

# Human Rights Policy

of the HARIBO Group

November 20, 2025

Version 1.0

## 1. Preamble

HARIBO is a globally successful company in the confectionery industry. For more than a hundred years, people of all ages have enjoyed our delicious products. Our motto and slogan, "Kids and grown ups love it so, the happy world of HARIBO!" is not just a marketing promise for us, but a commitment to the future in economic, social, and ecological terms.

As a family-owned company, we think in terms of generations. For us, long-term success and social and environmental responsibility are inextricably linked. To be successful in the long-term, it is important to our shareholders and management that these values are integrated into HARIBO's business model.

We presented our principles several years ago in our HARIBO Code of Conduct. They remain valid and are supported and reinforced by this Human Rights Policy.

This policy covers all activities of HARIBO Holding GmbH & Co. KG and all subsidiaries and affiliated companies worldwide.

## 2. Scope

Our principles apply to the entire HARIBO Group – to all employees, managers, business partners, and suppliers. They form the foundation for our approach to human rights and responsible business practices. This policy is communicated internally to all employees and made available on our website.

To implement and comply with these principles, HARIBO has introduced various sets of rules, including the HARIBO Code of Conduct, our Supplier Code of Conduct, and supplementary internal guidelines and procedural instructions. These documents specify our expectations and support the practical implementation of our human rights principles.

## 3. Our commitment to human rights

HARIBO is fully committed to respecting and promoting internationally recognized human rights. In particular, compliance with humane working conditions is never negotiable for us. We acknowledge our responsibility to minimize the impact of our actions on the environment, conserve resources and reduce environmental pollution. What we have in our own hands, we approach ambitiously, worldwide at all locations. We expect the same from our partners.

Our actions are guided by internationally recognized frameworks and standards, which we support unreservedly:

- UN Guiding Principles on Business and Human Rights
- Core labor standards of the International Labor Organization (ILO) and its fundamental principles:
  - Elimination of forced labor
  - Abolition of child labor
  - Prohibition of discrimination in employment and occupation
  - Occupational health and safety
  - Freedom of association and the right to collective bargaining
- OECD Guidelines for Multinational Enterprises
- UN Global Compact and other relevant UN principles

## 4. Principles of the HARIBO- Group

- **Zero-tolerance policy** against any form of forced labor, slavery, slave-like conditions Practices, serfdom, human trafficking, or other forms of domination or oppression in the workplace environment. We are committed to treating all people with respect and fairness – no one should be discriminated against on the basis of their national or ethnic origin, social background, nationality, caste, health status, disability, sexual orientation, age, gender, marital status, political opinion, religion, ideology, or union membership, unless this is absolutely necessary by the requirements of the job.
- **Protection of children and young workers** – Children must be given special protection. We respect children's right to education, play, and development and reject all forms of child labor. Compliance with ILO standards is a matter of course for us.
- **Fair working conditions:** We comply with statutory, collective bargaining, and contractual remuneration and working time regulations. Our wages and salaries comply with the legal provisions of the respective place of work. In doing so, we take into account the local cost of living at the place of employment of the employee and their family members, as well as local social security benefits. All employees receive transparent information on contract terms and remuneration. Local special regulations, e.g. for maternity leave, parental leave, or minimum wage, are always taken into account and, where applicable, implemented beyond international standards.  
In accordance with international labor standards, HARIBO ensures that the respective regular weekly working hours are not exceeded.

- **Health and safety:** Occupational health and safety have the highest priority for us. We consistently comply with all applicable international laws and local occupational health and safety requirements. HARIBO creates safe and healthy working conditions, which are ensured and continuously improved through comprehensive preventive measures.
- **Freedom of association and the right to collective bargaining:** HARIBO respects the right of all employees to freedom of association and collective bargaining. Our employees or their elected employee representatives can engage in open and constructive dialogue with management about working conditions without fear of reprisals.

## 5. Human rights due diligence

As a globally operating company with worldwide production facilities and complex supply chains, it is important to us that we treat human rights and environmental issues with due care in order to avoid risks and violations.

We are continuously working to identify these risks at an early stage, minimize them through appropriate measures, and respond quickly and appropriately in the event of violations. To this end, we have implemented a large number of measures across various business processes.

As part of our comprehensive risk analysis, we systematically identify and assess potential risks. We implement preventive measures in our own business area and with our suppliers, including a code of conduct for suppliers and quality assurance agreements. To maintain our high standards and continuously raise awareness, we implement various measures such as trainings, audits, surveys, and workshops.

We expect our business partners to also commit to respecting human rights and protecting the environment, and to provide HARIBO with appropriate support in fulfilling our legal due diligence obligations. For a social and sustainable value chain, it is essential that our partners disclose transparently how human rights are upheld and continuously work to improve standards.

We recognize the importance of collaboration for the further development of human rights standards. We therefore engage in dialogue with relevant social, political, and economic interest groups, particularly in the context of social and collective bargaining issues.

## 6. Complaint procedure and access to redress

HARIBO encourages all employees, business partners and affected parties to report potential human rights and environmental risks or violations. We have set up an internet-based complaint procedure that allows reports to be made anonymously or by name. The system is available 24/7 (<https://www.haribo.com/en/whistleblowing-system>).

External stakeholders such as communities, NGOs or local partners can also use the system to draw attention to human rights conflicts.

HARIBO will ensure confidentiality when processing reports. The employees responsible for processing reports are independent and not bound by instructions, thus guaranteeing impartiality.

Reports are reviewed according to a structured process and receive transparent feedback. HARIBO guarantees that the report will not lead to any discriminatory measures or negative consequences ("non-retaliation"). Reports are processed in accordance with current legal requirements and may also involve cooperation with external arbitration bodies.

For further information or personal concerns, the Corporate Compliance department can be contacted at [humanrights@HARIBO.com](mailto:humanrights@HARIBO.com).

## 7. Governance

Overall responsibility for respecting human rights lies with the management of HARIBO Holding GmbH & Co. KG and the management of its affiliated companies. The management ensures that human rights due diligence obligations are integrated into our business strategy and decision-making processes.

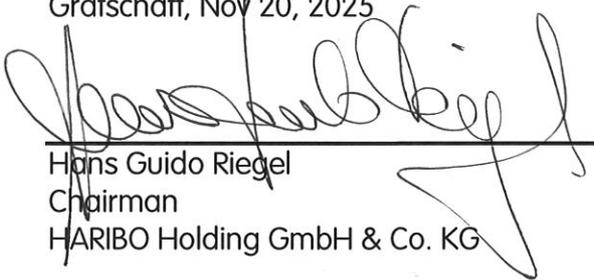
Operational responsibility for implementation lies with the individual business units. These are supported by a Corporate ESG team, which manages appropriate measures and regularly reviews progress. The Human Rights Officer monitors compliance with our human rights obligations and supports the specialist departments in their implementation.

Through regular communication between the management, the relevant departments (including HR, ESG, and purchasing), and the Human Rights Officer, we ensure effective governance, clear responsibilities, and continuous development of our approach to human rights.

## 8. Continuous development

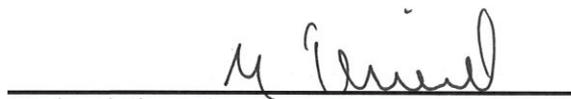
The protection of human rights is a dynamic process that requires constant attention. We continuously review our risk management and business processes, in particular the effectiveness of our preventive or remedial measures and our complaints procedure. We strive to continuously develop our approaches to respecting human rights and environmental concerns and to adapt them to new requirements.

Grafschaft, Nov 20, 2025



---

Hans Guido Riegel  
Chairman  
HARIBO Holding GmbH & Co. KG



---

Michael Phiesel  
Chief Financial Officer  
HARIBO Holding GmbH & Co. KG



---

Markus Riegelein  
Chief Operations Officer  
HARIBO Holding GmbH & Co. KG



---

Herwig Vennekens  
Chief Commercial Officer  
HARIBO Holding GmbH & Co. KG