



HARIBO

Statement in relation to the Transparency Act – HARIBO Lakris AS, 2025

HARIBO Lakris AS (851 715 142) 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. HARIBO Lakris AS was established in 1989 and is a subsidiary of the international HARIBO Group based in Germany.

Most of the sold products are produced in Denmark, but some are produced at HARIBO production sites in Germany, Belgium, Spain and Hungary.

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 labor, and child labor. These expectations are set out in the HARIBO Groups Supplier Code of Conduct.

HARIBO Lakris AS is a sales and distribution company with 3 employees and does not conduct its own production. As in previous years, this limits the company's direct influence on the supply chain. The company therefore relies on the group-wide human rights due diligence system and focuses on monitoring, supplier dialogue and compliance with the HARIBO Group's standards. This approach is consistent with the Transparency Act requirement to adapt due diligence to the company's size, nature and risk profile.

Our commitment to human rights

HARIBO 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 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 guided by internationally recognized frameworks and standards, which we support unreservedly:

- UN Guiding Principles on Business and Human Rights
- Core labor standards of the International Labor Organization (ILO) and its fundamental principles:
 - Elimination of forced labor
 - Abolition of child labor
 - 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
- 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 Lakris AS. This policy and our commitment to human rights clarifies responsibilities and aligns our practices with international standards such as the UNGPs, ILO conventions, and OECD guidelines.



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Principles of the HARIBO- Group

- Zero-tolerance policy against any form of forced labor, 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 rights to education, play, and development and reject all forms of child labor. 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 labor 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 Lakris AS is fully integrated into this structure and follows group-wide processes for monitoring, reporting, and escalation.



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Human rights due diligence

As a globally operating 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 in the EU and are subject to local labor laws.

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

We recognize the importance of collaboration for the further development of human rights standards. We therefore engage in dialogue with relevant social, political, and economic interest groups, particularly in the context of social and collective bargaining issues.

The main potential risks relate to agricultural raw materials, which globally may involve risks regarding working conditions. Packaging materials and transportation activities represent additional low-level risks. Based on supplier locations (EU) and the HARIBO Group's standards, the overall risk level for HARIBO Lakris AS is assessed as low.

Results and Follow-up

HARIBO Lakris AS conducted a risk-based assessment of its direct Nordic 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 and audits conducted at selected Tier 1 and Tier 2 suppliers, focusing on labor practices, working conditions, and compliance with the Supplier Code of Conduct.

No material findings were identified during these reviews. HARIBO Lakris AS 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.



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. We have set up an internet-based complaint procedure that allows reports to be made anonymously or by name. The system is available 24/7 (<https://www.haribo.com/en/whistleblowing-system>).

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"). Reports are processed in accordance with current legal requirements and may also involve cooperation with external arbitration bodies.


For further information or personal concerns, the Corporate Compliance department can be contacted at humanrights@HARIBO.com.

Continuous development

The protection of human rights is a dynamic process that requires constant attention. We continuously review our risk management and business processes, in particular the effectiveness of our preventive or remedial measures and our complaints procedure. We strive to continuously develop our approaches to respecting human rights and environmental concerns and to adapt them to new requirements.

Copenhagen, 25 March 2026

The board of HARIBO Lakris AS


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Stefano Franzoia


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Dr. Fabio Mann