

OCEAN SPRAY INTERNATIONAL, INC.
UK MODERN SLAVERY
STATEMENT

(Fiscal Year 2023)



This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 (the “Act”) and constitutes the modern slavery statement of Ocean Spray International, Inc., (“Ocean Spray”) for the financial year ending 31 August 2023.

As a farmer-owned agricultural cooperative and globally recognized brand, we have a unique and wonderful opportunity to make a lasting and positive difference across the world. Connecting Our Farms to Families for a Better Life is more than just a company purpose statement—it’s the foundation for our strategic direction, shaping who we are, and who we want to be, as an organization.

As an organization, we put people first. We make investments in our team members, raise up the communities we serve, and support the livelihoods of our team members and our farmers. That work includes ensuring, through policies, processes, and values-based culture and ethics codes, that we reduce the risk of modern slavery and child labor in our supply chain.

STEPS TAKEN DURING THE REPORTING PERIOD TO PREVENT AND REDUCE RISKS OF FORCED LABOR AND CHILD LABOR

Ocean Spray has undertaken the following steps to reduce the risk that modern slavery and child labor would be used in the production of our goods. Details on these activities are noted throughout this statement:

- Ocean Spray Code of Conduct. Rules of the road all Ocean Spray team members are required to follow to act with integrity in all aspects of their work.
- Supplier Code of Conduct. Development of an Ocean Spray supplier code began in fiscal year 2023.
- External Auditing of Manufacturing Production Facilities. Ocean Spray has been an active Sedex member since 2018, wherein they conduct Sedex Members Ethical Trade Audits (SMETA) regularly at our manufacturing locations.
- Direct Supplier Relationship with our Farmer-Owners. As a farmer-owned cooperative, our cranberry supply comes directly from our farmer-owners pursuant to Cooperative Marketing Agreements (“CMAs”) – their membership agreements.
- Internal Employment Policies. Ocean Spray includes minimum age requirements and child labor prevention measures in this important policy.
- Enterprise Risk Management (“ERM”) Program and Governance. We have a robust ERM program to continuously audit, monitor, and mitigate key risks identified in our organization.
- Ethics Reporting. All team members have access to an anonymous ethics reporting system to raise concerns or questions regarding potential unethical business practices.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Originally founded and incorporated in 1930, Ocean Spray Cranberries, Inc. is a Delaware corporation that operates as an agricultural cooperative, owned by roughly 700 cranberry farmers in the United States, Canada, and Chile. It produces cranberry-based juice drinks, dried fruit, sauce, snacks, and fresh fruit. Ocean Spray International, Inc., is a wholly-owned subsidiary of Ocean Spray Cranberries, Inc. and is also a Delaware corporation, engaged by Ocean Spray Cranberries, Inc. to manage Ocean Spray business activities and contracts outside the United States.

Together, Ocean Spray Cranberries, Inc. and Ocean Spray International, Inc. employ approximately 2,000 team members worldwide, the majority of which are in the United States. Headquarters for Ocean Spray International,

Inc. are located at One Ocean Spray Drive, Lakeville-Middleboro, MA 02349, United States. Ocean Spray Cranberries, Inc. and Ocean Spray International, Inc. do not employ any individuals in the UK.

Activities/Supply Chain

Fruit Receiving

Ocean Spray is not a typical consumer packaged goods (“CPG”) company. Operating as an agricultural cooperative, Ocean Spray’s shareholders are its farmer-owners. This group both delivers cranberries to the cooperative, as patrons, and owns the company, as shareholders.

Under their CMAs, Ocean Spray’s farmer-owners agree to deliver the cranberries harvested from certain acres to Ocean Spray. They deliver those cranberries to designated receiving facilities, which are located in cranberry growing regions in the U.S. (New Jersey, Massachusetts, Wisconsin, Washington, and Oregon), as well as in Canada (British Columbia, Quebec, and New Brunswick) and Lanco, Chile.

These receiving stations are either owned and operated by Ocean Spray or owned and operated by the farmers themselves. Farmer-operated stations are required to have a contractual agreement in place with Ocean Spray.

All receiving stations serve two primary functions: (1) to sample and grade delivered fruit to determine viability and quality; and (2) to clean, sort, and ship fruit to various freezers and/or manufacturing facilities within our supply chain.

Farmers deliver this fruit during the harvest period (September-November for North America, March-June in South America).

Production

Ocean Spray’s production network includes company-owned and operated food and beverage manufacturing facilities in the U.S. (Massachusetts, Pennsylvania, Wisconsin, Texas, Nevada, Washington), as well as Manseau, Canada and Lanco, Chile. All of our facilities are committed to world-class safety and teamwork. Ocean Spray also contracts with co-manufacturing facilities globally. The overwhelming majority of co-manufactured products sold in the UK were produced by co-manufactures located in the UK. Within those vendor relationships, Ocean Spray requires these co-manufacturing facilities to adhere to our high standards for safety and quality, as well as compliance with applicable laws and regulations.

Imports

Ocean Spray’s imports into the UK are nearly all products produced by Ocean Spray facilities located in the United States, Canada or Chile. Imports included finished cranberry goods in the form of branded labelled items and finished cranberry goods for further manufacturing (ex. Frozen cranberries, cranberry concentrate).

POLICIES AND DUE DILIGENCE PROCESSES

Ocean Spray’s Code of Conduct represents our rules of the road. It establishes the behavior that is expected of our team members and our company as a whole. Grounded in our purpose and values, the Code ensures we act with Integrity Above All in every aspect of our work. Every team member is required to take Code of Conduct compliance training.

Our Code is activated through our policies and procedures, which every Ocean Spray team member is required to adhere to and understand. The Code is our means for holding team members and Ocean Spray accountable to

always engage in ethical business practices. In fiscal year 2023, Ocean Spray embarked on a reinvigorated approach to revise and improve all company-wide policies and standard operating procedures. The goal of this revision process was to create consistency and equity among policies, clarify language, and strengthen elements of compliance where necessary.

The 2023 revision process included amendment to our Employment Policy, which now better reflects our commitment to mitigating the risk of child labor. Additionally, our Employment Policy mandates we only select candidates for hire based on all minimum age laws and regulations where we operate. Ocean Spray also utilizes an applicant tracking system, which automatically rejects anyone identified as being under the age of 18 from applying for a role. We also conduct candidate background checks to further ensure no one under 18 is employed at Ocean Spray.

All team members are required to adhere to Ocean’s Spray’s high standards of ethical business practice. This means avoiding unethical behavior and empowering team members to speak up if they witness or become aware of unethical activity. Team members are encouraged to talk with their manager or Human Resources in those instances, but we also offer an ethics reporting platform (web or phone) to make sure team members have an anonymous option for sharing concerns. Part of this commitment is a no-retaliation policy: Ocean Spray will not tolerate retaliation against anyone who reports a concern.

Ocean Spray further developed and enhanced its enterprise risk management (ERM) program in fiscal year 2023, enabling us to be both proactive and protective—a best practice approach that ensures we are identifying and working to mitigate enterprise level risks. Structurally, we have a Management Risk Committee and Charter (to guide the Management Risk Committee), with clearly identified Risk Owners who have responsibility for all risk mitigation planning activities. These plans, and related actions, are reviewed with the Management Risk Committee and reported to the Audit Committee and Board, so that all levels of our organization have line of sight to protect our agricultural cooperative—and by extension our farmer-owners.

Ocean Spray has been an active Sedex member since 2018. Ocean Spray conducts Sedex Members Ethical Trade Audit (SMETA) 4-Pillar audits at all Ocean Spray-owned manufacturing plants regularly to monitor compliance and proactively identify opportunities for continuous improvement. Our Sedex membership provides us with the tools to manage and improve working conditions and adhere to responsible sourcing practices. SMETA is one of the most widely used social audit schemes in the world, providing a globally recognized way to assess responsible supply chain activities, including labor rights, health and safety, environment, and business ethics.

Additionally, Ocean Spray is committed to the highest level of supply chain security. In fiscal year 2023, Ocean Spray began developing a Supplier Code of Conduct. It is slated for release in calendar year 2024.

MODERN SLAVERY AND CHILD LABOR RISKS AND STEPS TAKEN TO ASSESS AND MANAGE THESE RISKS

As noted above, Ocean Spray’s unique structure as a farmer-owned agricultural cooperative (wherein our shareholders are also our cranberry suppliers), coupled with our strong practices, policies, and procedures, keep the risk of modern slavery and child labor low for our organization. What could be considered “highest risk” for our company are areas of our supply chain not fully within our control. That is why we are developing a Supplier Code of Conduct, which will also include an assessment and auditing component when launched.

REMEDIATION MEASURES

In fiscal year 2023, no measures were taken to remediate forced labor or child labor activities in Ocean Spray's supply chains.

TRAINING

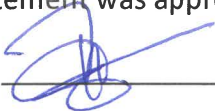
Ocean Spray's Compliance and Training program rotates its mandatory training topics on a regular basis for team members based on business need and level of risk.

ASSESSING THE EFFECTIVENESS IN ENSURING THAT FORCED LABOR AND CHILD LABOR ARE NOT BEING USED IN ENTITY'S BUSINESS AND SUPPLY CHAIN

In addition to our regular policy and process review and enterprise risk assessment and mitigation, in fiscal year 2023 Ocean Spray undertook development of a comprehensive Supplier Code of Conduct, which will include sections prohibiting modern slavery and child labor, slated for release in calendar year 2024. In conjunction with the Supplier Code of Conduct, Ocean Spray will onboard an auditing partner to ensure our suppliers can be assessed for compliance.

The statement was approved by the Board of Directors of Ocean Spray International, Inc., on July 11, 2024.

Signed: _____



Thomas P. Hayes, President and Director

Dated: July 11, 2024