



# Modern Slavery Statement – 2025

## 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 2025 to 31 March 2026, as well as setting out what it intends to do over the next 9 months. The Company's financial year runs from 1 January to 31 December. Future statements will be aligned to the financial year in accordance with UK Modern Slavery Act requirements.

## About HARIBO UK

HARIBO UK is part of HARIBO Group and is the largest sugar confectionery manufacturer with the brands HARIBO and MAOAM. HARIBO Group places strict requirements on its suppliers which are mainly located in Europe. Suppliers must comply with international conventions and standards, particularly regarding human rights, and must prevent bribery, corruption, forced labour, and child labour. These expectations are set out in the HARIBO Groups Supplier Code of Conduct.

HARIBO UK supplies all the major UK retailers, wholesalers, discounters and foodservice customers. We have 2 manufacturing sites in the West Yorkshire region of the UK and 13 retail stores in the UK, with 812 colleagues and at most 32 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.

## Our commitment to human rights

HARIBO Group 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 minimise 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 recognised frameworks and standards, which we support unreservedly:

- UN Guiding Principles on Business and Human Rights
- Core labour standards of the International Labor Organization (ILO) and its fundamental principles:
  - Elimination of forced labour
  - 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

In 2025, the HARIBO Group adopted a comprehensive Human Rights Policy applicable to all subsidiaries worldwide, including HARIBO UK. This policy further strengthens our commitment to human rights, clarifies responsibilities, and aligns our practices with international standards such as the UNGPs, ILO conventions, and OECD guidelines.

#### Principles of the HARIBO-Group

- Zero-tolerance policy against any form of forced labour, 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 labour. 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 labour 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.

To ensure effective implementation, the HARIBO Group has established a governance structure that includes a designated Human Rights Officer and a Corporate ESG Team. HARIBO UK is fully integrated into this structure and follows group-wide processes for monitoring, reporting, and escalation.

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

- 100% of new starters completed modern slavery training.
- Complying with the ETI base code for all staff, including our on-site catering, hygiene and security labour providers.
- We are committed to proactively identifying and managing modern slavery risks through comprehensive pre-onboarding due diligence across all Tier 1 suppliers, underpinned by enforceable standards and continuous risk monitoring.
- No modern slavery incidents identified

#### 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. Our supply chain includes raw material suppliers (e.g. gelatine, sugar, palm oil), packaging providers, logistics partners and labour providers, primarily located in the UK and Europe, with certain agricultural commodities originating from higher-risk regions further upstream in the supply chain. Our Group Procurement team is part of our group-wide human rights due diligence system and focuses on monitoring, supplier dialogue and compliance with the HARIBO Group's standards. This ensures that suppliers are selected based on their suitability and historical performance. Suppliers are expected to adhere to the Group Supplier Code of Conduct and are encouraged to formally acknowledge and sign it.

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.
  - Information notices displayed at 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 and have signed our Supplier Code of Conduct
  - All workers via agency are paid at the correct rate of pay for the role that they are contracted to carry out.
- **SMETA**
  - All of our manufacturing sites are regularly audited against the SMETA framework, including business ethics.
  - The UK's audit took place in 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 February 2027.
- **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 May 2026.
- 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 People Director.

- **Supply Chain Risks**

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.

### **Due Diligence**

As a global manufacturing 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. Most suppliers are based in the UK and EU and are subject to local labour laws.

We are continuously working to identify these risks at an early stage, minimise them through appropriate measures, and respond quickly and appropriately in the event of violations. To this end, we have implemented several 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.

HARIBO UK conducted a risk-based assessment of its first level (Tier 1) UK suppliers. Selected suppliers were subjected to more detailed screening to verify compliance with the HARIBO Group's requirements and relevant human rights standards.

For global suppliers, the HARIBO Group carried out enhanced due diligence measures as part of its group-wide human rights program. These measures included in-depth assessments using supplier location, sector, labour model, and audit data to prioritise higher-risk suppliers. Selected Tier 1 and Tier 2 suppliers were risk assessed and focused on labour practices, working conditions, and compliance with the Supplier Code of Conduct.

No material findings were identified during these reviews. HARIBO UK will continue to monitor suppliers in cooperation with the HARIBO Group's purchasing and compliance function, ensuring follow-up where needed and ongoing verification of compliance.

### **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.

### **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. Concerns can be raised through our internet-based complaint procedure that allows reports to be made anonymously or by name. The system is available 24/7 in multiple languages (<https://www.haribo.com/en/whistleblowing-system>) and details can be found on the public facing company website see [link](#). The system is communicated to colleagues and key suppliers to support accessibility. 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"). Where concerns are identified, these are processed in accordance with current legal requirements and follow a structured escalation process, working with suppliers to implement corrective action plans. We prioritise the safety and wellbeing of affected individuals and, where appropriate, engage external specialist organisations or external arbitration bodies. We do not adopt a zero-tolerance approach that results in immediate disengagement but instead prioritise remediation and improvement unless severe breaches persist.

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

**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 published in a prominent location on our website homepage in accordance with section 54 requirements.

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 2026 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.

Philip Murphy, Managing Director of Dunhill's (Pontefract) PLC  
West Yorkshire, June 2026