



## **McCORMICK & COMPANY, INCORPORATED**

### **Modern Slavery Statement 2024-2025 - Australia, Canada, United States (California) and United Kingdom**

This is the modern slavery and human trafficking statement of McCormick & Company Incorporated, and its reporting subsidiary entities listed in Addendum I (also referred to in this document as “*McCormick*” or the “*Company*”) prepared for fiscal year 2024-2025.

This statement was prepared in accordance with Australia’s *Modern Slavery Act 2018*, Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, *California Transparency in Supply Chains Act* and United Kingdom’s *Modern Slavery Act 2015* (collectively the “*Labour Acts*”).

A table outlining how this statement aligns with the reporting criteria of the Labour Acts can be found in Addendum II.

McCormick believes in fundamental standards that support our commitment to our employees, our business partners, our customers, and our communities. Our global business standards for working conditions and human rights that applies to our employees, suppliers, and business partners align with the concepts advanced by international organizations such as the International Labor Organization and the United Nations Global Compact on Human Rights. As a member of the UN Global Compact, we commit to implement universal sustainability principles that meet fundamental responsibilities, including in the areas of modern slavery, forced labor, child labor, and human trafficking. This statement describes the risks of these practices occurring in our operations and supply chain and the actions we take to assess and address those risks.

In addition, McCormick intends for this statement to fulfill the requirements of each Labour Act as the risks and our efforts to address them are consistent throughout our global supply chain. This statement has been approved by the board of directors of McCormick.

## **Section 1: ORGANIZATIONAL STRUCTURE AND SUPPLY CHAIN**

Founded in 1889, McCormick is a global leader in flavor. We manufacture, market, and distribute spices, seasoning mixes, condiments, and other flavorful products to the entire food industry – retailers, food manufacturers, and foodservice businesses.

We operate in two business segments, consumer, and flavor solutions. Our major sales, distribution and production facilities are located in North America, Europe, and China with additional facilities based in Australia, Central America, Thailand and South Africa.

A key part of McCormick's value chain is the agricultural producers that provide the raw materials for our products. McCormick ingredients are sourced from a variety of locations, including Brazil, Canada, China, India, Indonesia, Madagascar, Mexico, Turkey, United States, and Vietnam. The most significant raw materials used in our business are pepper, dairy products, capsicums (red peppers and paprika), onion, garlic, tomato products, salts, and wheat products. Pepper and other spices and herbs are generally sourced from countries other than the United States. Other raw materials, like dairy products and onion, are primarily sourced either within the United States or from our international locations. A variety of mechanisms are used to source agricultural raw materials, including joint venture partners and strategic alliances. McCormick relies on farmers around the world to produce the raw materials we use in our products. We work with a variety of external partners and stakeholders, including suppliers and non-governmental organizations

(NGOs), to identify the specific needs of our sourcing communities and create projects to enhance social and economic livelihoods around the world.

## **Section 2: OUR POLICIES AND SUPPLIER CODE OF CONDUCT**

It has always been important that materials used by McCormick in its products are obtained through ethical and fair labour conditions. In general, McCormick's agricultural products are purchased from suppliers who ultimately source raw materials from small individual farms managed by family farmers. In all countries where McCormick processes products, those products are processed in facilities that comply with existing local laws. In McCormick's own processing facilities (foreign and domestic), employees are provided with fair wages, regular working hours, and a clean, safe working environment.

Through the Company's Global Supplier Code of Conduct<sup>1</sup>, Business Ethics Policy<sup>2</sup>, Human Rights Policy<sup>3</sup> and Sustainable Agriculture Policy<sup>4</sup>, we make clear our commitment to fair labor standards and help ensure that the Company aligns itself with suppliers that share this commitment and expect the same of their own suppliers. McCormick's Global Supplier Code of Conduct states that all vendors, suppliers, and contractors who wish to conduct business with McCormick are required to conform to certain principles and practices, such as the following:

- Fair employment practices, including those prohibiting child labor, prison or forced labor, or any form of indentured servitude with stipulations of fair working hours and compensation as well for a safe working environment;
- Compliance with applicable laws, including those pertinent to equal employment opportunities, wages and benefits, and worker and product safety; and
- Ethical business conduct based on compliance with the law, avoidance of conflicts of interest, and respect for the environment.

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<sup>1</sup> <https://www.mccormickcorporation.com/en/responsibility/governance-and-approach/governance-and-reporting/global-supplier-code-of-conduct>

<sup>2</sup> <https://www.mccormickcorporation.com/en/responsibility/corporate-governance/business-ethics-policy>

<sup>3</sup> <https://www.mccormickcorporation.com/en/responsibility/corporate-governance/human-rights-policy>

<sup>4</sup> <https://www.mccormickcorporation.com/en/responsibility/people/diversity-equity-and-inclusion/supplier-diversity/sustainable-agriculture-policy>

McCormick strives to ensure that quality, safety, and employment standards are maintained throughout the Company's supply chain and the Company regularly reviews its supplier base to determine if corrective actions are needed. Moreover, McCormick maintains a confidential hotline staffed by an independent organization for employees and others to report actual or potential violations of McCormick's policies and codes of conduct without fear of retaliation.

**a. Verification and audit of product supply chains**

The Company utilizes a risk-based verification process to identify suppliers that present a higher risk and an appropriate, responsible sourcing audit approach to help ensure the Company's product suppliers comply with McCormick's Global Supplier Code of Conduct. The Company conducts risk assessments and audits of suppliers prior to and regularly throughout the business relationship. If any instances of critical non-compliance are discovered, the supplier must correct them and have them verified by an independent auditor before the Company will resume purchasing from the supplier. If the vendor is unable to comply within a set time, the Company may terminate its relationship with the supplier. Through its Global Supplier Code of Conduct, the Company also requests that neither the supplier nor any of its suppliers utilize any type of forced labor in the processing and/or manufacturing of the products being supplied to McCormick and conducts its business with McCormick to the same or similar standard of McCormick's Global Supplier Code of Conduct.

**b. Contracting Practices**

McCormick's Global Supplier Code of Conduct is designed to be embedded into the Company's procurement practices (and thereby help assure such procurement is free from forced labour, child labour, slavery, and human trafficking) by:

- including references to the Global Supplier Code of Conduct in major request for quotations;
- incorporating language in all supply agreements and contracts requiring suppliers to warrant compliance with the Global Supplier Code of Conduct and acknowledge that any known violation may result in immediate termination of any and all business;

- providing a link to the Global Supplier Code of Conduct in certain purchase order terms and conditions stating that acceptance of the purchase order constitutes an agreement to adhere to the latest version of the Global Supplier Code of Conduct;
- requiring acknowledgement of the Global Supplier Code of Conduct as part of all new suppliers onboarding process;
- collaborating with suppliers to share best practices.

### **c. Internal accountability and staff training**

It is the Company's overarching policy to be a good corporate citizen, as set forth in our Business Ethics Policy (see [ir.mccormick.com](http://ir.mccormick.com) under **Governance**, then **Policies and Disclosures**, then **Business Ethics Policy**). Wherever McCormick does business, the Company's employees are required to comply with all applicable laws. Human rights training is provided to supply chain employees on how to identify and mitigate the risk of human trafficking and slavery. Additionally, regular mandatory training on Supplier Code of Conduct and Human Rights is provided to all procurement staff, which covers, among other risks, human trafficking, forced labour and child labour. As part of the training, participants are tested to assess and evaluate the knowledge gained through the training, and our staff in the UK is informed about the UK government's 24-hour modern slavery public telephone helpline (0800 0121 700).

### **d. Industry Collaboration**

McCormick works with other companies and organizations in the food industry in an effort to send a stronger message to industry suppliers about the importance of maintaining supply chains free of forced labour, child labour, slavery and human trafficking.

To aid in McCormick's collaboration efforts, the Company is an active member of the Consumer Goods Forum (CGF), a global organization whose objective is to bring together consumer goods manufacturers and retailers to provide practical help to implement global standards and best practices for efficiency and positive change. McCormick's Chairman, President and CEO is currently a member of CGF's Board of Directors. One of CGF's strategic framework pillars

focuses on environmental and social sustainability, including the eradication of forced labour from supply chains.

As a member company of the United Nations Global Compact (UNGC), McCormick participated in its Business & Human Rights Accelerator training program in 2024, through which the Company collaborated with companies across industries and regions to advance action on human rights and labor rights.

Additionally, our participation in industry organizations such as the Sustainable Spice Initiative (SSI) and Sustainable Vanilla Initiative (SVI) facilitates industry-wide collaboration in driving improved environmental and social standards. We collaborate with peer companies to define a common language and align on tools for sustainable sourcing and farmer resilience.

In 2024 McCormick embarked on a Human Rights Due Diligence project starting with an ESG Risk Assessment and Supply Chain Saliency Assessment to identify the sourcing operations with significant actual and potential negative impacts on farming households and local communities in the value chain.

### **Section 3: OUR EFFECTIVENESS IN ELIMINATING SLAVERY AND HUMAN TRAFFICKING**

McCormick utilizes a supplier scorecard process, that includes the number of suppliers targeted by region and risk level, determined by an assessment and audit score, as a key performance indicator to measure the Company's effectiveness towards ensuring that forced labour, child labour, slavery and human trafficking is not taking place in the Company's supply chain. This process uses formal assessments and risk-based audits to verify that the Company's suppliers in its supply chain are in compliance with International Labour Organization regulations and McCormick's requirements regarding prohibition of slavery and human trafficking. McCormick will remain transparent and report on its evolving efforts to combat the risks of forced labour, child labour, slavery, and human trafficking in the Company's supply chain.

**a. The risk of forced labor and child labor practices**

At McCormick, we pride ourselves in delivering high-quality agricultural products that exceed the expectations of our consumers and customers. To achieve this, our products are manufactured in accordance with the highest environmental, social, and governance standards. Due to the nature of our business, we source approximately 14,000 ingredients from over 85 different countries and, in many cases, multiple regions within those countries. Each community faces its own unique challenges and therefore it's important for us to get a deeper understanding of the risks and opportunities that each community faces.

McCormick diligently strives to address any identified risks related to forced labour and child labour within its supply chain. The company takes proactive measures, including contacting suppliers and other business partners to complete third-party risk questionnaires and implement mitigation plans. In situations where alternative remediation efforts fall short, McCormick retains the right to terminate contracts.

**b. Actions are taken by McCormick to assess and address child labor and forced labor risks.**

McCormick requires its suppliers to be aware of and comply with all applicable laws and regulations of the countries where they conduct business; conduct business responsibly, with integrity, honesty and transparency; and to adhere to McCormick's standards as set forth in its various policies and codes of conduct, as discussed further below, particularly as they apply to the following employment practices: Labor; Working Hours; Compensation; Non-Discrimination; Workplace Health & Safety; and Respect of the Environment.

We use various resources, such as the U.S. Department of Labor's High-Risk List for Child Labor and Forced Labor, as the basis for determining risk in regions and countries where we source ingredients. We continuously assess plans for our highest-risk countries and ingredients and require our supply partners to reduce and ultimately eliminate incidents of unethical practice throughout our supply chain. For instance, McCormick is part of the SSI (Sustainable Spices

Initiative) impact working group, which aims to collaboratively address industry-wide human rights issues, including child labour.

McCormick also works with the Supplier Ethical Data Exchange (SEDEX) and Supplier Member Ethical Trade Audit (SMETA) for various environmental, social and governance assessments for all existing and new suppliers that are defined as potentially high risk in our supply chain. In addition, farm-level certification includes criteria on fair labor practices for farm workers. This is audited by an independent third-party and farms must be in compliance to receive certification.

McCormick has also partnered with Verisk Maplecroft, a global risk intelligence company, to assess environmental, social and governance risks across our agricultural raw materials representing our largest volume and spend. Suppliers must register with the Supplier Ethical Data Exchange (SEDEX) and undergo a social compliance audit to monitor labor standards, health and safety, business ethics and environmental considerations at their facilities. This is also a requirement for suppliers who provide us with commodities identified on the U.S. Department of Labor's high-risk list. In addition, all audits, reaudits, and updates must be submitted and uploaded via the SEDEX portal. The forced labour component of a SMETA audit requires the auditors to examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place. These audits provide a baseline of data allowing McCormick to assess the supplier's compliance more accurately and comprehensively with McCormick's Global Supplier Code of Conduct and potential areas for improvement.

McCormick has not found any evidence to suggest the measures it has implemented to address forced labour and child labour risk within its supply chain have resulted in any discernible loss of income to the most vulnerable families.

Under our Grown for Good framework, we review risks with in-country suppliers, working with them to evaluate the threat and opportunities in their specific supply chains, and request that they provide evidence of how the risk is mitigated or a plan as to how it will be. Currently, McCormick



is working with CARE International to conduct a social needs analysis for the key origins from which we source our top five iconic raw materials.

As a general principle, McCormick is deeply committed to supporting local communities by actively engaging in initiatives that enhance their well-being. Through strategic partnerships, investment in local infrastructure, and capacity-building programs, we aim to foster sustainable development and empower community members.

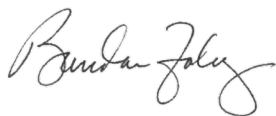
McCormick has invested significantly in local communities we partner with. For example, in Madagascar we have invested in four reverse osmosis systems to facilitate access to clean drinking water for local communities and restored primary schools to increase access to education. This investment is expected to positively impact 19,500 community members. We have also funded vanilla processing centers in remote communities, allowing farmer cooperatives to reap additional economic benefits from the processing operations.

#### **Section 4: APPROVAL AND CONSULTATION**

##### **a. McCormick and Company, Incorporated**

McCormick and Company, Incorporated and each of its reporting subsidiary entities under the Labour Acts consulted with staff from each entity in preparing this statement, including various meetings and briefings amongst supply chain, sustainability, and procurement teams.

This statement was approved by the Board of Directors of McCormick and Company, Incorporated on March 26 2025.



Brendan M. Foley

Chairman of the Board of Directors

McCormick and Company, Incorporated

## **b. McCormick Australia Reporting Entities**

This Statement was approved by the Board of Directors of McCormick Foods Australia Pty. Ltd. on 14<sup>th</sup> March 2025, which is the relevant reporting entity under Australia's *Modern Slavery Act 2018* (the "Australia Act"). For purposes of the Australia Act, there is only one entity owned or controlled by McCormick Foods Australia Pty. Ltd., which is Botanical Food Company Pty. Ltd. The statements made herein apply to this entity as well.



Paris Golden

Managing Director

McCormick Foods Australia Pty. Ltd.

**c. McCormick Canada Reporting Entities**

This report was approved by the Boards of Directors of La Cie McCormick Canada Co. and The French's Food Co., Inc. on 14<sup>th</sup> March 2025, in accordance with section 11(4)(b)(i) of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Canada Act"), on behalf of the Canada Act reporting entities listed in Addendum I.

"In accordance with the requirements of the Canada Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canada Act, for the reporting year listed above."

A handwritten signature in black ink that reads "Trevor Squires". The signature is written in a cursive, flowing style.

Trevor Squires

GENERAL MANAGER - CANADA & NAM BFS, CA CIG

Director of La Cie McCormick Canada Co. and The French's Food Co., Inc

**d. McCormick United Kingdom (UK) Reporting Entities**

This Statement was approved on 14<sup>th</sup> March 2025 by the Board of Directors of the relevant reporting entities under the UK's *Modern Slavery Act 2015* listed in Addendum I.

A handwritten signature in black ink, appearing to read 'Ana Sanchez', enclosed within a circular scribble.

Ana Sanchez

Director of McCormick UK Ltd.

<b>ADDENDUM I – Reporting Entities</b>			
<b>Canada</b>	<b>Australia</b>	<b>UK</b>	<b>US (California)</b>
La Cie McCormick Canada Co. (1144681369)	McCormick Foods Australia Pty. Ltd. <a href="#">(62 004 763 259)</a>	McCormick UK LTD <b>(SC015262)</b>	Mojave Foods Corporation (1680989)
The French’s Food Co., Inc (841471832)	Botanical Food Company Pty. Ltd. <a href="#">(47 085 074 282)</a>		

<b>ADDENDUM II – Reporting Requirement Index</b>				
<b>CANADA FIGHTING AGAINST FORCED/CHILD LABOR IN SUPPLY CHAINS ACT (2023)</b>	<b>AUSTRALIAN MODERN SLAVERY ACT (2018)</b>	<b>UK MODERN SLAVERY ACT (2015)</b>	<b>CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT (2010)</b>	<b>PLACE IN STATEMENT</b>
The entity’s structure, activities and supply chains.	Identify the reporting entity. Describe the structure, operations, and supply chains of the reporting entity	Organization’s structure, its business, and its supply chains		Section 1
Its policies and its due diligence processes in relation to forced labor and child labor	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Organization’s policies in relation to slavery and human trafficking Organization’s due diligence processes in relation to slavery and human trafficking in its business and supply chains	Describe to what extent the organization maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking. Describe to what extent the organization requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.	Section 2

<p>The parts of its business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk. Any measures taken to remediate any forced labor or child labor. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains</p>	<p>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls</p>	<p>Parts of the organization’s business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk</p>	<p>Describe to what extent the organization engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party. Describe to what extent the organization conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit</p>	<p>Section 3</p>
<p>The training provided to employees on forced labor and child labor. How the entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains</p>	<p>Describe how each reporting entity covered by the joint statement assesses the effectiveness of its actions to assess and address modern slavery risks</p>	<p>Organization’s effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate. Organization’s training about slavery and human trafficking available to its staff.</p>	<p>Describe to what extent the organization provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products</p>	<p>Section 2 b</p>
	<p>Describe the process of consultation with any entities the reporting entity owns or controls</p>			<p>Section 4</p>
	<p>Include any other information that the reporting entity considers relevant.</p>			<p>Section 3 b</p>