



Deforestation Commitment Progress Report

Bakkavor Group plc

Bakkavor commits to 100% deforestation and conversion free sourcing of palm oil, soy, beef and wood pulp by end 2025 with a 2020 cut-off date*.

* The cut-off date is based on the [Accountability Framework Initiative](#) definition. This means that clearance of natural forest after this date renders the affected area or production unit, and the commodity produced there, non-compliant with no-deforestation or no-conversion commitments.

Scope: Bakkavor Foods UK

Deforestation is a key issue for the whole food industry and a substantial contributor to climate change. This report describes the actions undertaken by Bakkavor during 2024 to address commodity related deforestation and outlines our plans for 2025.

Global food systems face pressures from multiple, often interconnected sources. The resilience of our supply chain is fundamental to our operations and environmental sustainability is at the heart of this. With our supplier partners we work to understand and mitigate environmental impacts, with a particular focus on deforestation and land conversion

PALM OIL

Bakkavor has been a member of the Roundtable on Sustainable Palm Oil (RSPO) since 2012 and submits an [Annual Communication of Progress Report](#) as required by membership. As of 2024, 99.7% of UK-sourced palm oil is from RSPO certified segregated sources that meet our deforestation and conversion free criteria.

[WWF 2024 Palm Oil Buyers Scorecard](#) classed Bakkavor as 'well on path'. The company score increased to position the business in the top 20% of buyers (44/285 globally).

In their sustainable palm oil app, the World Association of Zoos and Aquariums (WAZA) rated Bakkavor as 'excellent, leading the way in helping conserve wildlife and wild places'.

Palm oil - looking forward:

[Bakkavor Sustainable Palm Oil Sourcing Policy](#) has been introduced in 2025. This outlines our commitment to sourcing only RSPO segregated palm oil and participating in Commodity Performance Assessments for Sustainability (COMPASS) that benchmark importer commitments on forest protection, human rights and economic development.

SOY

Soy is a common feed component for farmed animals and is 'embedded' within ingredients such as meat, eggs, farmed fish, milk, butter, cream and cheese.

Bakkavor contracts sustainable sourcing experts 3Keel to measure our embedded soy footprint and assess compliance with our soy policy and [UK Soy Manifesto](#) commitment.

The data in this report details progress for soy sourced during 2024 calendar year based on submissions from 50 suppliers representing approximately 95% of Bakkavor soy consumption.

Soy Supply Chain Data

Embedded soy volume 2024: 22,548 MT

Soy usage by origin

- High risk origin (Brazil, Argentina, Paraguay): 12.8%
- Low risk origin (US, China): 3.2%
- Not disclosed / not known: 84%

Physically verified deforestation and conversion free: 3.3%

In transition towards verified deforestation and conversion free: 96.7%

- Mass Balance certified: 8.7%
- Regional Credits purchased by supply chain: 4.8%
- Regional Credits purchased by Bakkavor: 83.2%

Since 2020, Bakkavor has purchased RTRS Regional credits which support the production of sustainable soy to offset uncertified supplies from origins associated with deforestation.

Supplier soy volume covered by a soy commitment and policy aligned to the UK Soy Manifesto:

- Policy adopted: 33.5%
- Developing Policy: 25.3%
- Undergoing internal review: 11.6%
- No plan/not known: 29.6%

Soy commitment update:

In light of evolving regulatory and industry developments, achieving our original goal of 100% vDCF soy by end 2025 now appears unachievable. The challenges faced by Bakkavor and the UK food sector centre on a lack of available verified DCF soy, and it is anticipated that few - if any - of our comparable peers, suppliers, or customers will meet this target within the same timeframe.

Nonetheless, Bakkavor remains determined to achieve our policy aims as soon as possible. We continue to engage with direct and indirect suppliers, industry bodies, government agencies and customers to increase the availability of vDCF soy to our supply chains. In 2024 meetings were held with our suppliers representing over 80% of Bakkavor soy use, and these have continued through 2025. Feedback from these meetings, alongside discussions within the UK Soy Manifesto group, has highlighted significant sourcing challenges.

Challenges:

Only a small proportion of global soy production originates from land converted after the December 2020 cut-off date. However, Bakkavor - like much of the UK and European food sector, lacks access to reliable evidence to verify soy origin or determine the proportion of imports produced on compliant land.

In late 2024 the implementation of the EU Deforestation Regulation (EUDR) was postponed from January 2025 to January 2026. While the regulation only covers deforestation free - not conversion

free - soy, the delay represents a substantial setback. The geolocation requirements should stimulate greater transparency and support the verification of soy shipments entering the UK.

In the UK, the 2021 Environment Act included Forest Risk Commodity Regulation (UKFRC) that would require companies to conduct and report on due diligence checks that ensures they do not use certain commodities originating from illegally deforested land. The secondary legislation required to translate the requirement into a legal framework for companies has yet to be set out by the current government.

These regulatory delays inhibit the ability of individual companies to signal market demand through complex supply chains and influence the practices of the shippers that control soy supply and that we depend on for compliance evidence.

Soy: looking forward:

In 2025 the Bakkavor [Deforestation and Conversion Free Soy Policy](#) was updated to reflect developments since the first policy was launched in 2022. This details a phased approach to guide our suppliers on sourcing verified deforestation and conversion free (vDCF) soy, with requirements tailored to each livestock origin.

BEEF

Bakkavor commits to only sourcing beef from origins considered low risk of deforestation and conversion to ensure our deforestation commitment is met. The company is a relatively small buyer of beef, mostly supplied from Red Tractor assured or customer approved farms in the UK or Ireland, with a small proportion from customer-approved farms elsewhere in the EU.

WOOD PULP

All wood fibre used in consumer product packaging is FSC or PEFC certified, with that target being achieved for primary wood fibre since 2020 and secondary since 2023.

Wood pulp - looking forward:

[Bakkavor Sustainable Wood Fibre Packaging Policy](#) was introduced in 2025, giving assurance that these standards will be maintained for the future.

While the majority of Bakkavor's forest footprint comes from packaging, we are assessing the small volume of other wood-based products procured by the business to understand their certification status and the viability of extending the policy scope to include other key product categories.

COCOA

From 2025 cocoa will be included in our deforestation commitment and [Bakkavor Sustainable Cocoa Sourcing Policy](#) details how we expect suppliers to deliver our commitment to sourcing cocoa free from exploitation, child labour and forced labour, as well as being deforestation and conversion free. Our goals will be achieved by sourcing Rainforest Alliance or Fairtrade certified cocoa.