



## Modern Slavery Statement – 2023

### Introduction

This statement sets out Dunhill's (Pontefract) PLC (referred to in this statement as HARIBO UK) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chain. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024, as well as setting out what it intends to do over the next 12 months.

### About HARIBO UK

HARIBO UK is part of HARBIO Holding GmbH & Co. KG and is the largest sugar confectionery manufacturer with the brands HARIBO and MAOAM. We supply to all the major UK retailers, wholesalers, discounters and foodservice customers. We have 2 manufacturing sites in the West Yorkshire region of the UK and 10 retail stores in the UK, with 730 colleagues and at most 30 additional temporary workers at peak holiday times to ensure we maintain efficient productivity and maintain a positive work-life balance for our colleagues.

As part of the Sugar Confectionery Manufacturing supply chain, HARIBO UK recognises that it has a responsibility to take a robust approach to slavery and human trafficking. HARIBO UK is absolutely committed to preventing any form of slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

HARIBO UK continues to measure our performance through key performance indicators (KPIs) as below:

- Requiring all staff to complete training on Stronger Together during their induction.
- Complying with the ETI base code for all staff, including our on-site catering, hygiene and security labour providers.
- Committed to ensuring that all our first level suppliers are linked to us on SEDEX and have a valid audit when required.

## High Risk Activities

The following activities are considered to be at high risk of slavery or human trafficking:

1. As a food manufacturer, the industry is known to have a heavy reliance on temporary agency labour. We continue to have a minimal number of colleagues on this form of contract and therefore our risk is greatly reduced, we appreciate that this will be a common issue to other organisations within our supply chain.
2. Raw Materials and packaging where farming or mining exists (Gelatine, Sugar, Glucose, Palm Oil as examples) are known to be at risk from the use of slavery. Our Group Procurement team ensure that suppliers are selected based on their suitability and historical performance. All suppliers are encouraged to register with SEDEX and are required to sign up to the group managed Supplier Code of Conduct.
3. Reports show that Modern Slavery within the construction industry is high risk. We only use reputable contractors all of whom go through an approval process managed by the Operations and Procurement teams.

## Risk Assessment

The risk of slavery and human trafficking within our organisation we believe is mitigated as a result of strict policies and good practices within our operations and the knowledge and skills of our colleagues.

Good Practices already embedded within our UK's sites include:

- **Stronger Together**
  - Stronger Together awareness carried out by all HR colleagues.
  - Procurement colleagues' attendance at Stronger Together workshops.
  - Posters displayed on all sites.
- **Recruitment/Agency workers**
  - HARIBO UK use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
  - All agencies that supply to us hold the appropriate GLAA licence.
  - All workers via agency are paid at the correct rate of pay for the role that they are contracted to carry out.
- **SMETA**
  - Haribo Holding GmbH & Co. KG has made a commitment that all its manufacturing sites will have an ethical audit.

- The UK's audit took place June 2023 which resulted in a successful outcome for both of our sites, reflecting our commitment to ethical and responsible business practices. Following this successful audit, a full review has taken, and an agreed action plan put in place to maintain our momentum and to continue to prioritise compliance in our operations. All agreed actions have been completed.
- Our next Audit is scheduled to take place in March 2026.

- **Colleagues**

- HARIBO UK have a long established Recognition Agreement with the GMB Union which covers both manufacturing sites. HARIBO UK and the GMB Union are committed to proactively working together on the issues of Modern Slavery and human trafficking.
- All Colleagues and those connected to the Company (e.g. contractors / agency labour) are expected to work with integrity and respect for each other to maintain the positive employee relations which exists at HARIBO UK.
- Colleagues are free to raise any issues of concern direct to their line manager, via our established Employee Council or through their Trade Union Representative.
- We have an Employee Council in place to encourage all our colleagues to feel that they have a voice and can be heard.
- We regularly participate in Global Engagement Surveys and follow up with the development of relevant action plans which are implemented to ensure that all functions have established action plans in place. The latest Global Engagement Survey took place in 2022, with the next one planned for 2025.
- In addition to any Global Engagement Surveys, we also carry out annual Pulse Engagement Surveys in the UK and Ireland, following which action plans are created and implemented across all functions.

The standards set out above are under the responsibility of the HR Director.

We consider the greatest risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

Through our Supplier Code of conduct HARIBO UK is committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and

within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the agreement and improve their worker's working conditions.

However, serious violations of our Supplier Code of conduct may lead to the termination of the business relationship. Suppliers are expected to be members of SEDEX and show full visibility of any ethical audits.

### **Due Diligence**

Global and UK Procurement Teams within HARIBO Holding GmbH & Co. KG undertake a due diligence exercise when considering taking on new suppliers, and regularly reviews its existing suppliers. Due diligence activities include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- Ensuring new suppliers are signed up to our SMETA Declaration.
- Conducting supplier audits or assessments through SEDEX or SMETA Code of Conduct (depending on the supplier being Global or Local), which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through SEDEX or SMETA Code of Conduct (depending on the supplier being Global or Local) and requiring them to implement action plans.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular such as participation in "Stronger together".
- Using SEDEX website and the SMETA Code of Conduct, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### **Training and Awareness**

- We continue to support our colleagues by providing training on Stronger Together during induction and taking the opportunity to raise awareness and the importance of demonstrating integrity and respect to fellow colleagues.
- Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within HARIBO UK;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;

### **Board Member Approval**

This statement has been approved by the Company's Board of Directors, who will review and update it accordingly.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

### **Next steps to prevent modern slavery in HARIBO UK and our supply chain**

We continually review our efforts in this area; we recognise that this is a complex area that requires continuous improvement to ensure we mitigate the risk of modern slavery in our business. During 2024 and 2025 we will be taking the following steps to improve our approach to mitigating the risk of modern slavery in our business and supply chain:

- Continue with general awareness raising for all colleagues.
- Working closely with the relevant areas of our business to ensure that where potential modern slavery risks, issues or queries are identified through customer audits or other external audits (e.g. SEDEX SMETA), these issues or queries are resolved and trends and training needs are highlighted.
- Continuing the work to create awareness of correct procurement behaviour and adapting our internal ways of working to allow for increased compliance to minimise the risks of modern slavery.

Jon Hughes, Managing Director of Dunhill's (Pontefract) PLC  
West Yorkshire, March 2024

