

Bonduelle Responsible Lobbying and Advocacy policy

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Reviewer	Global Impact Director Group Legal Director Corporate Communication Director
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Bonduelle, an international food group specializing in vegetables, conducts lobbying, advocacy and interest representation activities with public institutions in France and European Union. As transparency and accountability standards for businesses continue to rise and societal expectations on corporate responsibility grow, the Group has chosen to formalize its lobbying practices through a dedicated policy. This approach is part of its broader environmental and social commitments (such as SBTi, B Corp, SDGs) and aims to ensure that its influence activities remain aligned with its core values: transparency, integrity, and impact. The policy also addresses risks related to conflicts of interest, inappropriate political contributions, and positions that could contradict the Group's environmental or ethical commitments.

Bonduelle Group Commitments

Policy objectives

This policy aims to define a clear and demanding framework for all lobbying and advocacy activities conducted by Bonduelle. It sets out the applicable principles, rules and responsibilities to ensure that these activities contribute to the Group's environmental and social objectives, in line with its commitments.

It also aims to prevent any risk of misconduct, particularly regarding political contributions, conflicts of interest, corruption, or positions contrary to Bonduelle's environmental, social, or ethical commitments. Finally, it forms one of the cornerstones of the Group's transparency framework, foreshadowing the future annual public report on its lobbying activities.

Transparency International defines lobbying as “any direct or indirect communication with public officials, political decision-makers or representatives for the purposes of influencing public decision-making and carried out by or on behalf of an organized group. Lobbying can also include direct or indirect attempts to influence public opinion, outside of normal advertising and marketing activity, with a view to impacting public decision making” (TI CPEI 2018, p.35).

Interest representation, or lobbying, is a vital part of any healthy deliberative democracy. When it is practiced openly and honestly, lobbying can play an important role in informing government policy and making sure that legitimate points of view, including those of business, are heard during a public debate. Transparency International is a global NGO dedicated to fighting corruption and promoting transparency, accountability, and integrity in governments, businesses, and civil society.

For Bonduelle, engaging responsibly in public debate is essential because food systems are at the heart of major environmental and social challenges, including climate change, sustainable agriculture, and access to healthy food. As a long-standing player in these ecosystems, the Group has a responsibility to ensure that its voice, positions, and actions contribute positively to the transformation of these systems. This policy reflects Bonduelle's commitment to act with integrity, consistency and transparency, ensuring that its advocacy activities are fully aligned with its purpose, its impact ambitions and the expectations of its stakeholders.

Reference frameworks & regulatory context

Reference Frameworks

Bonduelle approach to advocacy is based on the principles and objectives of the following frameworks (non-exhaustive list):

Sustainability and trajectory frameworks

- **SBTi (Science Based Targets initiative)** – aligned with Bonduelle’s validated decarbonization trajectory

Responsible conduct frameworks

- **OECD Guidelines for Multinational Enterprises** – particularly the 2024 revised recommendation on transparency and integrity in lobbying and influence activities, which constitutes the first international reference standard in this area
- **B Corp v2.2 Standard, requirement GACA 1.1 – External reporting on advocacy** (central framework of this policy)
- **United Nations Sustainable Development Goals (SDGs)** – in particular **SDG n° 2, 3, 8, 12, 13, and 15** (Sustainability report p.14) Bonduelle’s priority advocacy topics, e.g., SDG 2 Zero Hunger, SDG 12 Responsible Consumption and Production, SDG 13 Climate Action)

Regulatory Framework for External Reporting on Lobbying Activities

Bonduelle’s public affairs and advocacy activities are subject to applicable legal requirements in each relevant jurisdiction, including:

- **France – Sapin II Law** (Law no. 2016-1691 of 9 December 2016 on transparency, anti-corruption, and the modernization of economic life): respect of Sapin II Law, and, if relevant, mandatory registration in the lobbyists’ register maintained by the *HATVP* (High Authority for Transparency in Public Life) for any influence activity targeting French public authorities.
- **Other jurisdictions:** in countries where Bonduelle operates and where national provisions regulate lobbying and advocacy activities, applicable local requirements are complied with.

Scope / Field of Application

This policy applies to all entities in Europe, controlled by Bonduelle, knowing that our medium-term goal is to extend this policy across the Group.

It applies to all European geographical areas where the Group operates, as well as to employees and public affairs consultants who, in the course of their duties, interact with representatives of public authorities or participate in the development of public policies on behalf of Bonduelle.

It covers all lobbying, advocacy, and influence activities in the broadest sense, whether conducted directly by Bonduelle (bilateral or multilateral meetings, responses to consultations, public statements, participation in working groups, etc.) or indirectly through professional associations, interprofessional bodies, multi-stakeholder coalitions, or other organizations of which the Group is a member or whose activities it funds.

The policy does not prevent employees to individually exercise their right to express their personal opinions, or support, financially or otherwise, the political candidate of their choice, in accordance with our guide to preventing corruption and influence peddling: Our ethical and anti-corruption approach | Bonduelle Group

Responsibility, approval and review

The person responsible for implementing the policy is the Chief Strategy, Brands and Impact Officer.

Bonduelle Group's Responsible lobby Policy has been overseen and approved by the Global Executive Leadership Team (GELT). The Bonduelle Group, with the support of its relevant governance bodies, is committed to ensuring compliance with this policy.

The policy will be reviewed annually and updated if needed.

Publication and communication

Interested stakeholders can find the policy on the company website at www.bonduelle.com.

Policy Implementation

1. Key topics

Bonduelle engages with public authorities and policy processes because well-designed regulation is essential to building a sustainable and resilient food and agriculture system. Our lobbying activity is anchored in a clear purpose: to advocate for policies that support the long-term health of people, ecosystems, and food supply chains, in line with our Impact strategy and our commitment as a company on the path to B Corp certification.

We advocate and engage in public affairs on four key topics at Bonduelle :

- Health & nutrition: good plant rich food for all
- Sustainability & climate
- Agriculture/Sustainable farming and food sovereignty
- Transparency for consumer

In addition, certain specific advocacy topics, such as trade defense against third country illegal unfair competition, customs, taxation or public funding, as well as critical issues linked to current events, may be addressed on a case-by-case basis through dedicated processes, involving relevant internal and external stakeholders.

Our positions on policy matters are grounded in reliable scientific data and evidence-based research, including findings from recognized scientific bodies and peer-reviewed literature. Where scientific consensus exists — on climate change, biodiversity loss, soil health, or food safety — our advocacy will not contradict it. Where evidence is evolving or contested, we commit to acknowledging uncertainty transparently rather than selectively amplifying data that supports a predetermined outcome.

On financial and in-kind political contributions, Bonduelle takes a restrictive approach. We do not make direct financial contributions to political parties, candidates, or electoral campaigns in any jurisdiction where we operate. In-kind support is permitted only where it serves a clear public interest purpose, is disclosed internally, and is approved by the locally designated accountable leader. This commitment applies equally to contributions made indirectly through trade associations or coalitions.

Bonduelle has zero tolerance for corruption and bribery in all forms of political engagement. No employee or representative of Bonduelle may offer, promise, or provide anything of value to a public official, legislator, or their representatives in connection with lobbying activity. This commitment is detailed in Bonduelle's Guide to preventing corruption and influence peddling (Link: [Our ethical and anti-corruption approach | Bonduelle Group](#)). Commitments relating to human rights, ethics, and compliance may also be integrated into contractual relationships with the Group's partners and suppliers.

When engaging through intermediary organizations — including industry associations and multi-stakeholder coalitions — Bonduelle monitors the positions taken by those bodies to ensure consistency with this policy. Where a third party takes a public position that materially contradicts our own commitments, we reserve the right to express our disagreement within that organization. If the misalignment persists and is significant, we are prepared to publicly disclose the divergence or, where necessary, withdraw from the organization.

2. Channels used

Bonduelle conducts its lobbying activities through three channels: direct engagement with public authorities and political institutions, participation in industry associations, and involvement in multi-stakeholder coalitions and platforms. Where external public affairs consultants are engaged, they are subject to the same standards as internal staff, are formally mandated in writing, must comply with Bonduelle's Guide to preventing corruption and influence peddling. All engagement, whether direct or through third parties, falls within the scope of this policy.

Direct engagement with public authorities. Bonduelle may engage directly with elected representatives, government ministries, regulatory agencies, and parliamentary committees at national and European levels. This takes the form of bilateral meetings, written consultation responses, and participation in expert working groups.

Industry associations. Bonduelle holds membership in sector associations at national and European levels, with levels of involvement ranging from Board representation to working group participation. Where an association adopts a position that materially contradicts our commitments, we raise the matter formally within its governance. If the divergence remains unresolved, Bonduelle is prepared to publicly disclose the misalignment or withdraw from the body.

Multi-stakeholder coalitions. Bonduelle participates in cross-sector coalitions bringing together companies, civil society, scientific bodies, and public institutions around shared policy objectives — primarily on sustainable land use, climate-smart agriculture, biodiversity, and food system resilience, but also in collective actions promoting plant-rich food. We seek coalitions that are thematic rather than purely sectoral and that drive concrete policy ambition.

Employees playing an active role in these bodies must have sufficient seniority and authority to engage substantively and follow compliance trainings sessions (Anti-competitive practices trainings, Anti-Corruption trainings) in line with ethical affairs (preventing corruption and anti-competitive practices).

In all three channels: positions must be grounded in scientific evidence and consistent with Bonduelle's sustainability commitments. A register of active memberships, significant direct engagements, is disclosed annually on our website www.bonduelle.com.

3. Team in charge of policy implementation

Role	Poste / Region
SPONSOR / RESPONSABLE	Chief Strategy, Brands and Impact Officer
TEAM LEADER	Global Impact Director
WORKING TEAM	European business impact manager, Regulatory affairs manager Europe, External Relations and Governmental Affairs

4. Communication of the policy

Interested stakeholders can find the policy on the company website at www.bonduelle.com.

5. Governance, Control and Risk Management

Accountability

The Chief Strategy, Brands and Impact Officer hold executive accountability for the implementation and enforcement of this policy and is responsible for ensuring it is applied across all business units and geographies in which Bonduelle operates. Day-to-day operational responsibility — including maintaining the register of lobbying activities, monitoring alignment with external organizations, and coordinating training — is delegated to the European regulatory committee.

Embedding the policy in practice

Bonduelle embeds this policy through authorization and operational controls consistent with the group's Internal Control Manual. Only employees formally designated by the Regulatory board are authorized to engage in lobbying activities on behalf of Bonduelle — whether through direct contact with public authorities, participation in trade association governance, or representation in multi-stakeholder coalitions. Designated employees must complete compliance trainings (Anti-competitive practices trainings, Anti-Corruption trainings) in line with ethical affairs (preventing corruption and anti-competitive practices). Significant lobbying engagements are logged in the internal register maintained by the External Relations and Governmental Affairs and reviewed annually by the Regulatory Board.

Risk identification, management and monitoring

Annual review will be done by the European Regulatory Board - including Chief Strategy, Brands and Impact Officer, Bonduelle Europe Chief Executive Officer, and Chief Operations Officer - as part of the policy review cycle.

This annual review covers Bonduelle's participation in industry associations, public bodies and sector groups, including the list of memberships, annual contributions, internal representatives, and their key positions. Multi stakeholders coalition participation will be also reviewed. It is prepared by External Relations and Governmental Affairs with the European Regulatory Committee.

Bonduelle identifies lobbying-related risks through two mechanisms. First, an annual review of all external organizations in which the group holds membership or makes financial contributions, assessing whether their public positions remain consistent with this policy. Second, ongoing monitoring of significant public statements and advocacy outputs from those organizations, with specific attention to positions on legislation or regulation relevant to Bonduelle's Impact

commitments. This review is conducted by the European Regulatory board, in line with the group's annual risk mapping process. Where a risk of misalignment is identified, the Regulatory Board is responsible for reviewing the matter and ensuring that Bonduelle's position is clearly expressed within the relevant organization. If the misalignment is significant or persists, the matter is escalated to the GELT to determine the appropriate response, which may include formal clarification of Bonduelle's position, public disclosure of the divergence, or, as a last resort, withdrawal from the membership body.

Compliance evaluation

Application of this policy may be periodically reviewed within Bonduelle's governance and compliance framework. The Policy Owner is responsible for maintaining evidence of implementation and compliance with the policy requirements. Internal Audit may, where appropriate and in accordance with its risk-based audit plan, review this evidence and assess whether the related control process has been effectively applied.

Grievance and concerns procedure

Any employee, business partner, or external stakeholder who has concerns about Bonduelle's lobbying activities or compliance with this policy is encouraged to raise those concerns through Bonduelle's whistleblowing system. The platform is hosted by an independent external service provider, is accessible to all employees and external stakeholders — including suppliers, subcontractors, and customers — and allows concerns to be raised confidentially and anonymously. It is accessible via the "Submit an alert" page at www.bonduelle.com. A dedicated investigation procedure exists for the processing of alerts, with collegial and impartial governance. Raising a concern in good faith will not expose the person who raised it to any retaliation.