



HARIBO

Statement in relation to the Transparency Act – HARIBO Lakris AS, 2022

HARIBO Lakris AS is a trading company located at Høvik in Bærum Kommune. The company's business idea and strategy are to be a leader in the categories of fruit gum, licorice and foam of high quality in the grocery industry in Norway. Most of the products sold are produced in Denmark, but others are produced in Germany, Belgium and Spain.

HARIBO Lakris AS, is established in 1989 and is part of the international HARIBO Group (Germany).

Anchoring accountability

HARIBO Group takes its corporate responsibility very seriously. It is the belief of the company that respect for both people and the planet plays an important role to develop the business successfully. HARIBO have therefore implemented several policies for the area, which are integrated in the daily work. In 2022, the company also continues the work on many different projects on a group level.

The focus is **Food Safety**, as our consumers at any time should be able to enjoy our products without any risk. The HARIBO Group therefore applies high food safety, quality, and ethical standards to the selection of all raw material and packaging used in the production of our beloved products. Since 2017, all the HARIBO Group manufacturing facilities have been certified according to FSSC 22000 (Food Safety System Certification), a GFSI (Global Food Safety Initiative) recognized standard with an excellent reputation in the food industry worldwide.

In 2019 HARIBO Group implemented a global **Code of Conduct and whistleblower system**. The Code of conduct ensure among other things anti-corruption, personal data privacy and combating money laundry. The Whistleblower system gives consumers, suppliers, customers and employees the opportunity to draw attention to possible legal violations to allow HARIBO to respond quickly and work to counteract any incorrect actions taken. Anyone identifying a possible legal violation in any part of the company's activities can report their observations in their own language – anonymously and confidentially.

HARIBO recognize **data ethic** as an important area. We are committed to ensure that especially personal data are handled in a safe way. HARIBO have hardly any consumer data, so data ethics is not considered a high-risk area.

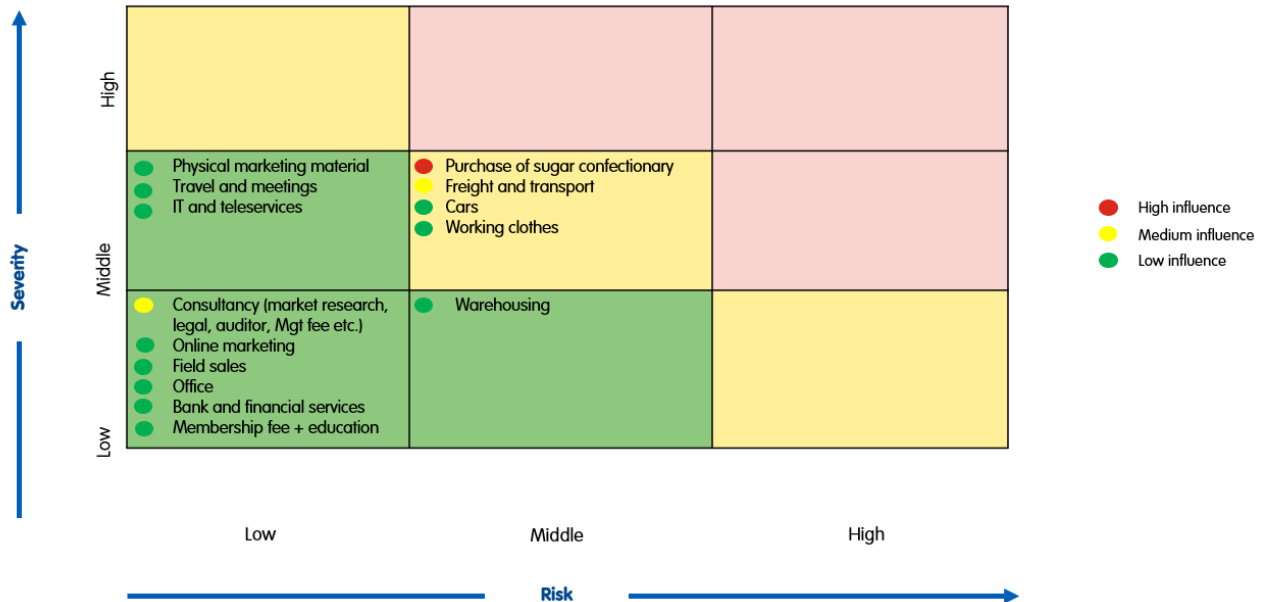
As protection of personal data is very important for HARIBO, we have in 2021 put additional focus to GDPR. The overall aim of the focus was to increase the awareness in the organization, this includes among other things mapping of GDPR processes and training of the employees. In 2022 we continue the focus on data ethic including GDPR, ensuring that all employees have online training.



Due Diligence process and risk assessment

The purchase process and risk assessment of vendors and sub vendors are essential in order to improve the respect for basic human right and decent working conditions. In 2022 HARIBO Lakris AS have performed a due diligence of its vendors and supply chain. The Due diligence is based on the “OECD Due Diligence guidance for Responsible Business Conduct”. Initially all vendors have been grouped by the type of products that are purchased. Each group have then been graded in low, middle, high, based on the risk that the purchased product, have a risk of violating humans right, including workers and industrial relations, environment, bribery and corruption, disclosure, and consumer interest. Secondly the purchased product has been grouped in relation to the severity that the violation is expected to have, and thirdly it is group to the influence, based on how big the purchase is in value.

The mapping is shown in below chart.



As the responsibility of HARIBO Lakris AS is solely selling sugar confectionary in Norway and employee only 3 FTE’s, the direct influence is in general considered limited. Purchase of sugar confectionary is considered to have the highest influence due to the share of the purchase in HARIBO Lakris AS. The sugar confectionary purchased by HARIBO Lakris AS is primarily coming from associated companies in Denmark, but also associated companies in Germany, Belgium and Spain. As this is all European countries and all within the same standard in HARIBO, the risk is considered low for violation in this step. The HARIBO Group mainly get its raw materials from European vendors, however as we are aware that raw material often comes from subcontractors, The HARIBO Group makes high demand on its suppliers. It is required that the vendors ensure that raw materials are produced with respect for international conventions and standards, with a special focus on following the current Human Rights Conventions along with avoiding any form of bribery, corruption, forced labor and child labor. All vendors of raw material need to sign a



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declaration to declare that these demands are met. This declaration is a HARIBO Group Standard. All raw material vendors used in 2022 have declared that they are following the declaration.

The Danish production site, which are the biggest provider to HARIBO Lakris AS is FSSC 22000 certified, which ensures that the consumers get a product of the highest quality and safety, which can be consumed. Most production site are also SMETA certified or in the process of being SMETA certified. This certification includes both labor standards, business ethics standards, health and safety standards as well as environmental standards.

However, there is always a risk that ethic codes relating to human rights, anti-bribery, corruption and child labor are not met outside of HARIBO's control.

For the coming years we will continue having focus on ensuring that suppliers meet our requirements. The production site within the HARIBO will continue to demand that the HARIBO Group standard are followed by all the vendors. Also review of vendors will be performed every second year.

Bærum 30th Jun 2023

The board of HARIBO Lakris AS

Stefano Franzoia

Fred Kallentin