



LINDT & SPRÜNGLI

No-Deforestation Guidelines

Kilchberg, 2025

Introduction

Lindt & Sprüngli is committed to a strong corporate culture that includes qualities such as honesty, respect, and doing business with integrity. These principles are the basis for Lindt & Sprüngli's long-standing commitment to responsible stewardship of environmental resources as well as to a respectful attitude towards nature.

As a consumer goods company sourcing agricultural ingredients, we recognize the importance of protecting and conserving natural ecosystems we rely on for raw materials. Additionally, tackling deforestation forms a key part of our efforts to meet our science-based climate targets by 2030 and 2050.

Our No-Deforestation Policy and commitment

The Lindt & Sprüngli [No-Deforestation Policy](#) outlines our strategic commitment towards no deforestation, its scope, the implementation approach, and governance.

We commit to working towards no deforestation in cocoa and our other primary deforestation linked supply chains: palm oil, soy, and pulp- and paper-based packaging.

Objective

This document serves as a comprehensive guideline for Lindt & Sprüngli, which further details the methodology employed to determine sourcing volumes classified as deforestation-free and defines the critical terms and methods that underpin our disclosure of progress, and supports adherence to the No-Deforestation Policy. By adhering to industry standards and the [Accountability Framework Initiative \(AFI\)](#), this document aims to ensure consistency and alignment with international standards. To the extent applicable, this document also considers the EU Deforestation Regulation (EUDR) and the Lindt & Sprüngli EU Deforestation Regulation Policy. Additionally, it provides a transparent framework for monitoring and reporting, offering clarity on risk assessments and mitigation strategies.

Scope

The [No-Deforestation Policy](#) and these guidelines apply to our supply chains for primary deforestation-linked raw materials that are used in products bearing any brand of the Lindt & Sprüngli Group:

- Cocoa: includes sourcing of cocoa beans, cocoa butter, cocoa powder, and chocolate mass
- Palm oil: includes sourcing of palm oil, palm kernel oil, and their fractions
- Soy: includes sourcing of soy lecithin
- Pulp- and paper-based packaging: includes sourcing of all paper and cardboard packaging products containing wood fiber (e.g., paper, corrugated board, folding box carton)

Definitions

Unless indicated otherwise, the definitions used herein are guided by the [Accountability Framework Initiative](#).

Conversion - Loss of a natural ecosystem because of its replacement with agriculture or another land use, or due to a profound and sustained change in a natural ecosystem's species composition, structure, or function.

Cut-off date - Lindt & Sprüngli adopts a cut-off date to define deforestation-free supply chains no later than 31 December 2020. This cut-off date aligns with global goals to halt deforestation, such as Target 15.2 of the United Nations Sustainable Development Goals. It also aligns with cut-off dates used in regulatory mechanisms such as the EU Deforestation Regulation (EUDR) and voluntary mechanisms such as the Science Based Targets Network (SBTN) land targets and by the Accountability Framework Initiative. We may implement earlier cut-off dates, on a risk-based approach, to specific commodities or specific geographic sourcing area, while always respecting the minimum date of 31 December 2020.

Deforestation - Loss of natural forest as a result of: (i) conversion to agriculture or other non-forest land use; (ii) conversion to a tree plantation; or (iii) severe and sustained forest degradation.

Deforestation-free - Raw materials sourced without contributing to any deforestation event which took place prior to 31 December 2020 (Lindt & Sprüngli's own definition)

Degradation - Changes within a natural ecosystem that significantly and negatively affect its species composition, structure, and/or function and reduce the ecosystem’s capacity to supply products, support biodiversity, and/or deliver ecosystem services.

Forest - Land spanning more than 0.5 hectares with trees higher than 5 meters and a canopy cover of more than 10%, or trees able to reach these thresholds in situ forest, includes natural forests and tree plantations.

For the purpose of EUDR, relevant definitions are specified in the designated EU Deforestation Regulation Policy.

Methodology

Deforestation-free implementation options

To ensure that the raw materials we source are deforestation-free, we employ a risk-based approach. This allows us to proactively identify and mitigate risks associated with deforestation, ensuring that our supply chain remains aligned with our sustainability objectives. This risk-based approach integrates both systematic risk identification and targeted risk mitigation strategies, applied across our sourcing practices.

Our methodology is built on the following four core implementation options used to determine whether the deforestation risk is sufficiently low to deem a raw material sourced as deforestation-free:

1. Satellite and field verification
2. Certifications
3. Traceable to low-risk origins
4. Compliance with the EU Deforestation Regulation (EUDR)

Together, these four implementation options form a comprehensive framework that not only helps us assess deforestation risks, but also strengthens our ability to mitigate them systematically. The following illustrates how these options interconnect and contribute to our overarching no deforestation-commitment. These implementation options can be applied individually to specific raw materials or adapted in combination to meet the unique challenges of each supply chain: e.g. we perform satellite verification monitoring on cocoa volumes that is also certified with an acceptable certification scheme.

1. Satellite and field verification	2. Certifications	3. Traceable to low-risk origins	4. Compliance with the EU Deforestation Regulation (EUDR)		
Is the material traceable to an area assessed as deforestation-free through satellite monitoring or on-the-ground assessment?	Is the material certified through an acceptable certification scheme or Responsible Sourcing Program?	Is the material traceable to an area with negligible risk of deforestation?	Is the material a relevant product or commodity in scope of EUDR, and sourced in compliance with EUDR requirements according to Lindt & Sprüngli operations?	No ➔	Not Deforestation-Free
Yes ↓	Yes ↓	Yes ↓	Yes ↓	Deforestation-Free	

1. Satellite and Field Verification

Satellite verification

The use of satellite monitoring is an effective tool to monitor deforestation across our supply chains. We use Satelligence, a high-resolution satellite imagery platform, to monitor and detect deforestation within or around the mapped farms. Through this approach we:

- Classify land-use types and monitor forest cover change in near real-time.
- Overlap commodity specific layers with historical land-use change to understand the legacy of the plot to assess the deforestation status, and specifically for cocoa the carbon emissions of the land-use change.

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- Monitor mapped commodity production areas to ensure they are accurate and up to date.
- Validate supplier information and detect land-use change.

The robustness of satellite verification methodologies implemented by Lindt & Sprüngli and its relevant supply chain actors for cocoa is measured against the EUDR Deforestation Detection Methodology developed by the World Cocoa Foundation in collaboration with Satelligence, the European Cocoa Association (ECA) and the European Forest Institute (EFI). The satellite monitoring must cover the following steps:

1. Plot data collection: geolocation information
2. Plot data screening: geometry verification and accuracy assessment
3. Plot data check: overlap of plot data with satellite monitoring data, e.g., forest baseline layer, deforestation detection layer with quantitative and qualitative assessment on the output
4. Summary and analysis of the findings

Field verification

Field verification shall be implemented when deforestation alerts have been identified through satellite verification, or in case of ad hoc investigation or audit processes. Field verification is a crucial step in ascertaining the presence of deforestation events, understanding the context and design and execute a remediation plan. Field verification includes the following steps:

- On-site visit of the area identified
- Interviewing farmer and collecting field observation including:
 - Year of establishment of plantation
 - Year of establishment of agriculture field comparison with cut-off date
 - Land-use type prior to the establishment of the plantation
 - Presence of forest trees and signs of past clearing
 - Type of forest and vegetation cover
 - Presence of infrastructure
 - Agroforestry practices
- Documenting the findings and analyzing the findings
- Producing a conclusive statement on the occurrence or absence of a deforestation event prior to the established cut-off date
- Informing and involving the relevant stakeholders on the finding of the verification
- In case of a detected deforestation event a remediation plan is defined and implemented, including periodical monitoring and progress recording

2. Certifications

We rely on certification schemes and Responsible Sourcing Programs¹ to support the demonstration of the deforestation-free status of the sourced raw material. A certification scheme or a Responsible Sourcing Program is to be considered “acceptable” for this purpose when:

1. The definitions, criteria, requirements and cut-off date relevant to deforestation and ecosystem conversion are aligned with the AFI requirements;
2. The chain of custody model guarantees transparency and traceability relevant to the production area, transmission of information and volume controls through the supply chain. The accepted chain of custody model in relation to Lindt & Sprüngli's use of certifications schemes and Responsible Sourcing Programs are: identity preserved, segregated and in some cases, controlled mass-balance. Models that are not considered acceptable include: mass balance, book & claim and controlled blending;
3. The adherence to the scheme or program and data transparency requirements are third-party verified.

We rely on different certification schemes and Responsible Sourcing Programs for the different commodities in scope of our no-deforestation commitment.

Cocoa - For cocoa we rely on satellite or field verification under the Lindt & Sprüngli Farming Program (see implementation option 1) and/or the Rainforest Alliance certification standard to demonstrate deforestation-free sources. To deem a raw

¹ Responsible Sourcing Programs are a set of interventions or investments made with the aim of addressing one or more social or environmental criteria associated with a raw material or sourcing origin

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material sourced as deforestation-free, the acceptable chain of custody models are identity preserved, mixed identity preserved and segregated volumes.

Palm oil - For palm oil we rely on the Roundtable on Sustainable Palm Oil (RSPO) or International Sustainability & Carbon Certification (ISCC) standards to demonstrate deforestation-free sources. To deem a raw material sourced as deforestation-free, the acceptable chain of custody model in this case is segregated.

Soy - For soy lecithin volumes we rely on the ProTerra certification scheme to demonstrate deforestation-free sources. To deem a raw material sourced as deforestation-free, the acceptable chain of custody models are identity preserved, segregated or site-level mass balance.

Pulp- and paper-based packaging - For pulp- and paper-based packaging volumes we rely on FSC 100% certified material, FSC mixed, FSC Recycled, or PEFC 100% certified to demonstrate deforestation-free sources. While for PEFC mixed, this scheme is only deemed acceptable in combination with further implementation options of our methodology, due to the lack of clarity on the scheme requirements on the conversion of natural ecosystems.

3. Traceable to low-risk origins

When sourced raw materials can be traced back to their sourcing areas at the national, subnational, or regional level, we may rely on national or subnational level risk assessments to demonstrate deforestation-free sourcing. This can be achieved when the sourcing area can be linked to a low or negligible risk of deforestation. Traceability enables the identification of origin, ensuring that raw materials originate from areas without significant deforestation or ecosystem conversion risk, which must be supported by relevant evidence. The risk of deforestation in these areas is determined by the assessed commodity, the complexity of the supply chain, and the granularity of the traceability data. We use a combination of quantitative and qualitative publicly-available data, relying primarily on our collaboration with Maplecroft to carry out the sourcing area risk assessment.

Examples of data used to carry out the assessment are prevalence of forest, deforestation rate, prevalence of forest degradation, proximity to protected areas or areas with high biodiversity value.

Through this approach we assign a risk category to sourcing areas (high risk, low risk, negligible risk). We consider areas with negligible risk to be deforestation-free, and we use categorization to prioritize action for high risk and low risk sourcing areas.

4. EUDR

As of the application of the EU Deforestation Regulation (EUDR), Lindt & Sprüngli must ensure that commodities and products included in the scope of the regulation are sourced and produced according to the regulation requirements. The EUDR mandates that in-scope commodities and products are deforestation-free, have been produced in accordance with the relevant legislation of the country of production and are covered by a due diligence statement. These requirements apply to all in-scope commodities and product sourced by Lindt & Sprüngli's EU-based subsidiaries, as well as to non-EU subsidiaries engaged in activities within the scope of the EUDR.

Commodities and products that are i) in-scope of this guidance document, ii) subject to EUDR requirements, and iii) compliant with EUDR requirements are considered to satisfy the requirements to be considered deforestation-free. EUDR requires that for in-scope commodities and products the following actions are performed:

- 1. Due diligence:** companies shall exercise due diligence in accordance with the EUDR prior to placing relevant products on the EU market or exporting them;
- 2. Information collection:** companies shall collect information, documents and data on volumes and production source, to be able to trace volumes to land plots of production and demonstrate compliance with the EUDR;
- 3. Risk assessment:** companies shall verify and analyze information and documentation to evaluate risk of non-compliance and confirm that no or only a negligible risk at land plot level was found; and
- 4. Risk mitigation:** companies shall adopt adequate risk mitigation procedures and measures to reach no or only a negligible risk.

Compliance requirements for cocoa sourced under EUDR include the following as further specified in the Lindt & Sprüngli EU Deforestation Regulation Policy:

- Supplier due diligence: engagement, EUDR compliance questionnaires and screenings, mitigation actions
- Inbound verification: risk assessment and mitigation informed by geolocation collection and satellite verification for beans and due diligence statements collection and verification for cocoa products

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- Supplier audits, spot checks, ground-truthing

The EUDR only partially covers and affects the raw materials included in this policy. It is one of several possible pathways to work towards eliminating deforestation in supply chains. We deem the requirements from the EUDR and our activities to comply with the EUDR as one key pillar of our no-deforestation approach. Where applicable, these No-Deforestation Guidelines consider the requirements of the EUDR.

Traceability principles

All implementation options described above can be considered valid approaches to determine whether sourced volumes of relevant commodities can be defined as deforestation-free. Regardless of the deforestation-free implementation option(s) leveraged, volumes can only be reported as deforestation-free when it can be guaranteed that supply chain flows respect the principle of segregation, i.e. traceability can be guaranteed throughout the value chain. The following systems are accepted as deforestation-free:

1. Systems that ensure 100% of volume purchased is physically deforestation-free, which can be achieved when:
 - a. the supplier is deforestation-free across their entire business;
 - b. through Identity Preserved (IP), Segregated (SG), or deforestation-free controlled chain of custody models under certification schemes; and/or
 - c. through suppliers' physical segregation of deforestation-free volumes.
2. Systems that inform the percentage known as deforestation-free in a mix (regardless of implementation option adopted) to encourage suppliers to become deforestation-free across their entire business by gradually increasing the percentage of deforestation-free volumes.

Risk mitigation

Supplier engagement

The aim of supplier engagement in the context of deforestation is to ensure that Lindt & Sprüngli sources raw materials from suppliers with deforestation-free control mechanisms that (i) adequately addresses deforestation risks associated with the relevant supply chain and (ii) monitor and guarantee the elimination of deforestation activities associated with the volumes sourced.

Supplier engagement involves building stable partnerships, providing technical support, co-developing action plans, and setting clear expectations around no-deforestation commitments. This approach helps to identify and address risks early, especially in regions where governance is weak or certification coverage is limited. Supplier engagement supports transparency in our supply chains and collaboration with our suppliers. It can be leveraged to mitigate the risks of deforestation by increasing traceability information, increasing data quality and granularity, enabling early detection and response mechanisms and facilitating landscape level solutions.

This approach is most relevant when Lindt & Sprüngli sources from suppliers as a downstream supply chain actor, following complex supply chain upstream, and therefore primary traceability data might be complex to obtain and analyze directly.

Supplier engagement to support the verification of deforestation-free sourcing, refers to processes aiming at collecting information, verifying information, assessing risks and defining mitigation actions in relation to the commodity sourced by a supplier. The process of engaging supplier on deforestation verification, may include a combination of the following requirements:

- Comply with our policies and additional requirements
- Provide traceability of supply chain back to (raw) material sourcing area
- Have a due diligence process, ensuring forestry operations upstream abide by no illegal logging, no deforestation, no impact on High Conservation Values (HCVs) (e.g. protected areas), respect of indigenous land rights
- Share geolocation data of farms/plots/mills (when/as required)
- Cooperate with audits and third-party verification
- Agree on suspension or exclusion in case of deforestation alerts and/or events
- Carry out verification visits of plots to ensure respect to regulation and Lindt & Sprüngli requirements
- Collaborate with third parties and/or participation in joint working group and committees

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The specificities of the requirements and their effectiveness is assessed by Lindt & Sprüngli on a case-specific approach based on the available and documented information and appropriate expertise.

Landscape initiatives

Lindt & Sprüngli engages in landscape-level initiatives, primarily through the Lindt & Sprüngli Farming Program for cocoa, which aim to address deforestation risks by promoting responsible land-use practices across entire cocoa-growing regions. These initiatives may include agroforestry, traceability systems, and certification schemes such as Rainforest Alliance, which are applied not just at the farm level but across broader production landscapes. This approach is particularly relevant because deforestation is a systemic issue that spans multiple farms, ecosystems, and communities, and therefore requires holistic, region-wide solutions rather than isolated interventions. These landscape-level efforts mitigate deforestation risks by reducing the likelihood of illegal land clearing, improving monitoring and compliance with deforestation-free laws, regulations and international standards, and fostering long-term stewardship of environmental resources.

Industry collaborations

Lindt & Sprüngli engages in several industry collaborations aimed at addressing deforestation through collective action and shared accountability. As a signatory to the [Cocoa & Forests Initiative \(CFI\)](#), we aim to contribute to joint efforts with governments and peer companies to eliminate deforestation from cocoa supply chains. Lindt & Sprüngli also considers global frameworks such as the [Glasgow Leaders' Declaration on Forests and Land Use](#), which commits signatories to halt and reverse forest loss by 2030, and participates in dialogues around the [LEAF Coalition](#), a public-private initiative mobilizing finance for large-scale tropical forest protection.

These partnerships enable the company to contribute to shared methodologies, access jurisdictional monitoring tools, and support supplier engagement strategies that go beyond compliance. By participating in these initiatives, Lindt & Sprüngli strengthens its ability to mitigate deforestation risks at scale, improve traceability, and align with evolving regulatory and market expectations.

Monitoring and reporting

Effective monitoring and transparent reporting are essential pillars in mitigating the risk of deforestation in Lindt & Sprüngli's supply chains. Monitoring enables the timely detection of non-compliance, supports continuous improvement, and builds confidence among stakeholders and partners. We monitor our supply chains to detect any cases of non-compliance and provide access to our grievance mechanism through the [Lindt & Sprüngli Speak Up Line](#).

Reporting provides the necessary transparency and accountability to demonstrate progress and uphold commitments. Lindt & Sprüngli publishes regular updates detailing progress towards its no deforestation commitment, including through annual [sustainability statements](#) and, where required, disclosures aligned with regulatory requirements such as the EU Deforestation Regulation (EUDR).

To measure progress against our no deforestation commitment and guide continuous improvement, Lindt & Sprüngli tracks and reports on key performance indicators, in line with leading external frameworks and methodologies (e.g., Accountability Framework Initiative and Consumer Goods Forum Forest Positive Coalition).

For the commodities in scope of our No-Deforestation Policy, we monitor annually the total sourcing volumes, and the volumes that satisfy one or more of the four deforestation-free implementation options described in this document. We will externally report on our progress towards our deforestation free commitment.

Continuous improvement

We commit to continuous improvement by benchmarking our approaches against evolving international best practices, participating in collaborative industry initiatives, and integrating feedback from stakeholders. Through robust monitoring and transparent reporting, Lindt & Sprüngli aims to drive meaningful progress and maintain the integrity of our no deforestation commitment across our global supply chains.