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Sustainability report 2020

Luiten Food



Table of contents

3	A word from the board
4	Our Company
5	Our Operations
6	Our Added-value
7	Our Reach in Europe
8	Our People
9	Our responsibility in the supply chain
10	Our Stakeholders
11	Our Material topics
12	Our Quantitative performance
13	Our Energy consumption
14	Our Transport stats
15	Quality management, animal welfare, and traceability
16-24	Additional information



A word from the board

It is almost impossible to have a conversation about 2020 without talking about COVID-19 and the way it has influenced us at Luiten Food. I think it is safe to say that 2020 has not been the year we expected it to be. Like many other companies, we expected 2020 to be a year of stability and growth. However, March 2020 brought uncertainties and challenges which required flexibility from everyone in the company. I am extremely proud if I look back on the barriers we have overcome and the positivity we have carried through the year despite everything that has been going on.

During the pandemic, we benefited from the market position we built up in retail during the past years. While the foodservice segment saw a dip at the start of the pandemic, the retail segment has seen unexpected growth due to the increased demand of customers for our meat products. Our ability to scale up our production, labeling, and packaging activities has ensured that we were somewhat able to keep the company running at normal capacity.

The peak season in Q4 has even been busier than ever.

On the sustainability side, we have also put in the work. Getting certified for the CSR performance ladder has pushed us to implement and carry out a CSR policy. Although we still feel like we are in the early stages of development we are starting to get a clear vision of where we want to be in 10 years. One example of this is to make our building and own transportation fleet carbon neutral by 2030. The first step has been made by further investing in solar energy by increasing our solar panel fleet from 786 panels to 1750 panels. We expect our solar panels to deliver enough energy on summer days to completely power the whole facility. At the end of 2021, we will be able to measure the actual impact of this project and will decide which further steps to take in order to reduce our carbon footprint on the world.

To look forward to 2021, I hope that Luiten Food can carry the positive trends into 2021 and beyond. From our recent materiality survey conducted in 2021, we have concluded that food safety and quality management are of the utmost importance to our stakeholders and will, of course, remain our main priority. We will also try to find ways to further enhance the traceability of our products.

'I am extremely proud if I look back on the barriers we have overcome'

- Lennert Luiten (Managing Director)



Our company

Luiten Food has been active in the trade of game and poultry since 1938. In its current form, the company has grown into one of the biggest European players in the import of beef, lamb, game, poultry, Iberico, fish & seafood. Luiten Food is proud to be the supplier of various companies active in food service, food processing, wholesale, catering, retail, and specialty stores.

The Luiten Food team has been working together for years and attaches great importance to the personal contact with its customers and suppliers. Therefore, loyalty and trust are among the key principles. This ensures high-quality products and a good relationship with customers.

Luiten Food is a modern and professional company. Outstanding quality control and service are our main priority. The customer can be assured that we will do everything in our power to tailor a custom solution for every request. We try to find a solution for every technological issue and are happy to take on any challenge for product and chain optimization or innovation. Service and flexibility are of paramount importance at Luiten Food.

Luiten Food recognizes the rising importance of corporate social responsibility. Based on a sense of social commitment and a clear vision, we are constantly looking for the perfect balance between social, environmental, and economic interests. By doing this, we do everything in our power to take care of people and the environment, in the short-, but also the long term. Our CSR policy is divided into social (people), environmental (planet), and economic (profit) aspects. The overview of the policy can be found in the policy section of this document.

In a bid to give direction to our corporate social responsibility, Luiten Food uses the ISO 26000 standard as guidance. To measure its performance, Luiten Food is audited yearly against the “MVO prestatieladder” (Literal translation: CSR performance ladder). This certification is the ideal way to push the company forward in the field of sustainability as the main drive behind the standard is ‘continuous improvement’.

About us

- Over 80 years of experience.
- Modern and professional.
- Remarkable quality standard
- Exclusive meat products from all over the world.
- Serving a wide variety of customers.
- Striving for carbon neutrality by 2030

Location:
Stompwijk, The Netherlands



Our operations

Cold Storage

- 7000 Pallet places
- Chilled
- Frozen

Production facilities

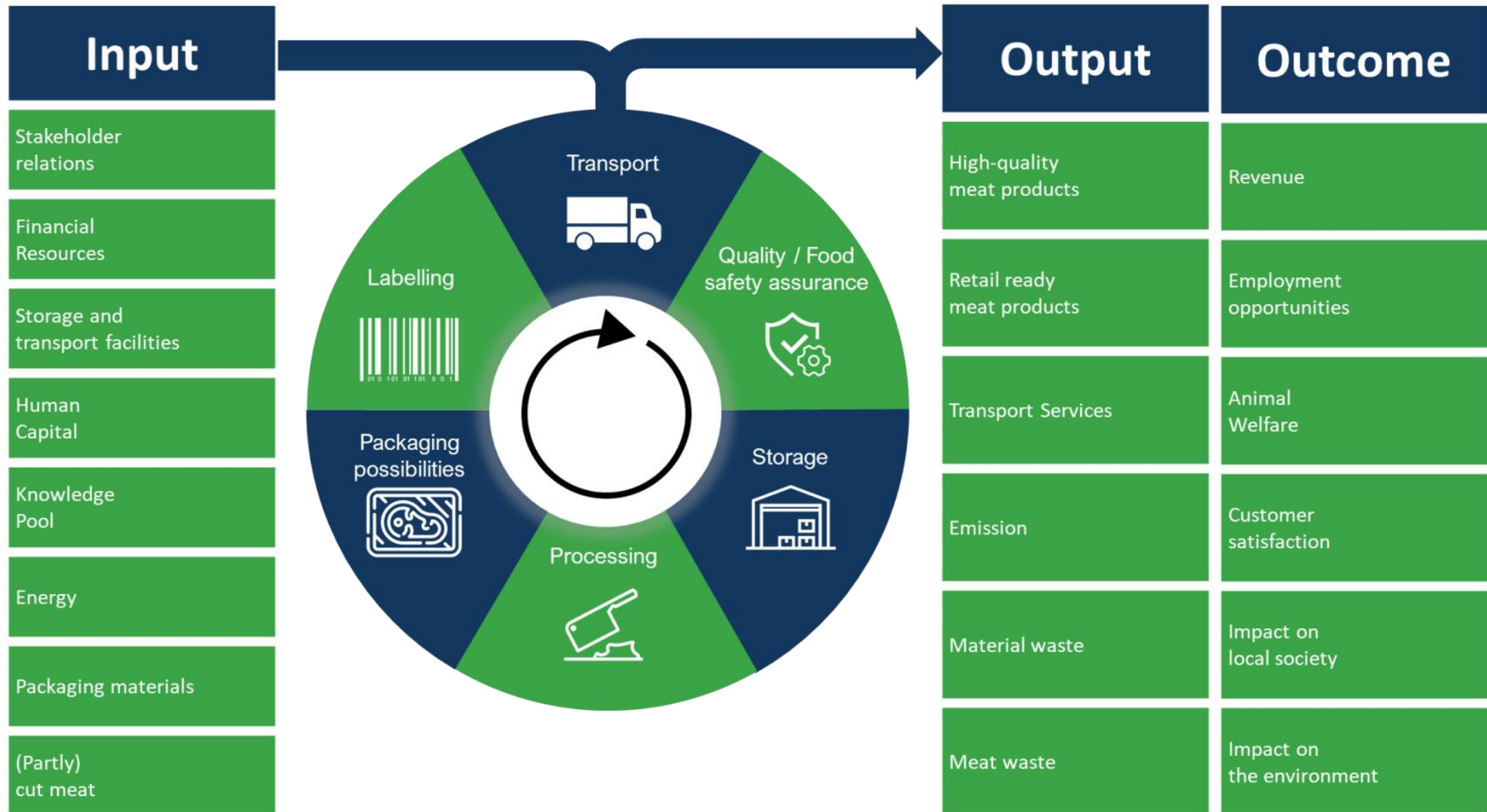
- Packaging
- 2D labelling
- QR labelling
- Cutting room

Transportation

- Delivery within 24 hours in Northern/Western Europe
- Mixed pallets



Our added-value



Our reach in Europe

2020: 4.88%

2019: 5.36%

2018: 6.15%

**Nordic
Region**



2020: 14.5%

2019: 10.8%

2018: 8.2%

United Kingdom



2020: 14.4%

2019: 13.3%

2018: 14.6%

Germany

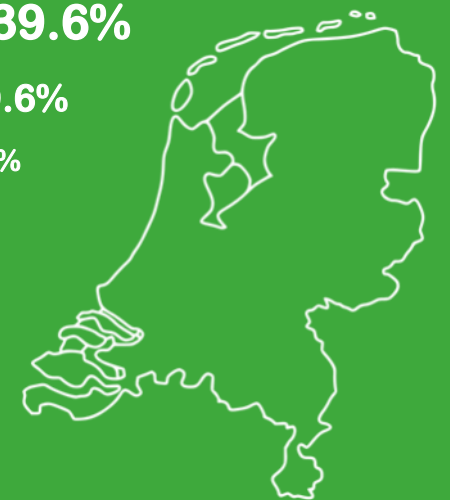


2020: 39.6%

2019: 39.6%

2018: 48.9%

The Netherlands



2020: 4.75%

2019: 3.79%

2018: 0.48%

Switzerland



2020: 9.73%

2019: 11.6%

2018: 10.3%

Belgium



Markets served: 34

The Netherlands remains our biggest market segment by a large margin. Its percentual decrease is caused by accelerated growth in other markets like the UK and Switzerland



1.7%

Illness
percentage:

Fulltime:

42

Parttime:

9

Total number of employees
by employment type:

77 employees

7 more than 2019

(This number includes full-
timers, part-timers and on-
call workers.)

Total number of employees.

94,25%

% with
permanent
contract:

Female:

21.84%



Male:

78.16%



Total number of employees by gender:

Our people

COVID-19

The biggest point on our agenda in 2020 was, of course, employee safety with regards to the coronavirus. As most of our operations require our employees to work on-site, it was of the utmost importance to tighten health and safety measures to reduce the spread of the virus. Examples of these measures are enhanced cleaning, social distancing, and providing adequate equipment like masks and testing possibilities.

Training

In 2020 all employees have passed the yearly quality and hygiene training. The quality training was meant to enlarge the knowledge of all employees about the added benefits of BLK, MSC, ASC, and IFS certificates and the actions that come with maintaining them. In this way, Luiten Food ensures that all its employees are able to act in accordance with the certification standards. The hygiene training ensures all employees are familiar with hygiene procedures in the production process, even if they visit the production halls very irregularly. All employees have also finished basic sustainability training to give everyone in the company a basic understanding of the topic. In this way, we hope to improve both the food safety and sustainability culture within Luiten Food.

Looking forward:

Luiten Food is growing. In 2021 we have hired 10 new colleagues across the whole company. In 2021 the total number of employees is expected to grow because of further company-wide growth. Also, the pool of temporary workers from employment agencies is increasing due to a growth in retail production.

Because of this growth, Luiten Food is taking steps to set up a works council to represent the growing pool of employees in the best way possible.

Our responsibility in the supply chain

Our role in the supply chain

Luiten Food, in essence, is a distribution company that focuses on the import, storage, processing, marketing, and transporting chilled and frozen meat products from all over the world. During the last few years, Luiten Food has focused on expanding its plant to facilitate the growing demand for our production facilities. Our cutting, packaging, and, labeling facilities have been expanded to provide the customer with an extensive range of possibilities with regards to the preparation of their meat products.

Our extensive partnership with Thomas Foods international from Australia extends our control over the supply chain even further. The shared vision between Luiten Food and Thomas Foods ensures that food safety, employee wellbeing, and animal welfare are controlled within the biggest portion of the supply chain. In this way, the customer is ensured of an ethical and high-quality product.

Traceability: Increasing food safety and reducing food fraud.

Luiten Food prioritizes traceability for all of its products. Within society, the call for transparency within the meat industry is becoming louder. Therefore, Luiten Food has made sure that all of its products are traceable back to their origin. This is a trend within the industry that a lot of other companies also follow. Within the next years, we expect blockchain technology to become increasingly important for sector-wide traceability. We are actively looking for options to implement this technology since blockchain has been proven to reduce food fraud. It furthermore increases food safety because of quicker recalls in case of contamination or other safety hazards.



Our Stakeholders

We see our stakeholders in the broadest sense of the word as a crucial part of the organization. Stakeholders are selected and assessed on their power on, and interest in Luiten Food. The influence of stakeholders differs and the interest they have in Luiten Food is not always equal. By making a distinction here, we hope to gain insight into how we should approach and/or involve the various stakeholders.

In addition, some stakeholder groups are monitored to a further extent for various reasons. For example, suppliers are assessed on the professionalism and origin of products and/or services to exclude any corruption or malpractice. In this way, we provide insight into whether its stakeholders are already engaged in socially responsible practices.

Materiality Survey

To allow stakeholders to voice their opinion about our CSR themes and general policy we will send out a questionnaire in 2021. By doing this, we can give better direction to our material themes and formulate better targets for the future. Next year the results will be published in the report.

Management	Certification institutions
Employees of Luiten Food	NGOs
Foodservice customers	Retail customers
Employment agencies	Residents in the vicinity
Suppliers of meats	Shareholders
Competitors	National and European government
Bank	Suppliers of misc. services
Municipality	Branch organisation

Our Material topics

In 2020 we started implementing the CSR performance ladder. Providing 31 standard themes, the performance ladder states that in order to exclude a theme, Luiten Food should do an extensive inquiry among its stakeholders. Due to the inexperience and short notice, a very limited inquiry was held which resulted in an inability to lower the priority of a lot of themes.

Our vision on sustainability is to monitor a wide variety of themes that have no direct priority or are not deemed important enough by stakeholders to be a material topic. Only a few topics should be important enough to be material topics. On these few topics, Luiten Food should formulate a thorough and well-structured plan to improve on that specific theme.

Looking forward

Due to the lack of stakeholder input in 2020, we have a large number of material topics. This makes focusing on a select few themes difficult and reduces the impact we can make on those topics. Therefore we have decided to execute a materiality survey in 2021 to select the most important themes on which we can formulate goals and a long-term vision. We expect the next report to be more clear on which topics are of the utmost importance to us and why we chose to highlight a certain topic over another. We furthermore are looking into linking these material topics to the Sustainable Development Goals.

Organisational governance	Employment
Relationship between employer and employee	Health and Safety
Diversity and opportunities	Strategy and policy
Equal treatment	Child labour
Forced and compulsory labour	Corruption
Consumer health and safety	Product information
Consumer privacy	Raw materials
Energy	Emissions, waste water and residual waste
Transport	Direct economic values that are generated and distributed
Contribution to the economic system	Animal welfare

Our quantitative performance

Despite the COVID-19 situation, 2020 was a profitable year for Luiten Food mainly because of a higher gross margin on our products. Our quantity of products sold is roughly at the same level as 2018. This decrease can be attributed to the closure of many food services in the catering sector all over Europe. Our increased position in the retail industry ensured a somewhat stable revenue.

The renovations and expansion of our facility resulted in a six-fold increase in long-term debt compared to 2018. However, the debt-equity ratio is still in line with the industry average. The quantitative results show that Luiten Food is healthy and able to pay off its debts at the moment it should. Furthermore, the healthy financials combined with our CSR performance also opens up more investment opportunities.

	2018	2019	2020
Net sales (revenue)	€104.376.590	€119.587.068	€107.464.319
Quantity of products sold	13 kiloton	15 kiloton	13 kiloton
Profit before taxes	€4.019.357	€2.041.982	€3.086.339
Total Equity	€9.830.820	€12.849.493	€10.513.700
Total Debt (long-term)	€589.926	€3.184.210	€3.586.072
Debt/Equity ratio	28	23	26



Our energy consumption

In 2020 we have seen an increase in our overall energy consumption of roughly 200,000 kWh. The expansion of our energy consumption can be mainly explained by the increased use of our production and labeling facilities. Also, the expansion of storage facilities at the end of 2019 has resulted in an increase of our energy consumption. In these facilities, new machines have been installed to meet the increasing demand for our retail services. Furthermore, increased the increasing volumes have resulted in increased utilization of these facilities.

The further expansion of our solar panels, completed in February 2021, is expected to further decrease our non-renewable energy consumption to levels of self-sustainability in the summer months. To put the expansion in contrast, the number of kWh hours produced in 2019⁽¹⁾ are now produced in March alone.



Total energy usage:

2020: 1,524,037 kWh

2019: 1,234,295 kWh

2018: 1,284,345 kWh



Solar energy production:

2020: 219,139 kWh

2019: 50,900 kWh ⁽¹⁾

2018: 0 kWh



Non-renewable energy usage:

2020: 1,304,898 kWh

2019: 1,183,395 kWh

2018: 1,284,345 kWh

(1) Solar panels operational since August

Our Transport stats

As can be seen on page 11, our total volumes have decreased due to the ongoing pandemic. Our amount of ton-kilometers has, however, not decreased to the same extent. Therefore, it is evident that we have driven more kilometers in 2020 when looking back at 2019. This is in accordance with the fact that a higher percentage of our sold products go to foreign countries compared to the last years. This explains the rise in CO₂ equivalents from 2019 to 2020. In the coming years, it becomes key that we partner with transport companies to drastically reduce this amount.

The fuel consumption of our own fleet has also increased due to increased utilization and expansion. It is key to monitor and consider innovations to decrease the emissions of our own fleet. Therefore, we expect our own fleet to be climate neutral by 2030 either through direct replacement or direct compensation by investing in CO₂ reduction elsewhere.



Total ton-kilometers driven to customers: ⁽¹⁾

2020: 6.316.819 ton-km

2019: 6.757.550 ton-km

Fuel consumption of own fleet:

2020: 55,262 Liters

2019: 37,377 Liters

CO₂ equivalents of transport per ton transport:

2020: 0.13 ton CO₂ per ton transport

2019: 0.12 ton CO₂ per ton transport

Quality management, animal welfare, and traceability

Working with perishable goods requires accurate control of all processes. We work with various quality standards and hygiene codes that contribute to the safe and reliable implementation of our operation.

The controlling starts at the source. First of all, we select our suppliers based on their performance and their quality system. We regularly visit our suppliers to physically control the processes. By keeping the inventory management and the logistic chain under our own control, our quality team is able to accurately monitor the transit of all goods. With our integrated logistics software, all products are 100% traceable.

Quality management systems:



Total number of audits in 2020:

15

Animal welfare systems:



Sustainability management system:



CSR
Performance Ladder

Additional Information



KPIs of other themes:

Theme	KPI	2019	2020
Organisational governance	Amount of adjustments to the CSR policy and compliance obligations	n.a. (CSR system not implemented yet in 2019)	n.a. (CSR system has been set up in 2020 therefore no major adjustments have taken place)
Relationship between employer and employee	Does every employee have a fitting and written labour contract?	No, on-call workers did not have a signed contract (only verbal contract).	To increase clarity, all new on-call workers receive a written contract.
Diversity and opportunities	Is the policy effective with regard to discrimination and equal opportunity? Amount of cases regarding discrimination.	The policy seems to be effective since there are no reported cases of discrimination.	The policy seems to be effective since there are no reported cases of discrimination. Furthermore, the complaint procedure via the external counsellor has been tested.
Forced and compulsory labour	Are there cases of compulsory or forced labour within Luiten Food? Are there cases of compulsory or forced labour within the supply chain?	No, by complying with Dutch law and only being operational there, there are no cases. Not that we are aware of. During company visits, no cases of forced labour were noted.	No, by complying with Dutch law and only being operational there, there are no cases. No cases have been reported. Due to COVID-19, company visits were not possible.
Consumer health and safety	Are there any food-safety-related problems that could not be adequately solved?	There have been food-safety-related issues of various sorts, but these have been solved accordingly. There have been no cases that directly endangered customers or could not be solved.	There have been food-safety-related issues of various sorts, but these have been solved accordingly. There have been no cases that directly endangered customers or could not be solved.
Consumer privacy	Have there been any data leaks within the reported year? If so, include a description of how this has been communicated / solved.	No data leak has been discovered. All information is treated in compliance with Dutch and European privacy laws.	No data leak has been discovered. All information is treated in compliance with Dutch and European privacy laws.

KPIs of other themes:

Theme	KPI	2019	2020
Strategy and policy	<p>Are there any violations of human rights by Luiten Food?</p> <p>Are there any violations of human rights in the supply chain?</p>	<p>No, upholding human rights is the number one priority because of our ethical standpoints. Furthermore, Dutch law creates a strong foundation for upholding human rights.</p> <p>Within the supply chain, no cases of violations have been reported. There were no evident cases during the company visits.</p>	<p>No, upholding human rights is the number one priority because of our ethical standpoints. Furthermore, Dutch law creates a strong foundation for upholding human rights.</p> <p>No cases of violations have been reported.</p>
Child labour	<p>Are there any cases of child labour within Luiten Food?</p> <p>Are there any cases of child labour in the supply chain?</p>	<p>No, both our policy and Dutch law prohibit the use of child labour.</p> <p>No cases have been reported. Also, during the company visits no cases have been reported.</p>	<p>No, both our policy and Dutch law prohibit the use of child labour.</p> <p>No cases have been reported.</p>
Corruption	<p>Are there any signs of corruption by top management or employees?</p> <p>Has the risk analysis been conducted to find any corruption risks?</p>	<p>No, there have been no signs of corruption within the company.</p> <p>Yes, no outstanding risks were found.</p>	<p>No, there have been no signs of corruption within the company. The whistle-blower policy has successfully been tested.</p> <p>No surprising risks were found in the risk analysis.</p>
Product information	<p>Are all product specifications up-to-date?</p>	<p>The quality department has found a backlog in the product specifications. In 2020, an employee will take on the task to update all specifications.</p>	<p>The product specifications have been updated by an employee from the quality department.</p>

Boundary and evaluation of material themes

Themes	Reason for materiality	Boundary	Policy	Grievance mechanism	Evaluation
Organisational governance	Organizational governance forms the basis of sustainability, safety, integrity, and the effectiveness thereof.	This theme is focused on the internal governance of Luiten Food.	Forms the basis of the policy and influences its effectiveness	Whistleblower scheme	The whistleblower scheme has been tested and is operational. Has never been used for a real purpose.
Relationship between employer and employee	Employees are crucial to the success of Luiten Food. The state of the relationship decides the success of the company.	This theme is focused on the relationship between employees and Luiten Food.	Is part of the general policy of Luiten Food.	External confidential counselor.	External confidential counselor is still available for help but has not been necessary.
Diversity and opportunities / Equal treatment	Both out of our ethical standpoint and compliance with Dutch law.	Focused on internal affairs within Luiten Food.	Is part of the general policy of Luiten Food.	External confidential counselor.	External confidential counselor is still available for help but has not been necessary.
Forced and compulsory labour	Both out of our ethical standpoint and compliance with Dutch law.	Focused on internal affairs within Luiten Food. Additional risk assessment on countries where suppliers are operational.	Part of the general policy and quality system	External confidential counselor for internal employees.	External confidential counselor is still available for help but has not been necessary.
Consumer health and safety	The safety of consumers is the main priority.	From farm to fork the safety of the product should be monitored.	Is part of the general policy of Luiten Food. The quality system is implemented to guarantee consumer safety.	Complaint mechanisms and external confidential counselor	Mechanisms are in place and operational.
Consumer privacy	Compliance with Dutch Law. The theme is important but not material according to the CSR team. Limited questioning of stakeholders makes exclusion from materiality impossible.	Focused on all sensitive information from stakeholders kept by Luiten Food.	Is part of the general policy of Luiten Food.	Complaint mechanism. The type of remedy depends on the situation	No complaints regarding privacy have been reported.
Energy	'Greenification' of our energy supply is a crucial part of sustainability.	This topic involves the reduction of scope 1 and 2 emissions. Furthermore, we measure the scope 3 emissions of transport to customers.	Is part of the general policy of Luiten Food. A long-term goal has been formulated	n.a.	A goal has been formulated in 2021. n.a. to 2020.

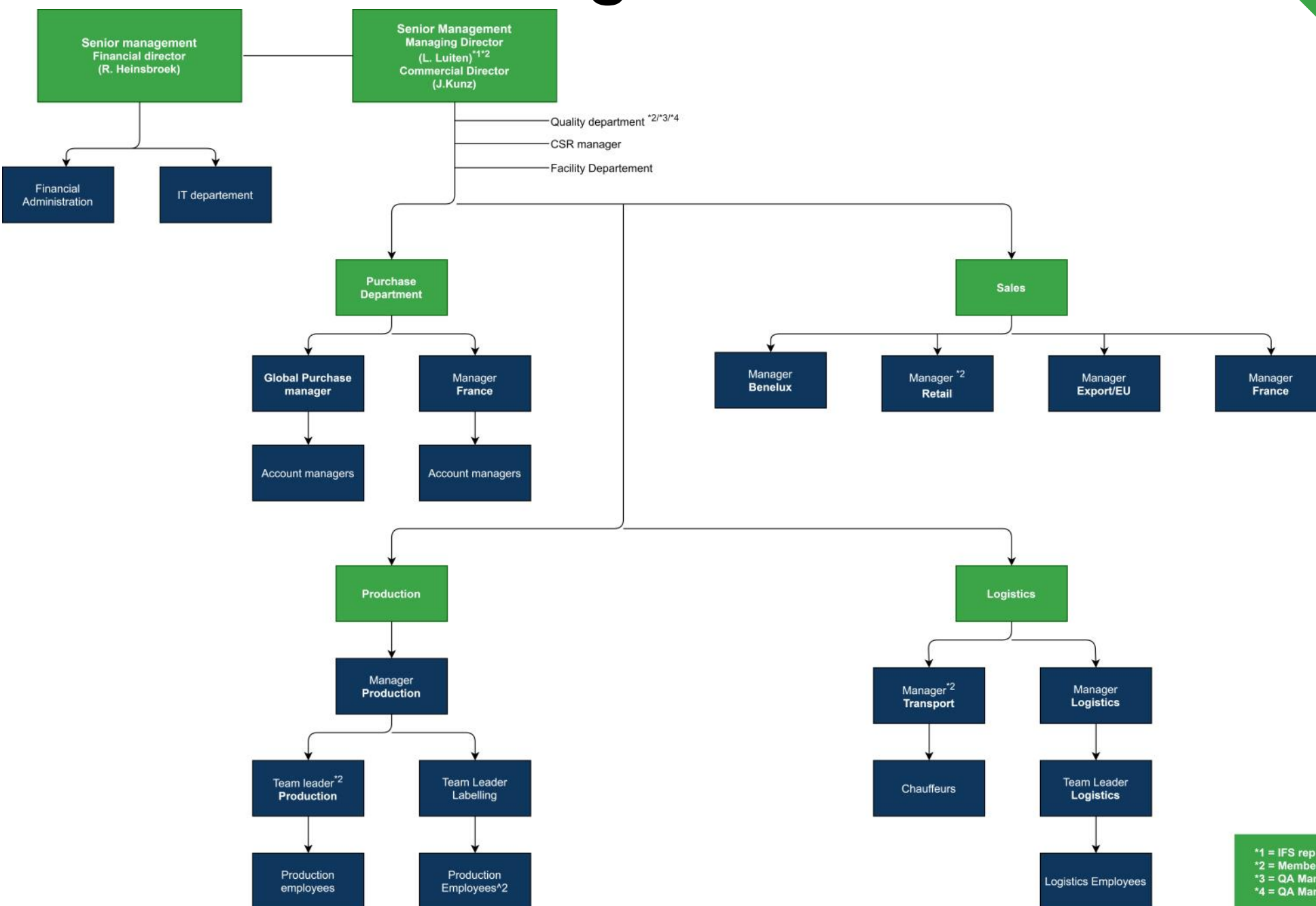
Boundary and evaluation of material themes

Themes	Reason for materiality	Boundary	Policy	Grievance mechanism	Evaluation
Transport	'Greenification' of our fleet is a crucial part of sustainability.	This theme measures both the emissions from our own fleet and the scope 3 emissions of external transport. The reduction of emission only involves our own fleet.	Is part of the general policy of Luiten Food. A long-term goal has been formulated	n.a.	A goal has been formulated in 2021. n.a. to 2020.
Contribution to the economic system	Limited questioning of stakeholders makes the exclusion of this theme from materiality impossible.	Limited to the contribution of Luiten Food alone.	By managing other themes. It is believed that Luiten Food takes care of the people, planet, and profit aspects automatically.	n.a.	n.a.
Employment	Employees are crucial to the success of Luiten Food. The type of employment can decide the success of the company.	Limited to the relation between the employee and Luiten Food.	Is part of the general policy of Luiten Food.	n.a.	n.a.
Health and Safety	The health and safety of employees are crucial to their well-being. Compliance with Dutch law is furthermore also important	Limited to the health and safety of employees working for Luiten Food.	Part of the general policy and quality system.	External confidential counselor.	External confidential counselor is still available for help but has not been necessary. Matters regarding this topic have been successfully dealt with internally.
Strategy and policy	Human rights are of the utmost importance.	Focused on internal affairs within Luiten Food. Additional risk assessment on countries where suppliers are operational.	Part of the general policy and quality system	External confidential counselor for internal employees.	External confidential counselor is still available for help but has not been necessary.
Child labour	Human rights are of the utmost importance.	Focused on internal affairs within Luiten Food. Additional risk assessment on countries where suppliers are operational.	Part of the general policy and quality system	External confidential counselor for internal employees.	External confidential counselor is still available for help but has not been necessary.
Corruption	Corruption should be avoided in accordance with Dutch Law and certification standards.	This theme is focused on the internal governance of Luiten Food.	Part of the general policy.	Whistleblower scheme	The whistleblower scheme has been tested and is operational. Has never been used for a real corruption scandal.

Boundary and evaluation of material themes

Themes	Reason for materiality	Boundary	Policy	Grievance mechanism	Evaluation
Product information	Product information is a material topic in the food sector in which Luiten Food is operational.	Focused on the product information received from suppliers, created by Luiten Food, and demanded by customers	Part of the general policy.	Complaint mechanism.	The complaint mechanism works. Product information is continuously updated and monitored.
Raw materials	Raw materials are an important part of the general existence of Luiten Food.	Focused on the use of Raw materials by Luiten Food.	Part of the general policy.	n.a.	Numbers of raw materials can be gathered at every moment.
Emissions, wastewater and residual waste	Reducing emissions, wastewater, and residual waste is an important part of sustainability. Also for Luiten Food.	Focused on scope 1 and 2 emissions and internal waste products.	Part of the general policy.	n.a.	A goal has been formulated in 2021. n.a. to 2020.
Direct economic values that are generated and distributed	Compliance with Dutch Law. Financial statements are obligatory.	The financials of Luiten Food	Part of the general policy.	n.a.	Externally audited in 2020
Animal welfare	Ethical standpoints are continuously changing and the customer demands increased transparency and animal welfare.	Animal welfare should be guaranteed throughout the supply chain.	Part of the general policy. Furthermore, quality systems and standards prescribe how the policy should be formulated.	Complaint mechanisms and external confidential counselor	Audited yearly by multiple standards and institutions.

Our governance structure



*1 = IFS representative (Managing director)
 *2 = Member of HACCP-team
 *3 = QA Manager = Integritymanager
 *4 = QA Manager = MSC/ASC (CoC) contact

Our policy

We Luiten Food:

- Meet the wishes and demands of customers.
- Take responsibility for the environment, by means of controlling energy, wastewater and waste, e.g. by sorting waste, etc.
- Make use of sustainable raw materials and materials as much as possible.
- Respect all religions and nationalities and try to facilitate religious practices if this has no cost-increasing consequences.
- Do not use products produced with involvement of child labour or other types of human right violations insofar knowledge of this is available.
- Motivate and involve employees in the decision-making process to improve process, product and organizational conditions.
- Maintain a food safety culture, in which 'teamwork', 'commitment', 'responsibility', 'trust' and 'learning' are the central pillars.
- Prevent situations that could endanger food safety. Starting with the purchase and acceptance of the raw materials up until delivery.
- Perform entry checks, supplier assessments and microbiological checks to ensure the quality of the products.
- Comply with the requirements and obligations prescribed by law and certifications.
- Provide the necessary resources to ensure product safety, legality, integrity, and quality.
- Ensure that this policy is also effectively implemented by means of objectives so that we can constantly evaluate and adjust if necessary.
- Specify the (raw) materials, resources and outsourced work to be ordered so that safety and health risks related to the process and product are reduced.
- Declare that product specifications will be made available containing information about ingredient declaration, allergen information, shelf life and directions for use.

Data gathering and changes

How have employee numbers been compiled?

Employee numbers are monitored and kept in our payroll system. Here we can gather all data on our full-time, part-time, and on-call workers. Workers from employment agencies are not recorded in the numbers because of the flexible nature of employment and the often-changing team. Furthermore, the number of temporary workers fluctuates throughout the year because of the increased volumes during Christmas.

Significant changes from the previous reporting period:

- The report has been restructured.
- The report now contains information about 2020 and 2021, which makes a comparison somewhat possible.

Defining report content:

The report content has been defined and partly compiled using the GRI Core option. For the year 2020, the material themes have not changed and will be reported on at least on their KPI. Some themes which were of utmost importance this year or are part of our longer-term vision, are given their separate page. The topic boundaries are defined by the scope of our CSR performance ladder certificate.

External Assurance:

This report (with the exception of the financial data) has not been externally checked and therefore has no external assurance.

Precautionary Principle approach:

Luiten Food, in principle, uses the Precautionary principle approach. Although not explicitly using this term, assessments are made whether a product or investment will create abnormal or irreversible side effects to nature, health, or society.

Additional Disclosures within GRI:

This report has been set up by following the GRI 101 102, and 103 disclosures. Additional topic-related standards have not been implemented yet since next year many of the obsolete material themes will be removed when the materiality questionnaire is executed. Therefore, this report does not completely qualify as a GRI compliant report.



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May 2021

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