



HARIBO

Statement in relation to the Transparency Act – HARIBO Lakris AS, 2023

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 sold products are produced in Denmark, the rest is sourced from Germany, Belgium and Spain.

HARIBO Lakris AS was established in 1989 and is part of the international HARIBO Group based in Germany.

Anchoring accountability

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.

HARIBO has therefore implemented several policies in those areas, which are integrated in the daily work and in 2023 also continued to work on several specific projects at the group level.

The focus is on **Food Safety**, to ensure that consumers at any time can enjoy the HARIBO 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. Before 2017, HARIBO Group was certified according to the international food standard IFS.

In 2023 the work to ensure SMETA certification continued. This certification includes standards regarding labor, business ethics, health, safety and environment. Most HARIBO Group manufacturers are by now compliant with the SMETA standards, with the rest working to fill remaining gaps to full compliance.

In 2019 HARIBO Group implemented a global **Code of Conduct and a whistleblower system**. The Code of Conduct defines how HARIBO aims to conduct globally in all local companies and at all employee and management levels. The Code of Conduct contains regulations regarding corruption, handling company property, product safety or financial integrity, as well as rules of conduct related to combating money laundering or handling confidential business information.



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The Whistleblower system gives employees, suppliers, customers and other third parties the opportunity to draw attention to possible misconduct 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.

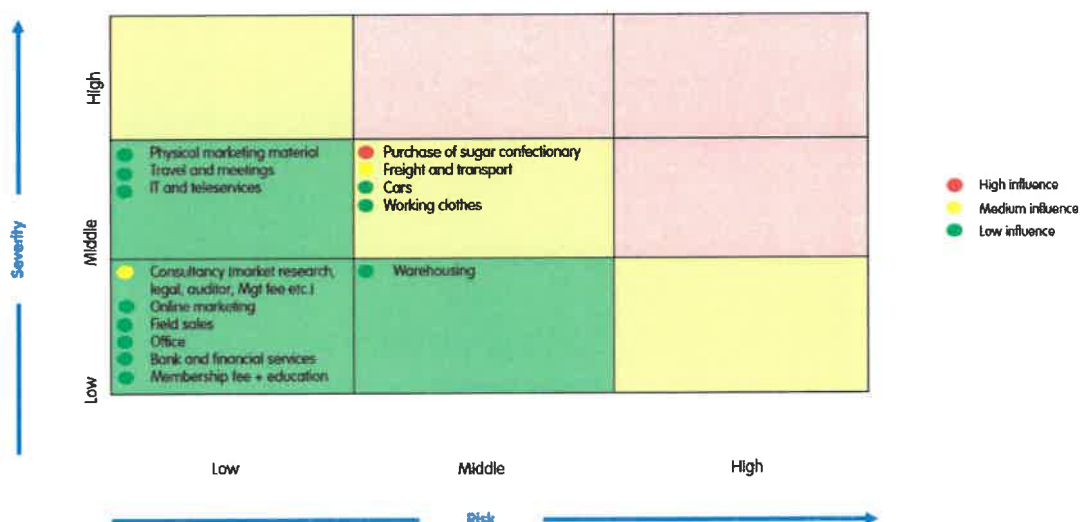
HARIBO recognize **data ethic** as an important area. The company is committed to ensure that especially personal data are handled in a safe way. HARIBO handles hardly any consumer data, so data ethics is not considered a high-risk area.

As protection of personal data is very important for HARIBO, there has been an additional focus on GDPR since 2021. The overall aim is to increase the awareness in the organization, including among other things a mapping of GDPR processes and training of the employees. In 2023 the focus remained 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 to improve the respect for basic human rights and decent working conditions. In 2022 HARIBO Lakris AS have performed a due diligence of its supply chain and individual vendors. The Due diligence is based on the “OECD Due Diligence guidance for Responsible Business Conduct”.

Initially all vendors were grouped by the type of purchased products. Each group was then (based on the product) ranked as low, middle or high risk of human rights violations, including workers and industrial relations, environment, bribery and corruption, disclosure, and consumer interests. The purchased products were then again ranked in terms of the expected severity of a possible violation and finally according to the influence HARIBO should have on the respective supply chain and vendors, based on the magnitude of its purchases in value. The due diligence has been revised in 2023, not leading to any changes. The mapping is shown in the chart below:





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In 2023 HARIBO Group have again started to map all its direct as well as indirect suppliers with the aim of performing a Supply Chain Due Diligence as well as to prepare for the EU Supply Chain Act.

As the responsibility of HARIBO Lakris AS is solely selling sugar confectionary in Norway and employes only 3 FTE's, its direct influence on the supply chain is in general considered limited. The purchase of sugar confectionary is considered to have the highest influence on respective vendors due to the share of the purchase value in HARIBO Lakris AS. As all sugar confectionary purchased by HARIBO Lakris AS is coming from associated companies in Denmark, Germany, Belgium and Spain which meet the same HARIBO standard, the risk of non-compliance is classified as low.

The HARIBO Group sources its raw materials mainly from European vendors. HARIBO places high demands on its suppliers: HARIBO expects suppliers to ensure that raw materials are produced in compliance with international conventions and standards, with a particular focus on compliance with current human rights conventions and the avoidance of all forms of bribery, corruption, forced labor and child labor. All suppliers are expected to sign the Group-wide Supplier Code of Conduct and a quality assurance agreement. All raw material vendors used in 2023 have declared that they are following those standards. Sample tests are performed by the central purchasing company of the HARIBO Group to ensure that safe guards are followed.

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 HARIBO Lakris AS as well as the HARIBO Group will continue having focus on ensuring that suppliers meet our requirements. The production sites within the HARIBO Group will continue to demand that the HARIBO Group standards are followed by all vendors. Reviews of vendors will be performed every second year.

Bærum 30th Jun 2024

The board of HARIBO Lakris AS

Stefano Franzoia

Christian Cerlienco