

Fuji Oil Europe Statement on Deforestation-Free Products

Aug 2026

Fuji Oil Europe acknowledges the EU Deforestation Regulation (Regulation (EU) 2023/1115) and its objective of promoting deforestation-free supply chains. In line with Fuji Oil Group's broader responsible sourcing commitments, Fuji Oil Europe addresses deforestation in its supply chain through responsible sourcing policies, including those for palm oil and cocoa. These broader commitments include halting deforestation, no development on peatlands for palm oil, progressive reduction of greenhouse gas emissions, respect for human rights, and compliance with applicable local laws and regulations.

FOE has established the necessary due diligence processes, supplier engagement activities, traceability systems and governance measures to support compliance with the EUDR.

In preparation for the application of the EUDR, FOE has already been testing data flows and systems internally and is preparing to fulfil its obligations regarding DDS reference numbers and verification numbers upon application of the EUDR. The information shared with customers will depend on FOE's role under the EUDR and the classification of the relevant products.

Aligned with Fuji Oil Group Policies and Strategy

Engagement with relevant stakeholders is crucial. As Fuji Oil Europe is positioned in the middle of the supply chain of palm oil and cocoa, we actively seek the awareness and cooperation of our suppliers regarding the social and environmental impacts of their operations. Our Supplier Code of Conduct, introduced in 2021, requires suppliers to comply with Fuji Oil Group's principles on responsible business conduct, including human rights and environmental protection.

We also participate in industry associations like the European Cocoa Association, the World Cocoa Foundation, Liprobel and Fediol, to respond to global trends in due diligence and legislation.

FOE is committed to meeting the applicable requirements of the EUDR and has implemented the necessary processes to support compliance.

Fuji Oil Europe's actions on deforestation-free supply chains

- A. Operational Compliance**
- B. Stakeholder Engagement and Supplier Risk Assessment**
- C. Grievance**
- D. Governance**

A. Operational Compliance

Raw Materials where FOE acts as the First Operator

- FOE requires suppliers to provide the necessary traceability information for relevant raw materials.
- Potential sourcing mills are reviewed in advance by our satellite monitoring partner based on the agreed mill list. Most of the initial screening has already been completed, with the remaining analysis ongoing.
- Nearly 100% of the palm oil purchased by Fuji Oil Europe is already RSPO SG certified. Some requirements relevant to EUDR compliance are therefore already covered by the RSPO certification scheme. With the help of a satellite monitoring system, FOE addresses the gap between RSPO SG certification and EUDR requirements.
- FOE will upload the required data to the EUDR Information System to obtain Due Diligence Statement (DDS) reference numbers and verification numbers every three months.
- During manufacturing, products will remain traceable throughout the production process.
- For relevant products supplied to customers, the corresponding raw material DDS reference and verification numbers will be provided on the delivery note and invoice.
- When FOE acts as the first downstream operator for a relevant product, the corresponding DDS information will be retained in FOE's internal system and will not be passed on to customers.

Raw Materials where FOE acts as a Downstream Operator

- Fuji Oil Europe sources cocoa ingredients from European suppliers. Although FOE does not purchase cocoa beans directly at origin, we engage with our suppliers on traceability and deforestation-related risks in their cocoa supply chains. FOE has assessed its cocoa suppliers and sources from suppliers classified as low risk. Our cocoa products may also be certified under FAIRTRADE or Rainforest Alliance schemes.
- When FOE acts as a downstream operator for these products, raw material DDS information will not be passed on to customers.

B. Stakeholder Engagement and Supplier Risk Assessment

We believe that no-deforestation must be addressed along with the well-being of workers, local communities and smallholders. To do so, Fuji Oil participates in landscape initiatives in Malaysia and Indonesia together with suppliers, local communities, smallholders, local governments and experts.

FOE has been communicating with all its suppliers to request their cooperation and evaluate their capability to comply with our requirements. Suppliers that supply products that are subject to EUDR but not able to align with EUDR's obligations will be discontinued.

FOE assesses the maturity of suppliers through self-assessment questionnaires, grievance records, and any other relevant information. This assessment results in a ranking of suppliers. Suppliers with a low risk will be preferred, while suppliers with a high risk will be avoided.

FOE will periodically monitor suppliers' activities in relation to the EUDR and verify that the information received from the suppliers is correct. This includes, but is not limited to, satellite monitoring, visits to plantations, mills and refineries, and verification of polygon data correspondence to plantations and farms (randomly and/or in the event of reasonable doubt).

C. Grievance

Since 2020 FOE monitors palm oil sources in our supply chain through satellite image. Today 100% of Fuji Oil Europe's palm oil raw materials are covered by continuous satellite monitoring. Suspected deforestation detected by the satellite system or denounced by a third party, enters the Fuji Oil Group's Grievance Mechanism. Confirmed deforestation incidents follow the Suspend and Engage Protocol, upon which direct or indirect suppliers are temporary suspended, until they meet the minimum requirements specified in Fuji Oil's Grievance Mechanism.

A description of the mechanism, and list of grievances is publicly available at https://www.fujioilholdings.com/en/sustainability/grievance_mechanism/.

D. Governance

Fuji Oil Group has been monitoring this legislation since its first draft. Several departments are involved in generating the necessary information to comply with EUDR.

FOE has appointed a Sustainability Compliance Controller who will coordinate that all actors within the entire Fuji Oil Group will act in a coordinated fashion so as to achieve the compliance of EUDR.



Data Sharing

The EU Information System aims to provide customers with DDS numbers as well as Verification numbers, which ensure that we have conducted the due diligence required by EUDR legislation.

Regarding polygon data, FOE collaborates with satellite monitoring experts to ensure that all plantations within our production chain have remained deforestation-free since the cut-off date specified by the EUDR regulations. Due to confidentiality agreements, we are unable to provide specific geolocation plantation information for individual deliveries upon customer request.

As for traceability, FOE receives detailed traceability documentation from our suppliers, and all products certified under RSPO SG are rigorously audited for traceability. Due to legal constraints in the countries of production and confidentiality agreements with our suppliers, FOE can only provide customers with basic traceability information up to the mill level, without disclosing the identity of the seller.

Ensuring Compliance with EUDR

With the activities above, we are on track to fulfil the EUDR. To ensure compliance, our Sustainable Development Team in Europe is working with different stakeholders and through different channels to set up a deforestation due diligence system for palm oil, in line with the requirements stipulated by the EUDR.

Rest assured that Fuji Oil Europe will take the necessary steps to be compliant with the EUDR.

Visit <https://www.fujioileurope.com/en/sustainability> for more information.

This document does not contain any advice and it should not be used as an official interpretation of the above-mentioned regulation. This statement only includes some of the actions and steps of Fuji Oil Europe taken to ensure its legal compliance.

Should you need any further information, please do not hesitate to contact us.

Yours Sincerely
Jon van den Bremen

Managing Director - Fuji Oil Europe | Kuhlmannlaan 36 | 9042 Ghent, Belgium
T +32 (0) 9 341 77 83 | M +32 (0) 470 88 07 38
www.fujioileurope.com | jon.vandenbremen@fujioileurope.com

