

LINDT & SPRÜNGLI UK LTD

Modern Slavery Act Statement

Lindt & Sprüngli (UK) Limited strongly condemns human trafficking and slavery and remains committed to ensuring that our supply chains are free from any form of modern slavery.

This statement has been prepared in accordance with section 54 of the UK's Modern Slavery Act 2015. It sets out the steps taken by Lindt & Sprüngli (UK) Limited to prevent modern slavery and human trafficking in our business and supply chains.

Our business and supply chains

Lindt & Sprüngli UK is a fully owned subsidiary of the Lindt & Sprüngli Group. The Lindt & Sprüngli Group is globally active in developing, producing and selling chocolate products in the premium quality segment. With its extensive and innovative global and local range of finest quality chocolate, it is present in around 120 countries worldwide. Lindt & Sprüngli is committed to managing sustainability impacts that emerge from its operations along the entire value chain (sourced, produced and consumed). We report on an annual basis about the progress made with regards to corporate sustainability; the report is published on the Corporate Website to provide stakeholders with comprehensive information about Lindt & Sprüngli's goals, measures and progress made.

Our policies

We operate a number of <u>policies</u> to ensure that we are conducting business in an ethical and transparent manner. These include:

- The <u>Lindt & Sprüngli Supplier Code of Conduct</u> which requires all of our suppliers to comply with applicable national and international laws and regulations, including those related to human trafficking and slavery, and including the International Labour Organisation and the United Nations' Universal Declaration of Human Rights.
- The <u>Lindt & Sprüngli Business Code of Conduct</u> which ensures all members of management, supervisors and employees demonstrate a level of professionalism and maintain high ethical standards when conducting business and when dealing with customers, suppliers and the general community.
- Our Equal Opportunity Employment policy which is applied to the recruitment and subsequent employment of all employees at Lindt & Sprüngli UK Ltd.
- Our Whistleblowing policy which ensures all employees at Lindt & Sprüngli UK Ltd know that they
 can raise concerns about practices within our business or supply chain, or how colleagues are being
 treated, without fear of reprisals.

Due diligence of suppliers and supply chain

We regularly assess risks of non-compliance with our Supplier Code of Conduct, or ask a third party to assess the risks in specific supply chains. Where necessary, we implement concrete programs to support suppliers in reaching and maintaining compliance with the standards we require.

Audits

Under our Supplier Code of Conduct, we reserve the right to conduct (or have a third party conduct) audits of suppliers and their facilities to verify compliance with our Supplier Code of Conduct. Suppliers we define "at risk" for non-compliance with any aspect of our Code, including the requirements related to human trafficking and slavery, are subject to assessments, audits and/or verification visits by independent parties.

In certain programs, we also have internal monitoring/control systems in place, covering a wider range of suppliers (up to 100% of suppliers for certain supply chains). Examples are: China Supplier Development Program; Lindt & Sprüngli Farming Program for cocoa beans from Ghana, Ecuador and Madagascar; Hazelnut suppliers/farmers in Turkey; and palm oil suppliers.

Supplier certifications

Our Supplier Code of Conduct also requires suppliers to sign a <u>Compliance Declaration</u>, stating that they: (1) have received and commit to fully comply with our Supplier Code of Conduct and its principles and requirements; (2) agree that we or a third party may carry out periodic, audits on their facilities; and (3) will communicate effectively the contents of the Code to their employees, agents, subcontractors and suppliers and ensure all measures required are implemented accordingly. Failure to comply may result in Lindt & Sprüngli ceasing to do business with offending suppliers.

Employee accountability

All Lindt & Sprüngli employees are required to adhere to our <u>Business Code of Conduct</u>, which includes compliance with all laws and regulations. The CEOs of the Lindt & Sprüngli Group companies are responsible for ensuring that employees are informed and educated about the Business Code of Conduct.

Furthermore, the CEOs are expected to enforce strict adherence to the rules and regulations of the policy. Our disciplinary policy permits a range of measures, from corrective actions up to termination of relationships with employees involved in any similar misconduct. All employees are expected to report any suspicion or knowledge they may have of any slavery or human trafficking in any part of the business, and we have a whistleblowing policy in place at Lindt & Sprüngli UK Ltd to encourage this.

Training

Relevant employees, and suppliers (up to farmer level) receive regular training on our Supplier Code of Conduct, including the relevant portions relating to human trafficking and slavery, as exemplified in our <u>Lindt & Sprüngli Farming Program in Ghana</u>. Our employees at Lindt & Sprüngli UK Ltd complete an on-line assessment to check their understanding of our Business Code of Conduct and training is given where employees do not meet the required level of understanding.

Performance indicators

We will be able to measure the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking does not take place within our business or supply chain by:

- supporting suppliers in reducing risks;
- the completion of audits;
- the use of issue/grievance reporting mechanisms;
- requiring suppliers to sign Compliance Declarations;
- requiring relevant employees to undertake training;
- ensuring our Codes of Conduct and other relevant policies and practices are reviewed and updated regularly and communicated clearly to all employees and suppliers

Approval

This statement was approved by the Board of Directors on 30th June 2017

Name (director): Dr. Dieter Weisskopf

Signature: