





Animal Health & Welfare Policy

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About AB Agri

AB Agri is the agriculture division of Associated British Foods plc, a diversified international food, ingredients and retail group, listed on the London Stock Exchange. AB Agri occupies a unique position across the agri-food supply chain. Its focus is to add value and drive profit for partners all along that chain, by improving the sustainability of food production. This is achieved by investing in research and development, driving the use of technology and exploring how data can deliver insight. A top three player in almost all the markets in which it operates, AB Agri is expanding its global footprint, to become a major international agri-business.

Executive Summary

Our Group's core operations are in agricultural supply chains where we supply animal nutrition products to livestock farmers or animal nutrition ingredients to companies who manufacture animal feed products, particularly for ruminant, pig, poultry and to a lesser extent, fish, as well as equine, pets and game birds.

This Animal Health & Welfare Policy sets out our belief that all animals should be treated humanely throughout their lives. This is a responsibility we are acutely aware of and take very seriously.

We believe that the health and welfare of animals should be considered in the selection of all production systems, practices and technologies and we advocate all farming methods that benefit animal health and welfare as well as people and the environment.

We support the globally-recognised "Five Freedoms[1]" of animal welfare as an aspiration for animal welfare in our supply chains:

- 1. Freedom from Hunger and Thirst by ready access to fresh water and a diet to maintain full health and vigour.
- 2. Freedom from Discomfort by providing an appropriate environment including shelter and a comfortable resting area.
- 3. Freedom from Pain, Injury or Disease by prevention or rapid diagnosis and treatment.
- 4. Freedom to Express Normal Behaviour by providing sufficient space, proper facilities and company of the animal's own kind.
- 5. Freedom from Fear and Distress by ensuring conditions and treatment which avoid mental suffering.

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1. Management Commitment

1.1 Purpose and Objectives

AB Agri's core operations are in agricultural supply chains, particularly ruminant, pig, poultry and to a lesser extent, fish, as well as equine, pets and game birds.

Through the various activities of the Group, there exists the possibility of the Group or an Employee having a direct and/or indirect impact on the health and welfare of animals where we interface with the supply chain. Operations of the Group may on occasion mean that Employees are also in a position to witness animal health and welfare issues at third party locations. Accordingly, animal health and welfare has been identified as a potential risk through the Group's management process.

In particular, animal health and welfare is relevant to us in three areas:

- Sullivan's poultry, our UK business which contracts with UK Broiler producers;
- Several AB Agri businesses that sell animal feed products directly to the livestock producer or who are involved livestock unit data management principally in the EU and China; and
- Any livestock products that are used by our businesses as feed materials in the manufacture of their products.

This policy sets out the Group's position in relation to the welfare of any animals where we interface with them.

1.2 Scope

This policy is applicable to all of the AB Agri Group's employees and operations globally.

1.3 Policy

We endorse the internationally accepted 'five freedoms' for animal welfare:

- 1. Freedom from Hunger and Thirst by ready access to fresh water and a diet to maintain full health and vigour.
- 2. Freedom from Discomfort by providing an appropriate environment including shelter and a comfortable resting area.
- 3. Freedom from Pain, Injury or Disease by prevention or rapid diagnosis and treatment.
- 4. Freedom to Express Normal Behaviour by providing sufficient space, proper facilities and company of the animal's own kind.
- 5. Freedom from Fear and Distress by ensuring conditions and treatment which avoid mental suffering.

We support the measurement of an animal's welfare by objective measures.

Listed below are the significant contact points for the Group and any specific standards that apply in each case:

1.3.1 Technical and Nutritional Advice

As part of the Group's Operations, Employees are involved in providing technical and nutritional advice to customers and third parties. The content and application of this advice has the potential to impact on animal health and welfare and where practicable the opportunity will be taken to provide advice that has the potential to improve animal health and welfare.

In the UK we support the Feed Advisor Register initiative, which includes animal health and welfare modules.

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1.3.2 Research and Development (including Feed Ingredient and Compound Feed Trials)

As part of the Group's Operations, feed ingredient and compound feed product trials are run on commercial farms. In addition, similar trials may be carried out in strict scientifically controlled conditions, often within universities and research establishments, which are governed by their own welfare and ethics codes and approval committees. Trials undertaken on our behalf must comply with all applicable animal health and welfare regulations and, where applicable, be covered by UK Government Home Office licencing. These trials replicate standard commercial conditions on farms and are designed to ensure our products support healthy and efficient animal production.

1.3.3 Laboratory Animal Testing for Feed Product Approval

AB Agri avoids the use of animal testing wherever possible and does not maintain any laboratory animal testing facilities. Under infrequent circumstances, where governmental agencies require animal testing to demonstrate safety or quality, e.g. as part of EU approval for feed additives such as enzymes, studies, incorporating the feed ingredient (feed materials and feed additives), are completed by accredited third-party facilities that follow and adhere to proper animal welfare guidelines.

1.3.4 On-farm

As part of the Group's Operations Employees are frequently required to visit farm sites. Through these activities Employees may become aware of both potential and actual animal welfare issues related to both feeding practice and/or environmental conditions (such as feed access, water supply, lighting, ventilation, lying space). Employees who become aware of animal welfare issues that contravene the five freedoms listed above, are required to report this observation under the procedure listed below (2.2).

1.3.5 Product Specification

Professional Animal Nutritionists specify the Group's products. The main objective is to meet the animal's nutritional requirements covering both macro nutrients of energy and amino acids through to micro-ingredients that aid physiological and immune function, digestion and nutrient utilisation. These ensure our nutritional products do not compromise animal welfare through nutritional deficiencies or imbalances and, where practicable, have a positive impact on animal health and welfare when used following correct feeding guidelines as advised by the Group's Employees.

1.3.6 Contract Broiler Growing Operations

The UK is the only country globally where we have a direct connection with livestock through our contract broiler growing operations. We do not own or manage livestock production outside of the UK.

All birds must be provided with an environment to stimulate natural behaviour, including perches and pecking substrates, such as bales. Our contracted growers have the inclusion of natural light in all bird houses, through the installation of windows at 1% of the floor area, increasing to 3% by 2023.

We support growers by providing on farm technical advisors, who are responsible for monitoring animal welfare and health status to ensure that the poultry supplied adheres to our, and any industry, standard.

1.3.6.1 Close Confinement

Planned stocking densities must not exceed 38kg/m² for broilers and 30kg/m² for poussin.

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1.3.6.2 Routine Mutilations

Mutilations are not permitted (including beak trimming).

1.3.6.3 Pre-slaughter Stunning

We do not operate slaughterhouses, however The Group recognises that the Welfare of Animals (Slaughter or Killing) Regulations 1995 permits slaughter without stunning to be carried out in accordance with religious rites. Stunning prior to slaughter will be used in all circumstances, other than where religious rites require use of alternative procedures. These regulations are monitored and enforced by Official Veterinarians of the Food Standards Agency to ensure that animals are spared unnecessary suffering, distress or pain during the slaughter process.

1.3.6.4 Long Distance Transportation

In the UK, The Group will only contract hauliers that operate in accordance with guidance as defined below;

- All birds must be transported by transporters registered with the Red Tractor Poultry Scheme
- The haulier must adhere to all current legislation that applies to the transport of birds
- Each vehicle must carry a written statement of maximum stocking density
- The time between start of loading and end of unloading at the processing plant must not exceed twelve hours²
- · In addition, we actively work with our hauliers to achieve a maximum eight hour transport time

All routes are planned from the farm to the slaughterhouse, mapping the shortest possible route that will not exceed the 8 hour transportation time. The transport is provided by contract hauliers.

We do not transport animals outside of the UK.

1.3.6.5 Enrichment

For environmental enrichment the following must be provided:

- Bales/boxes
 - at least 1 bale/ box per 1000 birds used throughout the bird's life
 - bales are wrapped or treated
 - bales are placed in the house prior to chick placement
- Perches/ platforms
 - 2 linear metres of perches per 1000 birds
 - 0.3m2 of platform per 1000 birds
 - perches/ platforms should be no more than 15cm off the ground
- · Pecking objects
 - at least 1 pecking object per 1000 birds
- When reusable, environmental enrichment is capable of being cleaned and disinfected

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2. Governance and Management

2.1 Accountability and Responsibility

All Line Managers of relevant Employees are responsible for making themselves and their direct reports aware of this policy, its content and its potential impact.

It is the responsibility of all Employees to understand and adhere to the requirements of the policy, and to report non-compliance (see Section 2.2).

It is the responsibility of each of the Group's Business Managing Directors to administer and ensure compliance.

The AB Agri Risk Manager is accountable for the content and version control of this policy; it will be formally reviewed annually and changes will be notified to Employees.

2.2 Control Systems

Where an Employee becomes aware of a serious and/or long-term unmanaged and/or unresolved non-compliance with this policy, the Group asks:

2.2.1 Technical Employees / Feed Advisors

Technical employees (and in the UK, registered Feed Advisors) who may already have contact with a vet responsible for the livestock unit should contact that individual / practice and make them aware of the concern and ask them to follow it up in their professional capacity.

In this event, to inform the AB Agri Risk Manager and the relevant Commercial Manager of the non-compliance before taking any action.

If the responsible vet is not known, please see section 2.2.2 (below).

2.2.2 Other Employees

Other employees should contact their Line Manager to report the non-compliance. The Line Manager will then report this directly to the AB Agri Risk Manager

The AB Agri Risk Manager maintains a log of all non-compliances using the AB Agri Accident & Incident Management System (AB AIMS). These non-compliances are assigned for action to the designated lead for each of the Agri businesses, and the respective Commercial and Technical Managers notified.

The number of non-compliances is reported as a metric, with analysis conducted to ascertain any trends in the non-compliances raised. These trends are used to identify improvements within the business, as well as potential support areas for customers.

2.3 Assurance

The Group recognises that a number of third parties have created schemes through which animal welfare can be assured, and operates in accordance with the requirements of these schemes where relevant and practicable.

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- 2.3.1 In the UK Red Tractor Assurance is an independent scheme that produces minimum standards that seek to guarantee that any food coming from farms and food companies meet its animal welfare, health, food safety and environmental protection standards.
- 2.3.2 The Group will operate in accordance with the requirements of local and international assurance schemes where relevant and practicable.

2.4 Legal Requirements

2.4.1 Food producing animals

In the UK, farm animals and their welfare are included under the Animal Welfare Act 2006 and, more specifically, the Welfare of Farmed Animals (England) Regulations 2007.

The Animal Welfare Act 2006 makes owners and keepers responsible for ensuring that the welfare needs of their animals are met.

These include the need:

- for a suitable environment (place to live)
- for a suitable diet
- to exhibit normal behaviour patterns
- to be housed with or apart from other animals (if applicable)
- to be protected from pain, suffering, injury and disease

The Act also contains a duty of care to animals. Anyone responsible for an animal must take reasonable steps to make sure the animal's needs are met. This means that a person has to look after an animal's welfare as well as ensure that it does not suffer.

The Welfare of Farmed Animals (England) Regulations 2007 brings together and modernises existing animal welfare legislation relating to farmed and non-farmed animals. Welfare codes have been created for most animals that are farmed commercially in the UK. These can be downloaded from the DEFRA website (see link in 4.1 Welfare Standards).

2.4.2 Companion animals

Pet and companion animal welfare is also governed by the Animal Welfare Act 2006 and the Pet Animal Act, 1951, supported by codes of practice.

AB Agri supplies nutrition to companion and equine animals according to the same principles of product formulation applied to livestock nutrition. AB Agri does not have direct contact with companion animals but supports legislation which protects companion animal welfare.

2.4.3 International

The Group's overseas Operations will comply with all relevant local and international regulations.

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3. Leadership and Innovation

3.1 Avoiding Antibiotics

We endorse a 'one health' approach to tackling antimicrobial resistance (AMR) as proposed by the European Commission in 2017. It is only by working across national and sector boundaries that we can share ideas, build consensus and make progress.

It is recognised that any nutritional deficiencies/imbalances during the life-cycle stages of any animal can impair the animal health status, thus raising its sensitivity and vulnerability to pathogens.

The Group invests significantly in research and development to ensure it is at the cutting edge of nutrition and production technologies, so that feeding and product recommendations optimise performance and minimise the risk of poor health and the need for antibiotics.

We are not proponents of 'antibiotic-free' production which we believe is impossible without welfare or mortality implications.

However, antibiotics should never be routinely used and the Group does not use or incorporate doses of antibiotics as a growth promoting substance. Additionally, the group does not use or incorporate growth promoting substances such as, sex or growth hormones, Beta-agonists or any stimulatory compounds, into any of our products.

3.2 Working with Third Parties

The Group uses its knowledge and experience in practical nutrition to assist and guide the authorities (i.e. UK and EU feed industry / Chinese Government) in best practice, e.g. in protecting animal and human health.

The Group encourages, supports and, where possible, will influence customers, suppliers, partners and other appropriate external stakeholders to do the same, where relevant.

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4. Further Information

4.1 Animal Health & Welfare Standards

Animal Welfare Act

http://www.legislation.gov.uk/ukpga/2006/45/contents

Welfare of Farmed Animals (England) Regulations

http://www.legislation.gov.uk/uksi/2007/2078/contents/made

Red Tractor Farm Standards

https://assurance.redtractor.org.uk/standards

Red Tractor Chicken Catching & Transport Standards

https://assurance.redtractor.org.uk/contentfiles/Farmers-6830.pdf? =636377904648406864

World Organisation for Animal Health (OIE) Animal Health Codes or the Farm Animal Welfare

http://www.oie.int/animal-welfare/animal-welfare-key-themes/

Equine Welfare Guidelines

 $\underline{https://www.gov.uk/government/publications/code-of-practice-for-the-welfare-of-horses-ponies-donkeys-and-their-hybrids}$

Animal Welfare Codes

https://www.gov.uk/guidance/farm-animals-looking-after-their-welfare

More information regarding minimum standards and principles expected of suppliers, please see the ABF Supplier Code of Conduct.

http://www.abf.co.uk/responsibility

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