Modern Slavery Statement

Introduction

As part of our ongoing commitment to ethical business practices and human rights, we at Tropicana Products UK Ltd, along with our affiliated corporate entities, share this statement highlighting the steps we have taken to prevent, identify, and address modern slavery risks across our business and supply chain. We are committed to maintaining the highest standards of integrity and transparency in all our business dealings. Promoting human rights, addressing systemic inequities, and highlighting and ameliorating risks within vulnerable populations remain core objectives to this company.

We recognize there is still much work ahead of us to help ensure human rights are fully respected throughout our supply chain and remain committed to helping eradicate forced labour. We are pleased to share the steps our company has taken in our past fiscal year (1st January 2025 to 31st December 2025) to identify, assess, and manage risks of modern slavery within our supply chains. During the reporting period, we continued to implement and monitor the policies and practices described in prior years. No materials changes were made to our approach; however, we maintained ongoing oversight and periodic evaluation of potential risks across our operations and supply chain.

Andrew Riddle
General Manager UK & Ireland
Date: 6 October 2025

About Tropicana Brands Group

Dole, Copella and Punica. Established in 2022 as a joint venture between PAI Partners (a French private equity company) and PepsiCo, Inc. (a United States-based corporation), the company aims to promote new growth for its business, opportunities for its people and accelerate a vision to quench the world's thirst for more delight and nourishment. With a global footprint of more than 2,000 associates that spans North America and Europe, we are proud of our industry-leading capabilities in areas that include innovation, R&D, manufacturing, distribution, sales, marketing and nutrition expertise.

TBG is committed to respecting human rights in our value chain and in the communities where we operate. As a global company, we have a complex value chain that relies on our own operations as well as franchisees, joint ventures, co-manufacturers, and thousands of suppliers to produce and sell our products around the world. We understand our role in contributing to positive human rights impacts and recognize that we have a responsibility to prevent, mitigate, and address adverse impacts through our direct operations and to use our leverage to encourage our suppliers and business partners to respect human rights in our broader value chain.

This Modern Slavery Act transparency statement is made in line with our obligations under the UK's Modern Slavery Act 2015 and builds on our previous Statements by setting out the steps that we have taken during the financial year 2025 to understand potential modern slavery risks and prevent slavery and human trafficking in our business and supply chain. This statement covers the activities of Tropicana Products UK Ltd and its subsidiaries.

Human Rights Approach

At TBG, our guiding principles provide that we will respect others and succeed together. We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business, which we continuously review and update as necessary.

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Our approach is guided by the United Nations Guiding Principles on Business and Human Rights. We are committed to respecting all of the human rights described in the International Bill of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work. We are also a signatory to the United Nations Global Compact and follow the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises.

We recognize that our responsibility to respect human rights exists regardless of whether countries fulfil their duty to protect human rights. This can pose a challenge, as instances may arise where national law and international human rights standards do not align. Where they differ, we will seek to follow the higher standard. Where they conflict, we will comply with national law and explore alternative ways to respect international human rights standards to the greatest extent possible.

Company Policies

TBG has a number of policies in place, both internal and external facing, specific to preventing modern slavery, which we continuously review and update:

Global Code of Business Conduct: TBG's Global Code of Business Conduct reinforces our policies and sets out the behaviours that we expect of employees to ensure that we meet regulatory and ethical standards and live our values day to day. We expect all employees to comply with all laws and regilations without compromise, as well as all other TBG policies. It explains what 'doing the right thing' means for our company, including with respect to human rights and speaking up about concerns, and incorporates TBG's other policies listed below. The Code applies to all staff worldwide, regardless of their role or seniority. The Global Code of Conduct is hosted on our intranet and available to all employees in the UK, Ireland and Europe.

Global Supplier Code of Conduct: TBG requires that all suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with or on behalf of TBG ("suppliers") incorporate TBG's Global Supplier Code of Conduct into its contracts with us. The Global Supplier Code of Conduct makes clear that:

- **TBG explicitly prohibits all forms of forced or compulsory labour**. TBG suppliers must maintain and promote fundamental human rights including freedom of movement of workers. TBG does not tolerate any use of coerced or prison labour, use pf physical punishment or threats of violence, or other actions aimed to prevent freedom of movement or termination of employment.
- **TBG prohibits the use of child labour**. TBG suppliers must adhere to the minimum employment age limits defined by national law or regulation, and must also comply with relevant International Labor Organisation (ILO) standards. Additionally, TBG prohibits the hiring of individuals under the age of fifteen (15), the local legal minimum working age, or the compulsory schooling age, whichever is higher. Additionally the policy provides that "in no instance shall a supplier permit children to perform work that exposes them to undue physical risks that can harm their physical, mental or emotional development or improperly interfere with their education or vocational needs."
- **Suppliers must provide safe and healthy working conditions**. TBG requires its suppliers to proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. Additionally, suppliers must provide access to safe drinking water, sanitation and hygiene, and essential safety equipment.

The full text of our Global Supplier Code of Conduct is available on our website at https://www.tropicanabrandsgroup.com/suppliercode.

Suppliers are expected to communicate and apply the Global Supplier Code of Conduct and relevant policies throughout their supply chains and certify their respective compliance. The policy also allows TBG to conduct reasonable audits, as necessary, and also requires suppliers to have a system in place to allow for reporting of suspected violations of the policy. Failing to meet our ethical standards will result in the vendor not being accepted as a TBG supplier. TBG's continued focus on compliance-related policies reinforces expectations for ethical conduct across its operations and interactions with suppliers and business partners.

Human Rights Workplace Policy: TBG's Human Rights Workplace Policy prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour, ad any other form of human trafficking. Similarly to what we expect from our suppliers, TBG commits to maintaining an environment that provides humane and safe working conditions, and only hiring individuals over the age of fifteen (15), or the local legal minimum working age or compulsory schooling age, whichever is higher.

Our Human Rights Workplace Policy incorporates the principles that guide our approach to human rights, and specifically cites to the principles contained in the International Bill of Human Rights, International Labor Organization Declaration on Fundamental Principles and Rights at Work, United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights.

TBG is dedicated to providing and maintaining a safe and healthy workplace that is free from violence and intimidation and respects our employees' rights to join, form or not join a labour union. Staff are encouraged to report all violations of this policy through the TBG ethics hotline without fear of reprisal.

Global Human Rights Policy: Under this policy TBG commits to respecting human rights in our direct operations and relationships with business partners. Pursuant to this policy, we manage human rights risks through shared responsibility between our Human Resources and Legal Department. Between these two functions, our Global Human Rights policy outlines how we assess human rights impacts, integrate human rights findings, provide possible remedies and engage external stakeholders when necessary.

Sustainable Agriculture Policy: this policy aims to protect farm workers and improve community wellbeing and environment, which includes proactively managing health and safety risks and allowing employees to receive fair and reasonable treatment with respect to working hours, wages and benefits and accommodation.

TBG Ethics Hotline: To the extent any Tropicana employee is concerned there is any violation within TBG or its suppliers, they are encouraged to utilize a number of reporting mechanisms, including an anonymous Ethics Hotline. This is managed by a third-party vendor and is available 24/7 and 365 days a year. Reporters do not need to be TBG employees to access the hotline, and the hotline is available both by telephone in all the countries TBG operates, as well as via the web. Any concerns reported via the hotline or through line management are referred to the TBG Legal Team, and all matters are treated in the strictest confidence. Concerns can be reported anonymously and are investigated as quickly and thoroughly as possible, and the identity of the person reporting the concern is protected, regardless of the outcome of the investigation. The Board receives reports on all concerns raised and progress towards resolving them at every Board meeting. No concerns related to modern slavery were raised in 2025.

Recruitment & Resourcing Policy: At TBG, we check for signs of modern slavery across the entire life cycle of an individual's employment. In Great Britain and Ireland, we ensure that right to work checks are completed for all employees on or before their first day of employment, in line with UK and Irish legislation. In cases where evidence of a new starter's right to work cannot be provided or validated on or before their first day of employment, they will be unable to undertake any work for us until they can produce satisfactory evidence. Where appropriate, we will help support the new starter with obtaining their right to work document or share code so that they can commence their employment with TBG. Right to work checks are vital in helping to eliminate illegal migration in Great Britain and Ireland. TBG has robust right to work checks in place to prevent any persons working illegally within the organisation, and subsequently reduces the risk of individuals becoming vulnerable to exploitation and slavery.

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Global Anti-Harassment and Non-Discrimination Policy and Workplace Violence Policy: TBG is dedicated to maintaining a safe work environment that is free from all forms of harassment, discrimination and violence. These policies apply to all TBG employees as well as third parties such as vendors, customers, temporary personnel, and visitors, and underscores TBG's zero-tolerance policy for harassment or discrimination, as well as the responsibility of everyone involved in TBG business to report violations of this policy.

During the reporting period, TBG enhanced its broader compliance framework through updates to several enterprise policies, including its Anti-Bribery Policy, Gifts and Entertainment Policy, and introduced a new Travel and Expense Policy. Whilst these updates were not specific to forced labour or child labour, they strengthen TBG's overall governance and oversight of business conduct and third -party interactions, which support TBG's ability to promote responsible sourcing and ethical supply chain management.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular training to our staff. TBG requires its employees to complete an annual training on TBG's Global Code of Conduct and associated policies. We track attendance for this training, which is offered annually. The training is interactive and self-guided, with modules on anti-harassment/global human rights, anti-bribery and anti-corruption, anti-discrimination, and conflicts of interest. Before an employee is allowed to "complete" the training, they must participate in every aspect, including interactive questions and answers with explanations, and must open TBG's policies and acknowledge they have read and understood them. To the extent any TBG employee is concerned there is any violation within the company or its suppliers, they are encouraged to utilise a number of reporting mechanisms, including an anonymous hotline.TBG continues to evaluate its trainings and is committed to providing comprehensive training to its employees with respect to forced labour and human trafficking.

We also require our business partners to ensure their staff, suppliers, and providers comply with our Global Supplier Code of Conduct.

Business Operations and Supply Chain

Tropicana Products UK Ltd is a subsidiary of TBG's US-based parent company. Tropicana Products UK Ltd is an international juice-based beverages business that operates in 13 countries under the Tropicana, Naked, Copella and Punica brands. Our European business is headquartered in the UK with manufacturing operations in the UK, France, Germany, Switzerland and Belgium. Our products entering the UK market are primarily manufactured by Belgian-based employees at our factory in Belgium but we also utilise co-manufacturers in Europe where appropriate. After the products are manufactured, TBG distributes them through a variety of means, including freight and trucking operations. We directly employ over 500 people and have a diverse supply chain of approximately 650 suppliers, sourcing raw materials and ingredients, packaging materials and other goods and services from over 30 countries, including Austria, Brazil, Costa Rica, Ecuador, Germany, India, Italy and Vietnam. Our suppliers range in size from small and medium-sized enterprises to large multinationals, each of which has its own supply chain. We work closely with our suppliers to encourage commitment to ethical practices and to identify human rights risks. Specifically, TBG's main orange supplier in Brazil is certified as sustainably sourced under the SAI Platform Gold Standard, which covers employment practices, which certification was obtained, at Tropicana's request, pursuant to our supply agreement. After the products are manufactured, TBG distributes them through a variety of means, including freight and trucking operations. Distribution of TBG products is performed by a combination of EU and UK based TBG employees or EU and UK based employees of transport vendors. There have been no material changes to TBG's structure, activities or supply chains during the reporting period.

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We are aware that there are greater risks of modern slavery associated with juice agriculture and manufacture and we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. Because the operations for products entering the UK are entirely manufactured within the UK and Europe, and primarily by employees Tropicana employs directly, the risk of forced labour or child labour is very low. We only hire employees who are over the age of 18 and have sufficient documentation to confirm they are eligible to work in the relevant country.

The highest risk areas for forced labour or child labour TBG has identified lie further back within our supply chain. TBG primarily purchases fruits, juices, flavorings, extracts, and packaging from third-party suppliers. While some of these suppliers source and operate domestically, much of our agricultural spend comes from companies sourcing products from countries outside Europe which TBG has internally determined as higher risk than the UK or Europe for issues such as forced labour or child labour due to the labor-intensive fruit harvesting processes. While these activities are higher risk, Tropicana has not identified any specific instances of modern slavery.

Internally, TBG employees are all compensated above any minimum-wage requirements within each country in which TBG operates.TBG employees also have access to employer-sponsored health and welfare coverage. Additionally, Tropicana pays its employees all wages earned in a timely manner and any Tropicana employee who wishes to leave employment will be paid all wages owed in a timely manner.

Externally, through its Global Supplier Code of Conduct, Tropicana requires its suppliers to treat its employees fairly, including with respect to wages, working hours and benefits. Specifically, the policy requires suppliers to “comply with all applicable wage, working hours, and benefits laws and regulatory requirements.” The policy also asks suppliers to “meet international standards for working hours and rest periods”. Tropicana also asks that if its supplier does not meet these international standards, that it conduct a root cause assessment and remediate its practices.

Supplier Onboarding

While the current business entities that make up TBG, including Tropicana Products UK Ltd, were recently formed, the majority of TBG’s higher-risk suppliers were engaged and onboarded while the business was controlled and operated by PepsiCo, Inc. In 2025, TBG did not onboard any new large or, in its view, higher-risk suppliers. PepsiCo, Inc. has a robust onboarding process for its suppliers, including an analogous supplier code of conduct with open-access training. In addition to policies, PepsiCo, Inc. performed due diligence on its highest risk suppliers (in turn, TBG’s current higher risk suppliers) through its Human Rights Assessment Program, which includes audits conducted by independent, third-party auditors that align with Sedex Members Ethical Trade Audit (SMETA) protocol requirements. This due diligence also includes remote monitoring tools, such as worker voice surveys, to collect anonymous worker feedback on key issues such as workplace safety, working hours, and labour standards.

Supplier Monitoring

TBG continues to monitor, evaluate and report on higher-risk activities within its supply chain. TBG’s procurement team has visited the primary agricultural suppliers, both within the United States and in Mexico and Brazil and regularly visits our key juice supplier in Brazil, including in 2025. Through these visits, TBG was able to confirm its suppliers were upholding their commitments outlined in the Global Supplier Code of Conduct. Additionally, on-site visits help us better understand the harvesting process, which equips TBG with continuous learning and improvement in our efforts to confirm our supply chain does not utilize forced labour or child labour.

In addition, during the reporting period, TBG continued to advance its broader ESG and sustainable agriculture initiatives, including work related to a global double materiality assessment aligned with regulatory frameworks such as the EU's Corpporate Sustainability Reporting Directive. As part of this process, TBG is identifying and evaluating potential impacts, risks an opportunities across its value chain, including those related to working conditions, supply chain labour practices, vulnerable communities and relationships with suppliers. These efforts involve engagement with internal stakeholders and are designed to enhance visibility into higher-risk areas of the supply chain. This work complements TBG's existing due diligence framework by supporting a more structured and ongoing assessment of human rights risks, including those related to force labour and child labour.

TBG also continues to review best practices and industry standards for supply chain compliance, and when appropriate, requests changes to practices for suppliers. While TBG has not identified any instances of modern slavery or human trafficking in our supply chains, we continue to monitor and develop assessment protocols to ensure ongoing compliance.

Modern Slavery and Human Rights Governance

Day-to-day responsibility for Human Rights at TBG sits with our Chief Human Rights Officer (CHR Legal Officer (CLO). Our CHRO and CLO may provide periodic updates to the TBG Board of Directors for their review of significant human rights issues and changes to our management approach.

Due diligence processes for slavery and human trafficking

We manage our human rights risks by assessing adverse human rights impacts in our value chain; integrating these findings into our internal systems, controls, and processes; tracking the effectiveness of our actions and influence and; communicating with our external stakeholders.

Assessing Human Rights Impacts

Our initial focus has been on our own operations, first-tier suppliers, and agricultural partners. These areas were identified through internal assessments and feedback from external human rights experts as the points in our value chain where we have the greatest leverage (i.e., our operations) to prevent and respond to human rights impacts and where the risks to rights holders is highest (i.e., supply chain and agricultural partners).

In addition, our CHRO and CLO from time to time reviews our business activities, risk assessment findings, and feedback from internal and external stakeholders to determine the most salient issues to rights holders in our value chain, such as:

- Freedom of Association
- Human Right to Water
- Land Rights
- Vulnerable Workers
- Working Hours and Wages
- Workplace Safety

Integrating Human Rights Findings

We use findings from our assessment programs as well as internal and external stakeholder feedback to identify potential impacts and priority geographies. We integrate what we learn into internal practices, training programs, and management systems to prevent adverse human rights impacts in our direct operations.

Providing Possible Remedies

In line with the UN Guiding Principles on Business and Human Rights, we are committed to providing effective remedy where we have caused or contributed to adverse human rights impacts. Where we find impacts directly linked to our business relationships, we will use our influence to encourage our suppliers and business partners to respect human rights. In order to ensure access to a transparent, confidential, and safe process for investigating grievances of affected parties, we will use appropriate grievance mechanisms, such as the TBG Ethics Hotline, to provide for anonymous reporting of suspected breaches of our policies. We encourage our suppliers and business partners to use their own effective grievance mechanisms and make the TBG Ethics hotline available for their use.

Engaging External Stakeholders

We regularly consult with external stakeholders and human rights experts on our overall approach to human rights, specific allegations, and our salient issues. We understand the importance of capturing the voice of rights holders, and we are exploring ways to better integrate their feedback into our management of issues as they arise. We also participate in conferences and business initiatives to improve our knowledge of specific issues and management approaches and to encourage industry-wide progress, where it is needed.