

## Sustainability Policy

# SUSTAINABLE SOURCING

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## 1. Context

Sustainable sourcing means that we introduce sustainability considerations to how we source. We buy our raw materials or products differently or elsewhere than before.

This is possibly by:

- Setting sustainability requirements for our business partners as a condition for working together
- Introducing alternative purchasing strategies
- Setting up business partner collaborations

There are several reasons to start sourcing more sustainably. The decision to take a measure may be prompted by one or more of these reasons:

- based on our social and ethical commitment, to which we attach particular importance as a Belgian family business
- steering from Colruyt Group's strategic plan and the role of sustainability in this ([Annual report with sustainability report | Colruyt Group](#) and [Sustainable entrepreneurship or corporate social responsibility | Colruyt Group](#))
- the elaboration and implementation of our due diligence policy and process
- with a view to limit risks for the group, for example in the context of supply
- the fact that we want to remain a pioneer when it comes to sustainable sourcing
- implementing legislation

Taking measures to source more sustainably has one or more of the following purposes:

- making a positive difference, creating sustainable added value, and giving concrete meaning to our social and ethical commitment
- making the products we offer to our end customers more sustainable
- making our supply chains more resilient, in which security of supply plays an important role
- avoiding negative social and ecological impact with our business partners
- and finally, the financial health of our company

Sustainable sourcing is also a long-term objective to do business in an economically sustainable and profitable manner. And a healthy, good commercial relationship is also a condition to be

able to source more sustainably. By sourcing more sustainably, we want to become more mature in sustainable entrepreneurship, but also ask or stimulate this among the business partners we purchase from. We take steps together and also make our relationship with our business partners more sustainable where possible.

Today, we are already implementing various measures in the scope of sustainable sourcing. But we focus on the continuous movement: the work is never done. In the future, we also want to continue to make well-considered and clear choices for the initiatives we take to continue to make our sourcing more sustainable. Based on that observation, this document has the following purpose:

- to show what we mean by sustainable sourcing and what we want to achieve with it
- to provide an overview of the measures we are already taking today in the scope of sustainable sourcing and which objectives this contributes to

## 2. Strategic choices and changes

### 2.1 Strategic choices

#### *A. The international and European framework as a guideline, our sustainability group objectives as the base*

We develop our sustainable sourcing policy with relevant international guidelines as the guiding principle, such as the United Nations Guiding Principles on Business and Human Rights (UNGP), the United Nations Sustainable Development Goals (SDGs) or the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises on Responsible Business Conduct. The European Corporate Sustainability Due Diligence Directive is a second important framework.

For Colruyt Group, we have set 17 sustainability objectives, within the scope of our infrastructure, people (our co-workers, customers, and the co-workers involved throughout the entire chain from farm to table) and the products we sell ([Annual report with sustainability report | Colruyt Group](#)). The objectives in product scope regarding human rights, climate and the protection and repair of ecosystems co-determine the further elaboration and implementation of our sustainable sourcing policy. Concretely, these are interpreted as follows:

- Human rights: we actively identify and mitigate possible violations linked to our high-risk food chains

- Climate: we reduce the greenhouse gas emissions of our sold products
- Biodiversity: by 2030, we will eliminate deforestation and land use conversion for products from high-risk chains

*B. Where possible, we build a long-term relationship with our business partners*

As a Belgian family business and retailer, we've been working together with an important part of our business partners for years. From the large international FMCG players to SMEs from our Belgian agri-food sector, and many more business partners of various kinds in between.

A long-term relationship is based on dialogue, trust and a mutual good understanding of the collaboration and how it is interpreted. As mentioned earlier, a healthy and sustainable relationship is often a necessary condition to take steps together in further sustainability and sustainable sourcing.

*C. Exchanging and collaborating with Belgian and international stakeholders*

We want to continue to make clever use of existing platforms or organisations to further refine our policy regarding sustainable sourcing and implement it with our business partners.

This can be done through the retail federation comeos and Eurocommerce, where we try to formulate a common and coherent position and approach as a retail sector, also towards our business partners, for example. We also enter into dialogue with other sector-specific organisations, for example for fruit & vegetables and for meat, about our expectations regarding climate and CO<sub>2</sub> reduction.

Organisations that set up standards or guidance for chain partners are also important stakeholders for us to sharpen and/or implement our policy on sustainable sourcing; think of Global Standards 1 (GS1), [Amfori Business Social Compliance Initiative](#) (BSCI), Science Based Target initiative (SBTi), or The Sustainability Initiative Fruit and Vegetables (SIFAV). It's a strategic choice to help drive broad partnerships such as beyond chocolate, the Belgian multi-stakeholder partnership that aims to make the entire Belgian chocolate sector more sustainable. Based on our strategy and our role as retailer, we continue to enter into dialogue and action with our business partners in a targeted and 1-on-1 manner for more sustainability.

*D. The levers to make our private labels and A brands more sustainable are different, but we focus on them fully where possible*

Legal requirements or minimum standards naturally apply to both A brands and private labels. The expectation of having Science Based Target Set climate plans also applies to both.

However, for private labels, our leverage to become more sustainable is much greater. For our private labels, we use more specific measures - see point 3. How do we implement this policy?.

Many business partners who supply A brands have sustainability programmes and action plans; we want to make smart choices with them where we can reinforce each other in more sustainable sourcing. We do this by taking additional measures or setting up joint sustainability projects.

*E. We want to align the measures we take in the context of sustainable sourcing with our policy and choices regarding security of supply*

Even more than before, security of supply is a strategic necessity that also requires a policy and well-considered choices. This often also comes with sustainability issues.

We align how we source sustainably and how we want to implement security of supply into a coherent whole in the long run as much as possible. When making concrete choices regarding sourcing region or business partners we consider both where relevant and make clear, substantiated choices where necessary.

### **3. Objectives**

Colruyt Group has 17 sustainability objectives of its own. More sustainable sourcing contributes to several of these quantitative and qualitative objectives at Colruyt Group level:

Circular products with a focus on packaging and food loss

- We are gradually increasing our share of circular packaging
- We reduce food loss and food waste

Reduce the environmental impact of our products

- By 2030, we will eliminate deforestation and land use conversion for products from high-risk chains
- By 2027, 77% of our business partners (by purchase figures) will have science-based climate plans
- We reduce the greenhouse gas emissions of our sold products

Buying socially responsibly

- We promote human rights by actively identifying and remedying human rights violations
- We help to raise the living standards of farmers associated with high-risk products
- We contribute to improved living conditions of animals bred for consumption

## 4. Changes

- **Strengthening and further implementation of due diligence processes:** more systematic risk analyses, traceability and follow-up.
- **Targeted and structured expansion of dialogue, exchange and collaboration with business partners** to realise our sustainable sourcing policy.
- **Further elaboration of a business partner policy on sustainability.** This requires us to have a usable segmentation in terms of sustainability (maturity, strengths and weaknesses, priorities, etc.) of our business partners. We set this up in a pragmatic and workable manner.
- **Deepening the knowledge, craftsmanship and attitude of buyers regarding sustainable sourcing** and how we deal with business partners. Both for day-to-day business and in the context of long-term relationships we build with suppliers. We elaborate an ethical charter for our buyers, in which we include principles and commitments on how we deal with business partners. This is based on the 9 partnership principles that are published ([Our partnership principles | Colruyt Group](#)). Finally, our buyers are regularly updated and briefed on sustainable sourcing, and participate in external information sessions or training courses.

## 5. How will we implement this policy?

We implement our sustainable sourcing policy according to three ambition levels:

- Setting sustainability requirements for our business partners as a condition for working together
- Introducing alternative purchasing strategies
- Setting up business partner collaborations

## 5.1 Setting sustainability requirements for our business partners as a condition for working together

These are, usually one-sided, expectations imposed by Colruyt Group on its business partners regarding sustainability, to eliminate the main negative sustainability impacts.

Concretely, we set the following requirements:

- Letter of Commitment (LOC) and Code of Conduct (COC) for all private-label business partners, based on the Amfori Business Social Compliance Initiative (BSCI) code of conduct. Compliance monitoring focuses on high-risk countries where the protection of human rights is not self-evident and is conducted through social audits by recognised auditing agencies. In case of non-compliance, the producer or supplier is contacted and support offered. A discontinuation of the collaboration in principle occurs in case of serious violations or lack of goodwill of the partner to work on improvement.
- Climate targets in line with the ambition level and regulations of the Science Based Targets initiative (SBTi)
- Recognised certificates for products with a risk of a high impact on people and the environment. For our private-label products, these are:
  - ✓ Chocolate and products containing cocoa: Bio, Fairtrade and Rainforest Alliance
  - ✓ Wood and paper: Programme for the Endorsement of Forest Certification (PEFC), Forest Stewardship Council (FSC) and Der Blaue Engel
  - ✓ Cotton: Global Organic Textile Standard (GOTS)
  - ✓ Coffee: Bio, Fairtrade and Rainforest Alliance (RFA)
  - ✓ Palm and palm kernel oil: Roundtable on Sustainable Palm Oil (RSPO)
  - ✓ Soy: Bio, ProTerra and Round Table on Responsible Soy Association (RTRS), and compensation through RTRS credits
  - ✓ Farmed fish, crustaceans and shellfish: Aquaculture Stewardship Council (ASC) and Bio
  - ✓ Wild fish, crustaceans and shellfish: Marine Stewardship Council (MSC) and positive assessment by the ILVO (Belgian Institute for Agriculture and Fishery research) or International Seafood Sustainability Foundation (ISFF) for tinned tuna

Since the end of 2025, a supplier page 'Become a supplier' has been added to the corporate website ([Become a supplier for Colruyt Group | Colruyt Group](#)). This is one central point of contact for candidate suppliers and the place where the latest versions of business partner

requirements are available. Our sustainability requirements are included in the contractual agreements with business partners.

## 5.2 Introducing alternative purchasing strategies

The way in which we contract can also effectively support business partners in their further sustainability and our relationship with them. Some measures are already applied today, and we want to explore a number of other methods in the market.

The alternative is mainly in the fact that we make different agreements than the standard ones, about:

- duration of our collaboration
- pricing upstream in the supply chain: we pay our business partners a fixed or stable price, sustainability premiums or a living income or wage for the producers at the beginning of the supply chain
- volumes supplied by chain partners and purchased by us

## 5.3 Setting up business partner collaborations

These are measures where the introduction of alternative purchasing strategies is supplemented with one or more sustainability initiatives regarding people, the environment or animal welfare. A condition for speaking of a business partner collaboration is that we as buyers actively contribute to the sustainability initiative and that this is therefore elaborated and set up together with partners.

## 6. Who is responsible?

The responsibility for the implementation of the sustainable sourcing policy was assigned to the **Business Lead** appointed at Colruyt Group: Geert Roels, CPO Colruyt Group. The Business Lead takes ownership of the implementation of the policy, as well as the corresponding objectives, and decides on the necessary changes and actions. It's the responsibility of the Sustainability Service Centre, led by the **Corporate Sustainability Officer**, An Wynants, to ensure the necessary reporting and thus help monitor the effectiveness of the implementation of the policy.

The final responsibility for the implementation of Colruyt Group's overarching sustainability policy lies with Colruyt Group's **Management Committee** led by the CEO, Stefan Goethaert.

## **7. How are stakeholders engaged and informed?**

All stakeholders can consult the website for more information on our approach and concrete achievements. Colruyt Group's annual report also includes information on the policy, the objectives and the actions we take to make packaging more sustainable.

We collaborate with our suppliers both pro-actively and operationally.

Pro-actively: we discuss trends and evolutions to make the value chains in the sector more sustainable and examine the usefulness and necessity of (pre-competitive) collaborations

Operationally: business partners are informed through communication of the quality requirements, internal company positions, conditions in tenders, etc.

Public Affairs defends our vision to the sector federations and always includes the basic principles in the lobby for sustainable products.