

Declaration of principles

of the HARIBO Group

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English version

1. Preamble

HARIBO is a globally successful company in the confectionery industry. People of all ages have been enjoying our delicious products for more than a hundred years. 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 business, we think in terms of generations. For us, long-term success and the assumption of social and ecological responsibility are inextricably linked. To be successful in the long term, it is important to the shareholders and management to integrate these attitudes into HARIBO's business model.

We presented our principles several years ago in our HARIBO Code of Conduct. They still apply valid and are supported by this declaration of principles.

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

2. Respect for human rights & environmental concerns

We expect transparency and strict compliance with social and environmental standards from our suppliers and their upstream suppliers. 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 based on internationally recognized frameworks and standards and we support them unreservedly:

- United Nations Guiding Principles on Business and Human Rights
- Core labor standards of the International Labor Organization (ILO) and their basic principles:
 - Elimination of forced labor
 - Protection of children and young workers
 - Free choice of employment
 - 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

- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

3. Human rights and environmental risk management

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

We have been working for years to identify these risks at an early stage, minimize them by taking appropriate measures to prevent breaches, and respond to any issues quickly and appropriately. To this end, we have already a large number of measures across various business processes in place.

For example, we have appointed an independent human rights officer to monitor human rights and environmental risk management. She will inform the management of their work at least once a year as well as make suggestions for improvement where necessary.

The documentation of compliance with human rights and environmental due diligence obligations is continuous and decentralized and is kept by HARIBO for seven years from the date of its creation.

4. Risk analysis

As part of an overarching risk analysis, we will systematically consider potential risks in 2024, using the comprehensive range of solutions offered by the EcoVadis Sustainability Rating platform. We will consider both abstract risks (risk disposition by country and sector) and carry out risk-based concrete risk analyses. We will also evaluate and prioritize identified risks and derive appropriate preventive and, if necessary, remedial measures for our own business area and our supply chain.

All of our relevant decision-makers are kept informed about the results of the risk analysis. As soon as the results of our analyses are available, we will adapt this policy statement and report on priority risks.

5. Preventive and remedial measures

At HARIBO, we have been implementing various preventive measures in our own business area and vis-à-vis direct suppliers for years:

- Our HARIBO Code of Conduct describes our principles of behavior and applies to all employees worldwide.
- To prevent the risk of accidents at work or work-related health risks, we have established measures to ensure health and safety in the workplace for occupational health and safety.
- Since 2015, we have been audited in accordance with the internationally recognized SMETA standard (Sedex Members Ethical Trade Audit). We aim to have all production sites audited in accordance with SMETA by the end of 2024.
- The protection of human rights and the environment is an integral part of the purchasing process, which we have integrated into our purchasing guidelines:
 - Our supplier Code of Conduct lays out our principles of conduct towards suppliers. It also contains appropriate contractual control mechanisms and agreements on their risk-based implementation.
 - We also carry out quality assurance agreements for raw materials and packaging materials in particular.
 - The selection and monitoring of suppliers with regard to our human rights and environmental expectations is carried out by our purchasing departments with the support of the Corporate Responsibility department.

We will continue to promote the importance of respect for human rights and environmental protection with both our own employees and our business partners, including by offering appropriate training.

In the event of (imminent) violations of protected legal positions, HARIBO will take appropriate remedial action without delay. Clear processes with unambiguous responsibilities are defined for this purpose. At HARIBO, we have stated the requirements for cooperation with direct suppliers in the Supplier Code of Conduct.

We also immediately follow up on indications of violations with indirect suppliers. If these indications are substantiated, we implement appropriate measures to prevent, end or minimize the violation.

HARIBO strives to continuously optimize the processes and responsibilities already established, to adapt them to new requirements where necessary and to supplement them with additional measures if required.

6. Complaints procedure

HARIBO encourages its employees and business partners to report any activities that indicate a violation of applicable laws or our Supplier Code of Conduct, or any that are inconsistent with ethical business practices. This includes indirect suppliers and their employees, as well as those who are affected by our business activities.

We have set up a complaints procedure that enables employees and affected persons to report any human rights and environmental risks and violations that may have arisen as a result of HARIBO's business activities or in our supply chain.

HARIBO provides the following reporting channels for reporting these matters:

- E-mail address humanrights@haribo.com for personal contact with the Corporate Compliance department of the HARIBO Group.
- Internet-based reporting system for submitting written reports, including the option of anonymous reports. Further information can be found at <https://www.haribo.com/de-de/hinweisgebersystem>. The corresponding rules of procedure are available on the website.
- HARIBO will ensure confidentiality when processing the reports. The employees entrusted with the processing of the reports are independent and not bound by instructions, so offer a guarantee of impartial action.

7. Documentation and reporting

Based on the documentation, HARIBO will fulfill all applicable reporting obligations in a timely manner, with support and coordination from our Human Rights Officer.

8. Further development of our risk management

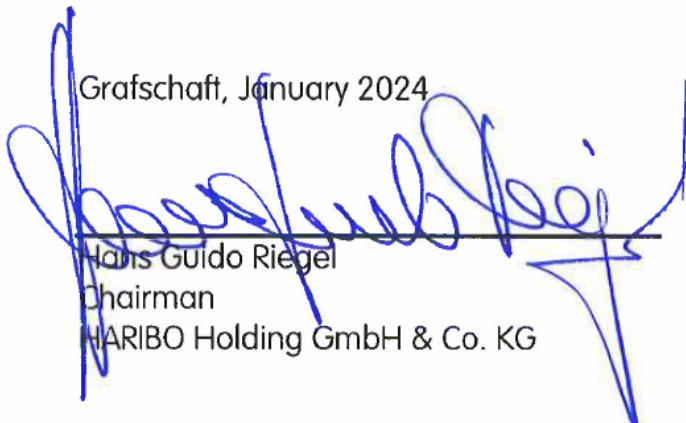
We will continuously review our risk management and our corporate processes, in particular the effectiveness of our preventive measures, remedial measures and complaints procedure. We will also consider the results of the risk analysis in detail and work continuously on the further development of our approaches to respecting human rights and environmental concerns.

9. Human rights and environmental expectations


The fight against forced and child labor has always been of particular concern to HARIBO. We pursue a zero-tolerance policy against any form of forced labor and reject any form of child labor, forced labor or slave-like practices. Freedom of association and the right to humane treatment in the workplace are also fundamental to our principles, including compliance with legally prescribed or contractually agreed remuneration and working time regulations. These expectations are firmly anchored in our Code of Conduct.

We also expect our business partners to commit to respecting human rights and protecting the environment and to support HARIBO appropriately in fulfilling our legal due diligence obligations. We expect our business partners to appropriately address compliance with these expectations along their supply chain. In addition to this declaration, we have therefore also incorporated our expectations in our Supplier Code of Conduct, which is part of our contractual agreement with suppliers.

Grafschaft, January 2024



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