



DOC REF: ESG002

The Compleat Food Group UK Soy Manifesto Progress Report 2024 (for reporting year 2023)

Introduction to our Soy Policy & Commitments

The mass production of soy causes environmental and social sustainability issues. Soybeans are produced predominantly in South America, North America, Europe and Asia.

Soy production can have a detrimental impact on important biomes such as the Amazon, Cerrado and the Gran Chaco regions; which we would like to protect from deforestation and conversion through land use change. Our policy at The Compleat Food Group (Compleat) is to achieve 100% sustainability of soy sourced from any origin.

Compleat continues to work with our customers & suppliers to support the sourcing of sustainable soy by ensuring all soy entering our supply chains is deforestation and conversion free as soon as possible, and by 2025 at the latest.

To deliver this commitment we have an action plan that will support our transition through to physically segregated, sustainable soy by moving any soy in our supply chain to mass balance certification and if that is not available then purchasing soy credits. Our ultimate aim is to move to verified deforestation and conversion free (vDCF) soy.

We are active members of the UK Soy Manifesto & are grateful for their support to facilitate the sourcing changes in our business and supply chains.

The scope of this report focuses on products (own label) supplied to UK retail & Food Service, Compleat does not use any soy as a direct ingredient in any of these products. All of the soy within our footprint is currently embedded in the raw materials we purchase.

Our soy footprint is primarily determined by the use of soy as an ingredient in animal feed, this consists of feed used in the production of cattle, lamb, pork, poultry, eggs and dairy (milk & cheese).

About The Compleat Food Group.

Compleat is one of the fastest growing Chilled Food businesses in the UK whose mission is to create quality, tasty and affordable food, that people love to eat. Compleat manufactures and supplies products to UK retailer and food service in three main categories: Pastry, Deli and Plant Based.

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In February 2024 Compleat acquired SK Chilled Foods in Middlesbrough and Zorba Delicacies in Ebba Vale so now has 12 manufacturing locations in the UK and works with over ninety production partners across Europe. For the purposes of this 2024 progress report, we are excluding our new Middlesbrough and Ebba Vale sites from our reporting but they will be included in our 2025 report for our 2024 volumes.

Compleat is a leading UK supplier in the pastry category, from meal centres (hot pie, slice or quiche); to snacking & lunchbox (pork pie, Scotch egg or sausage roll); bread (panini & bread rolls); deserts and sweet treats (cookies, donuts and tarts), fried snacking (onion bhajis, pakoras and samosas) all made in our UK bakeries.

Compleat is the UK's #1 supplier in the "Deli" category composing of olives, antipasti, dips, continental meats, and Mediterranean inspired cuisine.

Compleat manufactures and supplies market leading plant-based alternatives with our brand Squeaky Bean along with the UK's leading Pickle and Ferments brand Vadasz. Our newest brand is Palace Culture which launched three vegan cheese products in November 2023.

1) Compleat Soy Policy

The TCFG Soy policy is publicly available and is published on our website here: [Our Impact Policies · Compleat Food Group](#).

Further information on our sustainability work can also be found on our website as part of our "Food to Feel Good ESG Impact Strategy" here: [Our Impact · Compleat Food Group](#)

2) 2024 Report Headlines.

This is our second UK Soy Manifesto Progress Report, and it is fair to say that the landscape is still challenging, and progress is slow. However, we remain committed to our 2025 targets along with our customers and suppliers.

In 2023, Compleat used a total of 25,187 tonnes of soy across our manufacturing and supply network for our retail customers who require us to report to 3Keel. As per our recent RTRS members report [The-Compleat-Food-Group Annual-Report-2023-Industry-Trade-Finance-.pdf \(responsiblesoy.org\)](#) this is not our entire soy footprint. We are working on improving our data quality and aim to have a full footprint for our 2024 reporting.

The soy used in animal feed was supplied by Cargill, ADM, Bunge, Cereal Docks, Dreyfus, Cofco and others.

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The origin of the soy used in the animal feed originated from North and South America (USA, Canada, Paraguay, Argentina, and Brazil) and from Ukraine, Europe.

3) 2023 Soy Footprint Calculation

Compleat works with the Sustainability advisors 3Keel ([3Keel – Sustainability advisors](#)) to calculate our total soy usage.

This is a complicated process and employs differing 3Keel conversion factors depending on country, scheme, and end use. However, the final figures are cross referenced to ensure complete accuracy and transparency. We continue to improve this process annually and once our new ERP system goes live in 2024, we expect this to improve further.

For our 2023 soy footprint, Compleat worked directly with 3Keel to engage with 50 of our most material suppliers for embedded soy. This involved direct questionnaires to our suppliers and as such improved the level of detail we had on our soy footprint.

As a result, Cranswick, who are one of our key pork suppliers, purchased RTRS regional mass balance credits to cover their entire soy footprint in 2023. As a result, this meant that the number of soy credits Compleat needed to purchase in 2024 was 19,874.

4) Purchase of RTRS Regional Soy Credits

In early 2024, Compleat purchased 20,000 RTRS soy incentives (RTRS credits) via their impact facilitator partner and fellow RTRS member, Achieve Now, for Compleat's 2023 soy footprint. These incentives named RTRS Regional credits, were procured from two farms in the MATOPIBA region, Brazil. One is located in the Piaui state and the other producer is located in the Maranhao state in Brazil.

By focusing on specific critical regions in Brazil such as the ecological area of the MATOPIBA region, part of the Cerrado biome, Compleat will increase the demand in these regions for certified deforestation and conversion-free production. This could lead to a more certified supply of responsible soy which will help create a critical mass of deforestation and conversion free soy for physical uptake by the industry in the upcoming years.

We will continue to work closely with our impact facilitator and other partners to support the soy producers in the MATOPIBA region of Brazil. We believe that credits will continue to play an important role in sustainable soy, not just on deforestation but broader topics such as land use, water use and biodiversity. As a member of RTRS, we continue to work closely to understand the longer-term role of credits and how Compleat can support farmers and smallholders.

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The credits we purchased cover our 2023 soy footprint for Compleat that isn't already covered by our suppliers or is already vDCF.

5) Progress report towards sustainable soy in 2023.

Compleat's Soy policy was relaunched in 2022 and has been deployed across all direct and indirect manufacturing locations in the UK and Europe. We continue to share the policy with new suppliers.

The soy policy has been received by 100% of all our protein suppliers in UK and Europe.

Compleat has developed a Self-Audit Questionnaire (SAQ) to track implementation of the Soy policy and our UK retail supply requirements.

The SAQ is requested to be cascaded down the supply chain from manufacturer to raw material supplier, to cutting plant, abattoir and corresponding animal feed suppliers.

From the feed suppliers we can link to the feed mill and therefore the importers of the components of the feed. From this point we can ascertain the origin of the soy and sustainability status (give examples of soy).

The SAQ requires each element of supply chain to agree with our Soy policy and commit to our sustainability sourcing timeline.

At Compleat we have industry leading supply chain transparency, and we have our bespoke supply chain management tool with Authenticate IS ([Supply Chain Transparency & Management Software | Authenticate \(authenticateis.com\)](https://authenticateis.com))

We use our database to map our complex supply chains back to each individual farm or growers, deploy SAQ's, conduct audits and assessments, plus capture a myriad of data and KPI metrics.

6) The Impact of the European Union Deforestation Regulation (EUDR) & UK Forest Risk Commodities (FRC) Legislation.

At Compleat we are acutely aware of the new EUDR regulations that come into force in Europe at the end of 2024. This groundbreaking piece of legislation aims to tackle deforestation across various commodities including soy. The requirements to be able trace all shipments of soy back to geo-locations and to show proof of land ownership are positive steps towards achieving sustainable soy. EUDR will improve the sustainability of soy coming into Europe, but it will not achieve all the aims of the UK Soy Manifesto, particularly the conversion element.

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As the UK is no longer part of Europe, the UK Government is also working towards its own piece of Forest Risk Commodities legislation. In spirit it is aligned to EUDR, but it will have very different requirements on UK companies like Compleat. EUDR does not directly apply to Compleat as we do not have a European entity, however UK FRC will apply.

We continue to be active participants in the UK Soy Manifesto and are working closely with DEFRA, our customers, and suppliers to understand the implications of EUDR and UK FRC on Compleat and our supply chain.

7) 2023 metrics on Sustainable Soy in our supply chains.

Compleat’s footprint for 2023 continues to be a mix of low-risk soy, DCF soy, vDCF soy and certified sustainable soy. However, like in 2022 we cannot confirm amounts/percentages in each delivery of soy or feed mill mixing. To achieve our overall footprint, we subtract any soy already covered by our suppliers (e.g. Cranswick) and class all remaining soy as high risk and as a result purchase credits.

8) 2023 Summary

Significant progress has been made in 2023 to deliver on our responsible sourcing commitments. From the group’s formation in 2021, we have launched our “Food to Feel Good ESG Impact Strategy” which includes our soy sourcing commitments and policy.

We continue to cascade our responsible sourcing (soy) SAQ down our supply chains to enable a real time assessment of the current status and implementation of actions for 2023 & 2024 as we move to reach our 2025 commitment.

As a result, some of our key suppliers have moved to RTRS regional mass balance and we even have a small amount of vDCF in our supply chain. There is a lot more action needed within our supply chain, so we look forward to working with our partners, customers, and NGOs to drive towards our 2025 commitments.

We would like to thank UK Soy Manifesto (Efeca), 3Keel, and our supply partners across our network for their continued help and support.

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