve our engagement with our permanent and agency-based workforce. Stakeholders and business customers increasingly expect suppliers to take a more integrated, partnership approach as standard. Global mobility is being impacted by Brexit and a rise in agile working is impacting local mobility. Labour Sustainability remains the key strategic pillar. Going into 2022 there will be more emphasis on offering an employee value proposition that is competitive, in line or above market rate and which satisfies a good work / life balance split. There will be more emphasis on ensuring a pipeline of talent is available and sustained in all areas across the business and that colleagues have clear career opportunities that are realised in house. c. Both the Group People Plan and Labour Sustainability Plan are deeply integrated into our day-to-day operations across all business units, with a long-term view for change and continuous improvement at the core. These are supported by a policy structure focused on the development of Greencore colleagues. The Greencore HR Director - Reward and Shared Services is responsible for this policy. After identifying the number of colleagues / temporary staff who are compensated in line with the National Living Wage, Greencore implemented a workstream to address this issue and move towards being an employer paying staff at real living wage levels. This has led to the introduction of a pay pyramid and new contract, onto which we have transferred over 1,300 agency colleagues, guaranteeing them a minimum working week and opportunity to progress their career. The Labour Sustainability Project will continue to review and address how we manage employment within Greencore. The project spans recruitment to retirement with the fundamental objective of delivering a sustainable labour force to support business growth. A reward and remuneration strategy is in place for all salaried positions and a generic contract of employment for all weekly paid colleagues across the group is in place. Pay scales for weekly colleagues are determined by local negotiations and sit in line with market rates. Agency colleagues are entitled to, and receive, the same pay and benefits as those of permanent Greencore colleagues. Going forward the business is assessing the possibility of including agency colleagues in future engagement surveys. Flexibility is managed proactively, and with a view to delivering sufficient working hours to agency colleagues. A robust recruitment process is in place and potential new hires are benchmarked against a behavioural set which underpins the culture within Greencore. We are building on this by undergoing a transformation of recruitment methods to build a framework for selection with an objective of reducing the turnover within salaried and weekly paid populations. Performance management and talent development is managed proactively and career planning and development is a key part of the Greencore experience. vi. There is a target to reduce the number of external hires and promote internally where possible — internal hires are increasing year on year. To develop our employees and manage our turnover, we undertake regular reviews, probationary periods and regular check-ins through our Grow with Greencore programme. We use competency frameworks to manage our direct employees, which includes role requirements and expected levels of behaviour. Turnover is also a site KPI and reviewed on a weekly and monthly basis. To effectively manage our agency workers, labour planning meetings and forecasting are used to determine staff numbers and manage agency workers. vi. We use an anonymous external helpline as well as internal grievance procedures to remedy negative impacts when they occur. These apply to both staff and the communities we operate in. In order to monitor the effectiveness of these grievance mechanisms we gather employee feedback, predominantly in forums, surveys and through Union stewards. When a grievance is raised, we open a case which is managed by a Greencore team member who is not directly associated with the issue. Along with an independent third party, we individually assess each grievance.	

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GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-3 Evaluation of the management approach	For GRI 401: Employment 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: 　i. The mechanisms for evaluating the effectiveness of the management approach; 　ii. The results of the evaluation of the management approach; 　iii. Any related adjustments to the management approach.	a. i. We use an employee engagement process to provide a two-way feedback mechanism. Our last evaluation showed positive engagement scores within the survey, with a focus area of career development and career opportunities. This led to the development of our management system and talent calibration, as well as twice yearly succession planning.	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	The reporting organisation shall report the following information: a. Total number and rate of new employee hires during the reporting period, by age group, gender and region. b. Total number and rate of employee turnover during the reporting period, by age group, gender and region.	a. Number of new hires: 4,553. Report does not capture age group, gender or region. b. Turnover: 32.44%. Report does not capture age group, gender or region.	
Occupational health and safety				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 403: Occupational Health and Safety 2018, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: 　i. Where the impacts occur; 　ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. 　c. Any specific limitation regarding the topic Boundary.	a. The health, safety and wellbeing of our colleagues, or any person who may visit any of our sites, is of paramount importance. Our success depends on the culture we create and trust they place in us to provide a safe and healthy working environment. Part of this means having clear standards and an ethos that creates a culture that encourages our colleagues to make informed choices about their physical and emotional wellbeing. b. and b. ii. We continually strive to improve the safety of our manufacturing processes, working environments and logistical operations for our colleagues, ensuring they remain alert to any potential health impact that may arise from hazards. We are increasing our focus on human-centric external risk factors such as social demographics and lifestyle choices as these can also impact on colleagues' health and wellbeing, and the ability or capacity of our colleagues to fulfil their role. 　i. There are a range of internal and external influences that could potentially impact on colleagues' health and safety. These include raw material sourcing; customer and food standard compliance requirements; processing equipment; changes in product requirements, production volumes and processes; and the competence of staff, contractors and suppliers. c. None.	

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GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-2 The management approach and its components	For GRI 403: Occupational Health and Safety 2018, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	a. and c. iv. Our Chief Operating Officer and our Director of Health, Safety and Environment are responsible for the overall delivery of our health and safety strategy. Performance against the strategy is reviewed and monitored by our leadership team and is also subject to regular review and external auditing across our business units. Governance structure – Executive and senior health and safety risk review and management. c. vii. Greencore's ability to deliver products to meet customer and quality requirements, whilst operating safely, are constantly monitored and reviewed using a principle of three lines of defence. This principle incorporates a range of activities: management meetings, internal and external audits, customer feedback, site and business unit reviews, monitoring new and changed legislation, regulatory intervention and safety management system reviews. The impact of the COVID-19 crisis continues to bring health and safety issues into sharp focus, both for our business and the wider community. We have taken extensive actions across a number of fronts to protect lives and livelihoods while supporting local and national efforts to tackle the pandemic and we will continue with these efforts. This year we developed the foundations for a new health and safety strategy, built around five pillars. Each pillar comes with clear priorities for action and measures of success. The pillars are as follows: • Standards – creating a common way of working to achieve sustainable results • People – providing a framework to keep people safe and healthy • Leadership – driving accountability, ownership, and responsibility at the right levels • Culture – creating trust and openness to foster a resilient and sustainable approach • Governance – establishing an effective validation process to enable continual improvement. Due to COVID-19, Greencore has experienced a period of unprecedented change. This has impacted our workplace Reportable Accident Frequency Rate ("RAFR"), which has increased from 0.34 in FY20 to 0.37 in FY21. Our health and safety strategy consists of a set of robust processes, procedures, and audits, together with ongoing colleague engagement, supervision and training across all our sites. Within this, we have implemented a system to ensure we comply with legal occupational health and safety requirements, and consistently apply and communicate risk management standards and guidelines across all areas of the business. We have a new set of Group-wide health and safety standards, supported by action plans and priorities. These are incorporated into our key performance objectives. The additional investment we are making in technology and software will enable us to further improve our safety processes, communication, reporting and governance. In addition to the improved health and safety systems, we have further improved occupational health systems in place for all our manufacturing sites and have continued to increase investment in health and wellbeing. These improvements are supported by our new 'Hearts and Minds' programme, which will help to deepen our understanding of safety culture at each of our sites. Greencore continues to play a greater role in shaping the future health and safety agenda for our sector and we have increased our engagement and collaboration efforts with influential organisations, trade associations, government agencies and chartered institutions including industry working groups, the Chilled Food Association, Best In Practice Safety Forum, Institution of Occupational Safety and Health, Acre Frameworks and the Safety4Good charity. c. vi. We ensure concerns from stakeholders in relation to health and safety can be raised in a number of ways. Incidents can be raised, confidentially and, if required, anonymously, through the independent helpline promoted throughout Greencore's operations. We have ongoing communication with external regulators and interested parties, and also hold joint consultative meetings with recognised trade unions and non-trade union members alike. We support and encourage the appointment of safety / worker representatives from the workforce, who are given appropriate training and resources to carry out their duties. We attend and host health and safety meetings thereby engaging in consultative, investigatory processes to ensure that all health and safety concerns are brought to a satisfactory conclusion. All significant health and safety performance-related concerns are addressed through site management teams with the support of the Director of SHE and the SHE leadership team. Incidents brought to the attention of Greencore are appropriately investigated and any material matters are reported to the Board.	
	103-3 Evaluation of the management approach	For GRI 403: Occupational Health and Safety 2018, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	a. Performance against the strategy is reviewed and monitored by our leadership team and is also subject to regular review and external auditing across our business units. i., ii. and iii. included in GRI 403 103-1 above.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	The reporting organisation shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organisation: a. A statement of whether an occupational health and safety management system has been implemented, including whether: i. The system has been implemented because of legal requirements and, if so, a list of the requirements; ii. The system has been implemented based on recognised risk management and/or management system standards/guidelines and, if so, a list of the standards/guidelines. b. A description of the scope of workers, activities, and workplaces covered by the occupational health and safety management system, and an explanation of whether and, if so, why any workers, activities, or workplaces are not covered.	a. i. and ii. Greencore maintains an Integrated Management System (IMS) which covers Safety, Health and Environmental (SHE) management. Our SHE manual describes how the activities of Greencore are built on the Plan-Do-Check-Act model as set out in the 'Successful Safety Management' outlined in HSE Publication HS(G) 65 and is aligned to the requirements of ISO 14001 and ISO 45001. Our health and safety strategy consists of a set of robust processes, procedures, and audits together with ongoing colleague supervision and training across all our sites. Within this, we have implemented a system to ensure we comply with legal occupational health and safety requirements, and consistently apply and communicate risk management standards and guidelines across all areas of the business. ii. We have also developed a new set of Group-wide health and safety standards, supported by action plans and priorities, and incorporated those into our key performance objectives. The additional investment we are making in technology and software will enable us to further improve our safety processes, communication, reporting and governance. b. We are developing our health and safety strategy further to ensure that we can adequately resource our ambitions around vision, culture and leadership.	"
	403-2 Hazard identification, risk assessment, and incident investigation	The reporting organisation shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organisation: a. A description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimize risks, including: i. How the organisation ensures the quality of these processes, including the competency of persons who carry them out; ii. How the results of these processes are used to evaluate and continually improve the occupational health and safety management system. b. A description of the processes for workers to report work-related hazards and hazardous situations, and an explanation of how workers are protected against reprisals. c. A description of the policies and processes for workers to remove themselves from work situations that they believe could cause injury or ill health, and an explanation of how workers are protected against reprisals. d. A description of the processes used to investigate work-related incidents, including the processes to identify hazards and assess risks relating to the incidents, to determine corrective actions using the hierarchy of controls, and to determine improvements needed in the occupational health and safety management system.	a. and a. i. Hazard Identification is an established process within Greencore, with identified controls for managing risks. This process is continually reviewed and improved through: • Focused priorities: work equipment safety, manual handling activity assessments and workplace transport risks have been a focus for 2020, resulting in improved conditions and risk controls; • Risk assessment inventory management: identification and consultation with colleagues and line management on risk associated to their work activities. ii. This provides a culture of engagement and ownership of the controls locally: • Hazard awareness and near miss reporting: engaging colleagues is key to ensuring the hazards are addressed and managed collaboratively. b. Greencore leadership encourage all employees to raise health and safety concerns and facilitate near miss and hazard reporting processes through: • Visitor inductions and site procedures; • Contractor inductions; • Employee inductions; • Health and safety training; • Performance tracking and trending of concerns raised and closed; • Behavioural safety observations; • Leadership tours. c. and d. Greencore is investing in a software solution to make it even easier for all colleagues to report hazards and incidents from any mobile phone, handheld device or PC which will provide greater insights and track investigations and actions to closure.	
	403-3 Occupational health services	The reporting organisation shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organisation: a. A description of the occupational health services' functions that contribute to the identification and elimination of hazards and minimization of risks, and an explanation of how the organisation ensures the quality of these services and facilitates workers' access to them.	a. We have an internal occupational health team and management systems based around the pillars defined within our Health and Wellbeing Strategy. The occupational health policy programme for Greencore is determined by a combination of legal requirements and health risks, identified through working practice and process reviews of employees engaged in work for Greencore. The key elements of the workplace occupational health programmes are: • Occupational health needs assessment of all Greencore controlled workplaces; • A health hazard audit and health matrix development; • Health surveillance identification subject to risk; • Workplace medical standards and consideration to adjustments or limitations, with regards to individual health conditions, vulnerable, young or new and expectant mothers; • Case management reviews of the workforce: trend analysis and socio economic factors of the workforce. Mental health, capability from ill health and stress management is integral to the occupational health programmes and undertaken through case management reviews and individual risk assessments. While the working environment contributes to colleagues' state of health, Greencore takes responsibility in its supportive role and provides information, communications and a supportive counselling role where possible to empower colleagues to achieve their personal responsibility to maintain good physical and mental health, and to enable them to sustain a good work-life balance. Regular scheduled reviews of performance of the occupational health strategy policy and programmes is integral to Greencore Governance.	

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GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 403: Occupational Health and Safety 2018	403-4 Worker participation, consultation, and communication on occupational health and safety	The reporting organisation shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organisation: a. A description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system, and for providing access to and communicating relevant information on occupational health and safety to workers. b. Where formal joint management-worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees.	a. and b. All Greencore sites have health and safety committee meetings, with representatives from management and shop floor that actively review health and safety performance and hazards concerns raised locally. Employees are encouraged to 'get involved' and assist in improvements to the system through participating in new projects, routine inspections, behavioural observations or through further training to become fire marshalls, first aiders or area safety representatives. Engagement walks are conducted on a regular basis by leaders within our business, they provide a structured but informal way to engage with our colleagues in their work environment.	
	403-5 Worker training on occupational health and safety	The reporting organisation shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organisation: a. A description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations.	We continue to invest in colleagues to ensure they continue to grow and remain safety conscious. Our colleagues undertake training and development that covers compliance, operational and developmental competencies. All of our colleagues, including agency staff, are trained to Level 2 Occupational Health and Safety standard as a minimum requirement. Additionally, all colleagues, agency and contractors undertake site and departmental induction training which includes local health and safety procedures. Greencore workplaces identify local training needs for staff. All training is managed and documented within a site training matrix. Operational, compliance and competence development needs are identified and delivered in partnership with HR and L&D. Our SHE Technician apprenticeship comprising of a cohort of colleagues and representatives who want to develop practical and technical safety skills has been very successful and is delivering new members of the SHE team to the business with enthusiasm and career prospects.	
	403-6 Promotion of worker health	The reporting organisation shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organisation: a. An explanation of how the organisation facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided. b. A description of any voluntary health promotion services and programmes offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organisation facilitates workers' access to these services and programmes.	a. Work activity, external risk factors (including social demographics) and life choices may impact on a colleague's health and wellbeing and capability to work in their substantive role. Work exacerbated or related mental ill health can cause loss of productivity, ill health and sickness absence and therefore impact performance and output. Using the framework and pillars of our health and wellbeing strategy and a mixture of internal and external teams we have a number of resources and materials to educate, engage and inform. b. We use health and wellbeing material, our People at the Core survey and more general feedback to identify any actual or potential impacts. We also use case management data to record work related mental health or capability from ill health, as well as a stress standard and individual risk assessment. While the working environment contributes to colleagues' state and Greencore takes responsibility in its supportive role, it is also a colleague's responsibility to maintain good physical and mental health to enable them to sustain a good work-life balance. We distribute briefings on a monthly basis/factsheets and conduct webinars regularly. Wellbeing champions have been established in many areas and are regularly holding engagement meetings, running events and working with colleagues on-site to promote and educate.	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	The reporting organisation shall report the following information: a. A description of the organisation's approach to preventing or mitigating significant negative occupational health and safety impacts that are directly linked to its operations, products or services by its business relationships, and the related hazards and risks.	New business and change management has a defined process to ensure major hazards are not accepted by the business and the risks being introduced are minimised and controlled at source. This is achieved through collaborative management processes that ensure: • Project management processes support new product development, new customer requirements, equipment and machinery change and installation and construction works are supported by nominated health and safety resource and competency; • Safety performance and standards are integral to the approval of supplier's process; • Where appropriate safety standards are specified in the tender, contractual and purchase agreements; • Capital expenditure authorisation process includes a health and safety review and approval from the Greencore health and safety leadership team.	

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GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location

GRI 403: Occupational Health and Safety 2018	403 - 9 Work-related injuries	The reporting organisation shall report the following information:
		
		a. For all employees:
		  i. The number and rate of fatalities as a result of work-related injury;
		  ii. The number and rate of high-consequence work-related injuries (excluding fatalities);
		  iii. The number and rate of recordable work-related injuries;
		  iv. The main types of work-related injury;
		  v. The number of hours worked.
		b. For all workers who are not employees but whose work and/or workplace is controlled by the organisation:
		  i. The number and rate of fatalities as a result of work-related injury;
		  ii. The number and rate of high-consequence work-related injuries (excluding fatalities);
		  iii. The number and rate of recordable work-related injuries;
		  iv. The main types of work-related injury;
		  v. The number of hours worked.
		c. The work-related hazards that pose a risk of high-consequence injury, including:
		  i. How these hazards have been determined;
		  ii. Which of these hazards have caused or contributed to high-consequence injuries during the reporting period;
		  iii. Actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls.
		d. Any actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls.
		e. Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked.
		f. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.
		g. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.
			a. FY21
			Greencore uses the following metrics to track employee health and safety:
			All accidents AIR (Accident Incident Rate) - accidents per 100 employee - All accidents including minor = 0.59
			RIDDOR AFR (Accident Frequency Rate) RIDDOR Accidents per 100,000hrs RIDDOR ONLY = 0.37
			b. Included in above.
			c. i. Hazard identification is an established process within Greencore, with identified controls for managing risks. This process is continually reviewed and improved through:
			  ii. Focused priorities: work equipment safety, manual handling activity assessments and workplace transport risks have been a focus for 2021, resulting in improved conditions and risk controls.
			  iii. Risk assessment inventory management: identification and consultation with colleagues and line management on risk associated to their work activities. This provides a culture of engagement and ownership of the controls locally.
			  Hazard awareness and near miss reporting: engaging colleagues is key to ensuring the hazards are addressed and managed collaboratively.
			d. We continually strive to improve the safety of our manufacturing processes, working environments and logistical operations for our colleagues, ensuring they remain alert to any potential health impact that may arise from hazards. We are increasing our focus on human-centric external risk factors such as social demographics and lifestyle choices as these can also impact on colleagues' health and wellbeing, and the ability or capacity of our colleagues to fulfil their role.
			e. All accidents AIR (Accident Incident Rate) - accidents per 100 employees RIDDOR AFR (Accident Frequency Rate) - RIDDOR accidents per 100,000 hours.
			f. No exclusions.	

Diversity and equal opportunity				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 405: Diversity and Equal Opportunity 2016, the reporting organisation shall report the following information:
		a. An explanation of why the topic is material.
		b. The Boundary for the material topic, which includes a description of:
		  i. Where the impacts occur;
		  ii. The organisation's involvement with the impacts. For example, whether theorganisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		c. Any specific limitation regarding the topic Boundary.
			a. Putting people at the core is at the centre of the Greencore Way. We believe that we ultimately differentiate ourselves through our people and therefore we strive to create a culture where our people can be themselves at work and fulfil their potential. We believe that inclusion and diversity enable better business outcomes.
			b. We believe that inclusion and diversity are not only inter-changeable but inter-dependent and by capitalising on these we create a culture where diversity of thought, connectedness and innovative solutions combine to make us a better business.
			c. None.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-2 The management approach and its components	For GRI 405: Diversity and Equal Opportunity 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: 　i. Policies; 　ii. Commitments; 　iii. Goals and targets; 　iv. Responsibilities; 　v. Resources; 　vi. Grievance mechanisms; 　vii. Specific actions, such as processes, projects, programmes and initiatives.	a. At a Group level our Chief People Officer is accountable for progressing these topics and has appointed a Head of Inclusion & Diversity who is responsible for setting the direction of our strategy and delivering progress against it. We have a senior Steering Group comprising Executive Members who support delivery of the strategy and underpin this with leadership and HR teams for each Business Unit who work together to enable progress at each location. Colleague Catalyst groups are also established to ensure colleagues are represented and to encourage local engagement in inclusion activity. b. Our inclusion and diversity approach embeds our purpose across the business and helps our colleagues belong and thrive just by being themselves. It's our commitment to making every day better for our colleagues. c. i. Inclusion and Diversity is integrated into our ways of working and policies, we also have a dedicated policy on Inclusion & Diversity. We are committed to a non-discriminatory workplace and operate a zero-tolerance approach to any form of discrimination. We do not accept any behaviour or attitudes that discriminate against anyone. Our commitment goes beyond industry standards and policies. We are fully committed to ensuring all our colleagues are treated fairly and receive equal pay for carrying out equivalent roles. c. ii. and iii. We have set out four aspirations which we work to achieve: • A workforce at least as diverse as the communities in which we operate, the customers we serve, and the consumers who buy our products, at every hierarchy level • A culture where our people can be themselves at work • An organisation that creates opportunities for our people to fulfil their potential at work • A business that has inclusion and diversity hardwired into everything we do, where every colleague understands how important it is to us and where we demonstrate that every day. We have also identified the areas of greatest focus and have plans in place to make positive change in these areas. We are an equal opportunity employer and aim to ensure that all colleagues and potential colleagues are treated equally both during recruitment and through employment, regardless of their unique characteristics. When recruiting for our colleagues, we welcome and encourage the unique contributions different people can bring and ensure that our adverts state our intentions. We recruit, make selection and promotion decisions based solely on performance and capability. We strive to help all colleagues to grow a rewarding career at Greencore and our development opportunities are designed for all. We commit to help all colleagues to build a development plan that supports them to realise their career goals. c. vi. We ensure that colleagues joining Greencore understand how to raise grievances and encourage colleagues to talk directly to their line manager so problems can be effectively resolved. We also extend our Harnessing Difference education beyond our managers and learning programmes encouraging all colleagues to learn more about embracing difference in their daily interactions to help eradicate discrimination. We look to continually re-enforce this through employment codes and standards with 81% of colleagues telling us they feel safe to speak up if they see discrimination. All allegations of discrimination are investigated immediately and dealt with in line with our grievance process. We recognise that in certain circumstances, a colleague may not feel comfortable raising this matter directly with their line manager or local HR representative. To overcome this potentially difficult circumstance and to protect colleagues' anonymity, we have employed the use of NAVEX Global. NAVEX Global is an anonymous, free to contact and confidential service to enable colleagues to report any concern, this could include concerns in relation to inclusion and/or diversity discrimination. c. vii. We acknowledge inclusion, diversity and equal opportunity is an evolving issue, so our approach focuses on making Greencore a place for everyone, mitigating negative impacts when they do occur, as well as looking to go beyond, creating positive impacts for underrepresented groups. Core to our approach is colleague engagement and involvement. In the last 12 months we have engaged with 1,200 colleagues to understand the cultural environment and footprint of Greencore and shape our I&D strategy for the next five years. In the delivery of this strategy we have continued to invest in educating and training our front-line managers on harnessing difference, implemented a training programme for managers who recruit and engaged our leaders in colleague listening groups to help our leaders put inclusion at the heart of their day to day work. We have delivered an annual calendar of inclusion events, suggested by colleagues designed to celebrate, recognise, and embrace the different cultural and historic events that are important to our people. As a result, 82% of colleagues feel they can be themselves at Greencore and we have seen another increase in belonging, with a 6% uplift since last year. We have also extended our reach externally, and are part of an industry wide Reverse Mentoring Initiative across the Food and Drink sector, with members of our executive team and colleagues taking part, have supported with levy investment to help drive diversity in our local communities, and have worked with suppliers to influence inclusion and diversity across the sector. We will continue to review our recruitment, reward, engagement, retention, and training and development activities to ensure they all support us in our commitment to inclusion, diversity, equality of opportunity and to narrowing the pay gap.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-3 Evaluation of the management approach	For GRI 405: Diversity and Equal Opportunity 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	At a Group level our Chief People Officer is accountable for progressing these topics and has appointed a Head of Inclusion & Diversity who is responsible for setting the direction of our strategy and delivering progress against it. We have a senior Steering Group comprising Executive Members who support delivery of the strategy and underpin this with leadership and HR teams for each Business Unit who work together to enable progress at each location. In order to monitor the effectiveness of these grievance mechanisms we gather employee feedback, predominantly in forums, surveys and through Union stewards. When a grievance is raised, we open a case that is managed by a Greencore team member who is not directly associated with the issue and we individually assess each grievance.	
GRI 405: Diversity and Equal opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men	The reporting organisation shall report the following information: a. Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation. b. The definition used for 'significant locations of operation'.	a. Male to Female ratio - salaried = 1.13:1 Male to Female ratio - weekly 1.05:1 FY19-20. Data for this period can be found in our publicly available Gender Pay Gap reports. b. By significant location we refer to all manufacturing sites distribution depots and office locations.	
Non-discrimination				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 406: Non-Discrimination 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. Where the impacts occur; ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	Included in the description of management approach for GRI 405: Diversity and Equal Opportunity.	
	103-2 The management approach and its components	For GRI 406: Non-Discrimination 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	Included in the description of management approach for GRI 405: Diversity and Equal Opportunity.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location

GRI 103: Management Approach 2016	103-3 Evaluation of the management approach	For GRI 406: Non-Discrimination 2016, the reporting organisation shall report the following information:
		
		a. An explanation of how the organisation evaluates the management approach, including:
		
		  i. The mechanisms for evaluating the effectiveness of the management approach;
		
		  ii. The results of the evaluation of the management approach;
		
		  iii. Any related adjustments to the management approach.
			Included in the description of management approach for GRI 405: Diversity and Equal Opportunity.	

GRI 406: Non-Discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	The reporting organisation shall report the following information:
		
		a. Total number of incidents of discrimination during the reporting period.
		
		b. Status of the incidents and actions taken with reference to the following:
		
		  i. Incident reviewed by the organisation;
		
		  ii. Remediation plans being implemented;
		
		  iii. Remediation plans that have been implemented, with results reviewed through routine internal management review processes;
		
		  iv. Incident no longer subject to action.
			a. FY21 = 3.
			
			b. One case withdrawn, one case concluded satisfactorily and one case still outstanding however, remedial action has been implemented.
			
			  i. Remedial action plans in place in all three cases.
			
			  ii. Two of the incidents have been concluded satisfactorily, one case still ongoing.
			
			  iii. All cases have been reviewed through internal management review processes.
			
			  iv. One incident still outstanding and subject to action and closure.	

Child labour				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 408: Child Labour 2016, the reporting organisation shall report the following information:
		
		a. An explanation of why the topic is material.
		
		b. The Boundary for the material topic, which includes a description of:
		
		  i. Where the impacts occur;
		
		  ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		
		c. Any specific limitation regarding the topic Boundary.
			a. Whilst human rights abuse has no place in any business, this is an area of growing concern — not just in our global supply chains, but within UK food manufacturing operations. We are deeply committed to respecting and safeguarding the people who work for us, with us, or who are affected by our activities.
			
			b. i. and ii. We view human rights issues - specifically child and forced and compulsory labour and the assessment of our supply chain in relation to these topics — of material relevance to Greencore's business. We have specifically identified child and forced labour as a key component of our Human Rights approach within our sustainability strategy, which is informed by stakeholder input.
			
			c. Our Human Rights Policy will require all our operations to be subject to human rights reviews or impact assessments every two years. During the Covid-19 pandemic restrictions at sites have caused some delays to surveillance audits. Good progress has been made on the recovery from this and we expect to be back within our target by the next reporting period.
			
			We are solely responsible for Greencore site actions. We have an influence on our suppliers through our procurement processes, however we do not have exclusive influence.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location

GRI 103: Management Approach 2016	103-2 The management approach and its components	For GRI 408: Child Labour 2016, the reporting organisation shall report the following information:
		
		a. An explanation of how the organisation manages the topic.
		
		b. A statement of the purpose of the management approach.
		
		c. A description of the following, if the management approach includes that component:
		
		  i. Policies;
		
		  ii. Commitments;
		
		  iii. Goals and targets;
		
		  iv. Responsibilities;
		
		  v. Resources;
		
		  vi. Grievance mechanisms;
		
		  vii. Specific actions, such as processes, projects, programmes and initiatives.
			a. and b. We take a zero-tolerance approach towards child, forced and compulsory labour and work closely with suppliers to manage these risks.
			
			c. i. Our Human Rights Policy will require all our operations to be subject to human rights reviews or impact assessments every two years. During the Covid-19 pandemic restrictions at sites have caused some delays to surveillance audits. Good progress has been made on the recovery from this and we expect to be back within our target by the next reporting period. None of our operations are considered to carry significant risk for incidents of child labour, young workers exposed to hazardous work, or forced labour.
			
			Child, forced and compulsory labour remains a serious concern in many of the countries where our ingredients originate. Such cases are often hidden due to the complexity of global supply chains. While we have not been made aware of specific cases to address, this does not mean that the problem does not exist.
			
			c. ii. We are committed to a programme of implementing the principles of the Ethical Trading Initiative Base Code, which we align to. This drives a programme of site audits, inspections, actions and additional external support as needed and further aligns with UN Declaration of Human Rights, UN Guiding Principles on Business and Human Rights and UK Modern Slavery Act. We also note the requirement for transparency in supply chains embedded within the UK Modern Slavery Act, and are committed to a policy of ETI base code compliance within our value chains. The work references the UN and ILO appropriate standards for human rights as well as the ETI Base Code.
			
			These processes identify and prevent cases of any person under the age of 18 years old from working for Greencore directly or through our agency labour partners, and also identify potential cases of forced labour. We conduct enhanced checks and ethical audits to verify these processes.
			
			c. vii. We will risk assess our global supply chains and sourcing operations, and work with our suppliers to tackle identified risks.
			
			We are solely responsible for Greencore site actions. We have an influence on our suppliers through our procurement processes, however we do not have exclusive influence.
			
			c. vi. The issue is overseen by our Ethical Committee. Responsibility for these topics sits with our Head of Human Rights. Team leadership runs from the Group Head of Sustainability to the Head of Human Rights and the Human Rights Manager and Sustainable Sourcing Advisor. We also work with experienced specialist colleagues in HR, Technical and Purchasing.
			
			c. v. We have resourced a Human Rights team to facilitate progress in this area and have invested in training for our key staff across our internal sites, technical team and procurement team to ensure human rights issues are integrated into their decision-making.
			
			c. vii. We run two key ongoing programmes to manage these issues: our Site Ethical Compliance Programme and Value Chain Human Rights Risk Assessment and Engagement to manage these issues. These incorporate clear processes to identify Human Rights challenges, as defined within the ETI Base Code, within Greencore or our supply chains.
			
			c. vi. We have grievance mechanisms in place for all these topics, which we also use to monitor our effectiveness of managing these issues. Our primary mechanism is a confidential helpline provided by NAVEX Global. We also utilize the industry level mechanism of SMETA as well as government bodies such as the GLAA and Police. NAVEX Global and SMETA cover all Greencore production sites, and are available to all colleagues and workers. While Greencore manages the systems, it shares all learnings with stakeholders. In the highly sensitive area of human rights, each case may be handled differently; we use specialist internal and external resource and prioritise support to individuals impacted.
			
			In order to ensure effectiveness of the grievance mechanism, we analyse each of the issues raised. They are also raised and reviewed during third party SMETA audits and stakeholder meetings.
			
			We have large global supply chains which means data is challenging to gain full transparency on. We break down risk by country and activity within our value chain, so we can compare the child labour risks and decide where to focus our resources. In FY21 97% of our direct ingredient and packaging suppliers were connected to us via Sedex, compared to 98% in FY20 and 95% in FY19.	

	103-3 Evaluation of the management approach	For GRI 408: Child Labour 2016, the reporting organisation shall report the following information:
		
		a. An explanation of how the organisation evaluates the management approach, including:
		
		  i. The mechanisms for evaluating the effectiveness of the management approach;
		
		  ii. The results of the evaluation of the management approach;
		
		  iii. Any related adjustments to the management approach.
			a. i. We evaluate our management of human rights issues and specifically child, forced and compulsory labour, by undertaking internal and external audits. We have independent third-party ethical audits, as well as having an SA8000 trained ethical auditor within the sustainability team who can work internally and externally to verify compliance. This is a rolling plan of audit and compliance monitoring that continues to show timely responses and closure of issues. We have developed a programme of Ethical Support Visits for each Greencore site to provide additional support to site teams beyond audit. No critical issues have been reported.
			
			ii. Within our own operations, none are considered to have significant risk for incidents of child labour, young workers exposed to hazardous work and forced labour. Agricultural food supply chains source from geographical areas where child and forced labour is endemic; it may be present but not directly reported, therefore we report zero, but caveat this with the understanding that transparency of this issue in global supply chains remains complex. We know that child labour remains a serious concern in many of the countries from which our food originates — however, we have not been made aware of specific cases to address; this does not mean that the problem does not exist.
			
			We use a detailed risk assessment model to analyse the human rights risks of the food that we buy from our suppliers. This includes a range of human rights indicators by country and raw material category and provides a detailed numerical model to inform our approach. These risk assessments include industry-leading forced labour analysis (FNET and Sedex) to identify areas of greatest risk. This data is used within our supplier engagement work to allow prioritisation within our value chains and ensure our resources are focused on the areas of greatest social risk.
			
			The internal team insight drives data and analysis into Ethical and Sustainable Sourcing Committees. We look to use the best available technology which in this case is the Sedex system, the Food Network for Ethical Trade Risk Assessment Tool and third party SMETA audits for compliance and insight.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location

GRI 408: Child Labour 2016	408-1 Operations and suppliers at significant risk for incidents of child labour	The reporting organisation shall report the following information:
		a. Operations and suppliers considered to have significant risk for incidents of:
		  i. Child labour;
		  ii. Young workers exposed to hazardous work.
		b. Operations and suppliers considered to have significant risk for incidents of child labour either in terms of:
		  i. Type of operation (such as manufacturing plant) and supplier;
		  ii. Countries or geographic areas with operations and suppliers considered at risk.
		c. Measures taken by the organisation in the reporting period intended to contribute to the effective abolition of child labour.
			a. Agricultural food supply chains from geographical areas where child labour is endemic — it may be present but not directly reported, therefore we report zero but caveat this with the understanding that transparency of this issue in global supply chains remains complex. We have not been made directly aware of any incidents.
			b. Significant risk is within our value chain:
			  i. Primary agricultural operations or basic processing of food;
			  ii. Africa, Asia, South America — Europe and Americas to a lesser extent.
			c. FY21
			Third party independent ethical audits of Greencore sites. Use of the online ethical platform Sedex for visibility of supplier child labour data, employment of dedicated Human Rights specialist team and a range of collaborative industry actions.
			FY18-FY20
			Third party independent ethical audits of Greencore sites. Use of the online ethical platform Sedex for visibility of supplier child labour data, collaborative industry actions.	

Forced or compulsory labour				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 409: Forced or Compulsory Labour 2016, the reporting organisation shall report the following information:
		a. An explanation of why the topic is material.
		b. The Boundary for the material topic, which includes a description of:
		  i. Where the impacts occur;
		  ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		c. Any specific limitation regarding the topic Boundary.
			Included in the description of GRI 408: Child Labour.	

	103-2 The management approach and its components	For GRI 409: Forced or Compulsory Labour 2016, the reporting organisation shall report the following information:
		a. An explanation of how the organisation manages the topic.
		b. A statement of the purpose of the management approach.
		c. A description of the following, if the management approach includes that component:
		  i. Policies;
		  ii. Commitments;
		  iii. Goals and targets;
		  iv. Responsibilities;
		  v. Resources;
		  vi. Grievance mechanisms;
		  vii. Specific actions, such as processes, projects, programmes and initiatives.
			Included in the description of GRI 408: Child Labour.	

	103-3 Evaluation of the management approach	For GRI 409: Forced or Compulsory Labour 2016, the reporting organisation shall report the following information:
		a. An explanation of how the organisation evaluates the management approach, including:
		  i. The mechanisms for evaluating the effectiveness of the management approach;
		  ii. The results of the evaluation of the management approach;
		  iii. Any related adjustments to the management approach.
			Included in the description of GRI 408: Child Labour.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 409: Forced or Compulsory Labour 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	The reporting organisation shall report the following information: a. Operations and suppliers considered to have significant risk for incidents of forced or compulsory labour either in terms of: i. Type of operation (such as manufacturing plant) and supplier; ii. Countries or geographic areas with operations and suppliers considered at risk.b. Measures taken by the organisation in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labour.	Zero cases for Greencore operations. We work with UK enforcement bodies such as the Police and GLAA to understand the risk of exploitation occuring within the wider community as well as within our own operations. Agricultural food supply chains from geographical areas where labour abuse is endemic — it may be present but not directly reported, therefore we report zero but caveat this with the understanding that transparency of this issue in global supply chains remains complex.	
Human rights assessment				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 412: Human Rights Assessment 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. Where the impacts occur; ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	Included in the description of GRI 408: Child Labour.	
	103-2 The management approach and its components	For GRI 412: Human Rights Assessment 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	Included in the description of GRI 408: Child Labour.	
	103-3 Evaluation of the management approach	For GRI 412: Human Rights Assessment 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	Included in the description of GRI 408: Child Labour.	
GRI 412: Human Rights Assessment 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	The reporting organisation shall report the following information: a. Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.	FY21 = 100% FY20 = 100% FY19 = 100%	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
Supplier social assessment				

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 414: Supplier Social Assessment 2016, the reporting organisation shall report the following information:
		
		a. An explanation of why the topic is material.
		
		b. The Boundary for the material topic, which includes a description of:
		
		   i. Where the impacts occur;
		
		   ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
		
		c. Any specific limitation regarding the topic Boundary.
			Included in the description of GRI 408: Child Labour.	

	103-2 The management approach and its components	For GRI 414: Supplier Social Assessment 2016, the reporting organisation shall report the following information:
		
		a. An explanation of how the organisation manages the topic.
		
		b. A statement of the purpose of the management approach.
		
		c. A description of the following, if the management approach includes that component:
		
		   i. Policies;
		
		   ii. Commitments;
		
		   iii. Goals and targets;
		
		   iv. Responsibilities;
		
		   v. Resources;
		
		   vi. Grievance mechanisms;
		
		   vii. Specific actions, such as processes, projects, programmes and initiatives.
			Included in the description of GRI 408: Child Labour.	

	103-3 Evaluation of the management approach	For GRI 414: Supplier Social Assessment 2016, the reporting organisation shall report the following information:
		
		a. An explanation of how the organisation evaluates the management approach, including:
		
		   i. The mechanisms for evaluating the effectiveness of the management approach;
		
		   ii. The results of the evaluation of the management approach;
		
		   iii. Any related adjustments to the management approach.
			Included in the description of GRI 408: Child Labour.	

GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	The reporting organisation shall report the following information: a. Percentage of new suppliers that were screened using social criteria.	Our suppliers are screened using a variety of social criteria, and to date 97% of our direct and key indirect suppliers are connected to us on the Sedex collaborative platform for sharing responsible sourcing data on supply chains.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
Customer health and safety				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 416: Customer Health and Safety 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. Where the impacts occur; ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	a. Greencore's technical team mission statement is "To deliver sustainable competitive advantage to Greencore through technical excellence". This mission is driven through three key pillars: Where people want to work, Beyond compliance and Working smarter and through four technical focus areas: People, Innovation, Allergens and Consistency, forming the basis of our technical excellence and our foundation for strong food safety. b. i. Our approach is to ensure we sell and distribute safe food to our customers and consumers. There are three key potential adverse impacts relating to food safety: microbiological food safety incidents, foreign body / physical food safety incidents and chemical food safety incidents. All of these have the potential for negative impacts on the health of the consumer. Microbiological food safety incidents refer to the presence of pathogens in the products that we produce. Foreign body and physical food safety incidents refer to the presence of foreign bodies / physical contamination in the products that we produce. Foreign bodies may be intrinsic to the raw materials used and the products that are produced. Chemical food safety incidents refer to the presence of chemical contamination in the products that we produce. Chemical contamination may occur due to the raw materials used or through the production processes that are used to manufacture the products that are produced. c. None.	
	103-2 The management approach and its components	For GRI 416: Customer Health and Safety 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	a. The governance of our processes is embedded in our 'line of defence approach': 1st line – Structures and management systems, 2nd line – Reporting, review and internal audit, 3rd line – External audit performance. Overall responsibility for Customer Health and Safety sits with the Group Technical Director, Martin Ford. Each Business Unit has a Technical Director (or Head of Technical) who has overall responsibility for that Business Unit. In addition the Technical Directors of the larger business units have supporting Technical teams. Each manufacturing site has a Technical Controller who has overall responsibility for that individual site. b. See GRI 416: 103-1, above. c. i. There are a range of policies in place to manage food safety, as well as best practice documents, as well as customer policies that we align to. We have 24 policy documents in place (including use of genetically modified foods, Control of Allergens), and 22 best practice documents in place (including HACCP development, Internal audits). c. iv. Supplier management is a key element of our control. Centrally, our Head of Technical Services has responsibility for Supplier Management and Performance. We have a central technical function to support this process. Our Audit Team delivers an effective risk assessed supplier approval process for the Greencore supply base, to demonstrate compliance to food safety standards, customer requirements and legislation. Our Central Specification Team deliver detailed raw material specification on a live web based platform. Our Raw Material Technologists deliver site support to manage short term raw material issues within the supply base. Our Subject Matter Experts ("SME") assure food safety and quality from field to fork, supporting and driving technical innovation, supply chain mapping and horizon scanning across the supply chain. We have a 35 strong central technical team to govern and support processes across the business. Testing of raw materials for food integrity and fraud prevention is centrally controlled and completed in conjunction with a well-respected team at 'Food Forensics'. We are active participants in the Food Industry Intelligence Network ("FIIN") where members collate and report all food integrity testing and trace information, the organisation facilitates pooling of over 50,000 test results annually.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-3 Evaluation of the management approach	For GRI 416: Customer Health and Safety 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: i. The mechanisms for evaluating the effectiveness of the management approach; ii. The results of the evaluation of the management approach; iii. Any related adjustments to the management approach.	All Greencore sites have a HACCP (Hazard Analysis Critical Control Point) system in place. This forms the basis of all the food safety controls that are in place on site. The whole site and all of the process steps are considered within the HACCP system including raw materials. Microbiological, physical and chemical hazards will all be considered as part of the HACCP system. Each step in the process is assessed to understand if control at that point is critical to the overall safety of the product. Site HACCP systems are regularly audited and reviewed to ensure that they remain current and any incidents reported will result in a review of the HACCP system. There are specific controls on both raw materials and raw material suppliers. Materials are only purchased from approved sources and all raw materials are purchased against a comprehensive specification. There is a comprehensive testing programme in place which includes raw materials, production environments and the finished products. Technical KPIs are reviewed daily, weekly and monthly at an individual site level. Weekly Technical KPI calls take place which cover all Business Units where results are reported into the senior Technical Team. Our Group Risk Tracker is reviewed by the Group Technical Director and relevant Business Unit technical lead on a monthly basis. All sites undertake internal and external audits. These include certificated third party (BRC) audits by customers, an independent third party Greencore audit and internal audits, which are completed by both Group and internal site auditors. All site current BRC certification status is a minimum of an A* rating. All BRC audit non-conformances must be closed out within 28 days of the audit completion. There are a number of different ways that stakeholders can notify us of concerns around food safety. This may be through telephone helplines / contact addresses which come directly into Greencore, contact through retailers help desks or telephone lines or through regulatory bodies such as Environmental Health or Trading Standards Officers. All serious incidents are investigated, and an incident management team formed of key individuals on site with external support as necessary.	
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	The reporting organisation shall report the following information: a. Percentage of significant product and service categories for which health and safety impacts are assessed for improvement.	Complaint levels — foreign bodies, quality and micro complaints are recorded and assessed for impact. Complaints may be received via the retailer or sent directly to Greencore. Complaints are categorised and investigated by individual sites. Complaint levels are assessed taking into account production volumes and are reported in complaints per million / complaints per hundred thousand packs sold. Microbiological performance will vary dependant on the site and product types but generally will include testing of finished products for both pathogens and indicator organisms, swabbing and analysis of the factory environments for pathogens and indicator organisms. Other microbiological testing may include testing of the quality of water and raw materials used on site. Again, these are managed with both targets of acceptability and improvement at an individual site level. Non conformance levels on complaints and microbiological are extremely low and in line with our customer expectations.	
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	The reporting organisation shall report the following information: a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services within the reporting period, by: i. Incidents of non-compliance with regulations resulting in a fine or penalty; ii. Incidents of non-compliance with regulations resulting in a warning; iii. Incidents of non-compliance with voluntary codes. b. If the organisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.	FY20: three product recalls 1. Salmonella contamination of a salad, this has been linked to the courgette ingredient following engagement with PHE and FSA. Greencore changed country of origin supply. 2. Foreign body contamination of a sandwich resulting in a recall. 3. Foreign body contamination of a ready meal. All instances were recalled voluntarily and corrective actions put in place to prevent a reoccurence.	
Marketing and labelling				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	For GRI 417: Marketing and Labelling 2016, the reporting organisation shall report the following information: a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. Where the impacts occur; ii. The organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	a. We have a responsibility to supply affordable products that cater to a range of consumer preferences and diets while adhering to public health, nutritional and industry food standards guidelines. We believe we can go further by ensuring that our products contribute positively to society. b. i. We want our products to not only taste great, but to be better for people and the planet too. As well as ensuring that our products contribute to a sustainable food system, we will also take steps to make sure they form part of a healthy balanced diet. Eating well on a tight budget can be difficult; there is a strong, well-evidenced correlation between income and dietary ill-health. At the same time, increasing urgency around the climate narrative means we all need to shift towards more planet-friendly diets. We are developing a more personalised approach to nutrition; this means not only supporting changing consumer preferences, but also providing affordable nutrition for all. We want to contribute to a healthier food system by creating nutritious options that are both tasty and convenient. We do this by leveraging our research and development network, nutrition expertise and collaborations. One of the biggest challenges we face is ensuring that there are no trade-offs between health, affordability and sustainability when it comes to feeding the nation. All three elements need to work together and be mutually reinforcing of each other. Defining what this health, affordability, sustainability nexus looks like across all of our product categories, channels and markets is the first step. We then need to make it work by identifying the best opportunities for product innovation, increased efficiency and creative marketing so we can grow demand and scale for good. c. None.	

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Material topics | 400 series (Social topics) *continued*

GRI Standard	Disclosure	Specific disclosure	Greencore direct response	Location
GRI 103: Management Approach 2016	103-2 The management approach and its components	For GRI 417: Marketing and Labeling 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: 　i. Policies; 　ii. Commitments; 　iii. Goals and targets; 　iv. Responsibilities; 　v. Resources; 　vi. Grievance mechanisms; 　vii. Specific actions, such as processes, projects, programmes and initiatives.	a. Within our governance structure, overall responsibility for meeting our Healthy and Sustainable Diets Policy commitments and monitoring overall progress will sit with our Sustainable Diets SBMG. The management group includes the Heads of Food from each of our business units, Technical Subject Matter Experts, Product Developers and Nutritionists. b. Our purpose is "making every day taste better", by making great food for all, that's accessible, healthier and sustainable. This means that nutrition, health and wellness are at the core of our overall strategy. Our approach to product development is influenced by our customers as the majority of our products are produced for retailer/own label; we adapt our products to meet evolving consumer needs. c. Our Product Development teams hold responsibility for developing products to achieve retailer health policies, and for the reporting of range data back into the retailers. Our technical teams support with claim validation. 　i. Our Healthy and Sustainable Diets Policy defines our priorities. We use the WWF Livewell plate to influence our thinking; the Livewell plate is WWF-UK's work on sustainable diets. It demonstrates a diet that is sustainable - looking at carbon, water and land - affordable, and in line with national nutritional guidelines and food preferences in the UK. The six Livewell principles are: eat more plants / eat a variety of foods / waste less food / moderate meat consumption / buy food that meets a credible certified standard / eat fewer foods high in fat, salt and sugar. 　ii. We have a range of commitments related to health and sustainable diets: 　　• Achieving parity on animal protein vs. plant-rich alternatives 　　• Making recipes healthier by reducing nutrients of concerns (calories, salt or saturated fats) 　　• Building in sustainability considerations to NPD so our development teams can understand the impacts of choices made 　　• Recording and reporting on key nutritional parameters so we can ensure we are focussing on driving change, where possible.	
	103-3 Evaluation of the management approach	For GRI 417: Marketing and Labeling 2016, the reporting organisation shall report the following information: a. An explanation of how the organisation evaluates the management approach, including: 　i. The mechanisms for evaluating the effectiveness of the management approach; 　ii. The results of the evaluation of the management approach; 　iii. Any related adjustments to the management approach.	Measuring Healthy Products We use our Nutrition Database — a measure based on the UK Government's nutrient profiling model — to track the healthiness of our products. To help minimise unhealthy ingredients, this model assesses a product's fat, salt and sugar content. And to help promote healthy ingredients, it gauges the fibre, fruit and vegetable content. Progress against specific policy objectives and KPIs is measured via our governance structure; specifically our Health & Sustainable Diets SBMG.	
GRI 417: Marketing and Labeling 2016	417-2 Incidents of non-compliance concerning product and service information and labelling	The reporting organisation shall report the following information: a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning product and service information and labeling, by: 　i. Incidents of non-compliance with regulations resulting in a fine or penalty; 　ii. Incidents of non-compliance with regulations resulting in a warning; 　iii. Incidents of non-compliance with voluntary codes. b. If the organisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.	0.	