Deforestation Policy

Introduction

UNFI believes it is important to protect the world's forests and natural ecosystems. UNFI's policy is designed to support a commitment to no deforestation across its primary deforestation-linked commodities by 2025, with a cutoff date of 2020. This policy applies to UNFI's owned branded and purchased goods. UNFI's primary deforestation linked-commodities are defined as beef and palm.

UNFI references the Accountability Framework's definition of deforestation as the loss of natural forest, legally or illegally, as a result of: conversion to agriculture or other non-forest land use; conversion to a plantation; or severe and sustained degradation.

We believe that the first step towards no deforestation is improving traceability. UNFI's goal is to work with suppliers who do not participate in deforestation. UNFI expects suppliers to share the relevant sourcing information upon request to improve traceability into its supply chain and to facilitate progress against this commitment. UNFI encourages suppliers to set their own no deforestation commitments as well. UNFI commits to helping suppliers achieve these goals by sharing resources and connections through the <u>Climate Action Hub</u>.

UNFI will identify and monitor supplier compliance with the no-deforestation policy via supplier questionnaires and a formal grievance mechanism.

Policy on High-Risk Commodities

Beef

UNFI will no longer purchase beef originating from Central or South America from a source engaged in legal or illegal deforestation, effective immediately, and will encourage its suppliers to shift away from this practice. UNFI will require its beef suppliers to provide an affidavit certifying that beef sold to UNFI does not originate from companies engaged in legal or illegal deforestation. For suppliers located in Central or South America, UNFI will require affidavits and encourage its suppliers to pursue third-party verification that they do not engage in legal or illegal deforestation.

Palm

UNFI is a member of the Roundtable on Sustainable Palm Oil (RSPO). Any new product in UNFI's owned brands portfolio that contains palm oil must use certified sustainable palm oil. UNFI has committed that its owned brands will use 100% RSPO palm oil by 2025.

We strongly encourage our suppliers to pursue certification of any palm oil they use, and to make a commitment to use only sustainably sourced palm. We will use the Climate Action Hub to distribute resources and best practices to our suppliers, which may include webinars and roundtable discussions to help our suppliers understand the certification process. We will also connect them to reputable third-party certifiers such as RSPO, Rainforest Alliance, and Palm Done Right.

As we learn more, both through our own findings and the advancements of the scientific community, we will continue to update and advance our work to eliminate deforestation-linked palm oil in our supply chain.

This policy is subject to regular review to reflect the latest scientific information, market maturity, and stakeholder expectations. UNFI's commitments regarding deforestation-free beef and palm oil are subject to feasibility that may be impacted by availability, changes in economic or macro environment, or other factors beyond UNFI's control. The day-to-day implementation of this policy will be the shared responsibility of Supplier Services, Meat Department, and ESG Team. The ESG team will also be responsible for monitoring and reporting on progress.

This policy is overseen by the Nominating and Governance Committee of UNFI's Board of Directors. Any amendments to this policy must be approved by the Nominating and Governance Committee. The Policy was initially approved on [May 31, 2023].

Other Actions

In addition to the steps outlined above, UNFI intends to take the following actions to work towards a deforestation free supply chain:

- Encouraging its suppliers to evaluate high-risk commodities in their supply chains and seek relevant certifications where applicable.
- Working to establish a baseline and improve tracking of palm oil in our portfolio. We plan to
 work with third-party organizations and industry groups to improve data quality and to better
 understand our highest risk products. We also plan to directly connect with our suppliers to
 assess existing products and to help address barriers to converting to sustainable palm.
- Joining industry working groups including the Roundtable for Sustainable Palm Oil and the Consumer Goods Forum to learn and share best practices while leveraging our scale to maximize impact.
- Promoting all direct suppliers' compliance with this policy through integration into Supplier Code of Conduct. We will also be annually surveying selected suppliers of high-risk commodities to assess progress.

Progress on this commitment is expected to be published and made publicly available on an annual basis through UNFI's Better for All Report, CDP Forests disclosure, and Annual Communication on Progress Report of its RSPO membership, as applicable. Failures to meet targets and milestones will also be published.