

Humble Group

Modern Slavery Statement 2024

Introduction

At Humble Group, we are committed to upholding human rights and eliminating modern slavery, including forced and child labor, throughout our operations and supply chain. Our [Human Rights Policy](#) as well as our [Supplier Code of Conduct](#) are based on the Universal Declaration of Human Rights and the ILO principles and serve as the foundation for our efforts. Humble Group AB is a signatory of the UN Global Compact and its Ten Principles, including that we support and protect internationally proclaimed human rights and ensure that we are not complicit in human rights abuses.

Modern slavery is a serious human rights violation that encompasses a wide spectrum of crime, including forced labor, child labor, human trafficking, slavery and servitude. The term refers to the illegal exploitation of people for personal or commercial gain where a person cannot leave due to coercion, use of force, abuse of vulnerability, deception or other means. As a player in the Fast-Moving Consumer Goods (FMCG) industry, Humble Group is inherently exposed to certain modern slavery risks due to the nature of our supply chains.

This statement outlines our initiatives and actions in 2023 regarding efforts to combat modern slavery within our business and supply chain and is provided to comply with the UK Modern Slavery Act.

Our organization & structure

Humble Group is a Swedish FMCG group that encompasses a variety of manufacturers, distributors, and renowned consumer brands, dedicated to the development, refinement, and global distribution of fast-moving consumer products. Humble Group includes over 47 entities which operate across four business segments – Future Snacking, Quality Nutrition, Sustainable Care, and Nordic Distribution. Humble Group has its own operations in 13 countries with over 1000 employees and a global sales presence across 118 markets. Our net turnover in 2023 amounted to over 7 billion SEK.

Humble Group's strategy is built on decentralized governance combined with a vertically integrated business model. We support our businesses in their innovative and optimize the collaboration between our portfolio companies. Humble Group AB offers several centralized support functions to capitalize on synergies and value-creating opportunities.

More information about our business and structure can be found in our annual report, available at our [website](#).

Our supply chain

Humble Group recognizes its purchasing power, and the impact our own purchasing practices can have on the conditions of workers in supply chains. Our supply chain has a global presence and comprises of over 5000 direct suppliers all over the world. Procurement is decentralized, meaning that all subsidiaries take ownership for their supplier contracts and are able to enter into business agreements with the partners that best meet their needs and quality requirements, as long as it upholds the standards of Humble Group's Supplier Code of Conduct.

Our main supply chain activities include the sourcing of different goods and services, where subsidiaries acquire goods such as raw materials and packaging depending on their roles as manufacturers, distributors, or brands. Manufacturing subsidiaries procure raw materials, while distributors and brands procure finished goods. Humble Group and its subsidiaries also purchase various services, including administrative and support services, as well as the upstream freight transport of raw materials, packaging and finished goods, mostly by road and sea.

Modern slavery risks

As a player in the FMCG industry, our company is inherently exposed to modern slavery risks. The nature of our sector, our global supply chains, and wider industry dynamics contribute to these vulnerabilities. This includes the purchasing of commodities and ingredients which are associated with elevated risks of modern slavery due to factors such as labor-intensive cultivation and processing, as well as home and personal care products sourced and produced in various regions worldwide. Our main modern slavery risks and challenges includes:

- **Complex, global supply chains:** Our products often pass through intricate supply chains involving multiple suppliers, manufacturers, and distributors across the globe. This complexity presents challenges in ensuring full transparency throughout the entire supply chain, making it difficult to identify and address potential instances of modern slavery effectively.
- **Exposure to high-risk agricultural commodities:** Our products often contain ingredients such as cacao, nuts, spices, bamboo, cotton and palm oil, which are known as high-risk agricultural commodities for modern slavery in supply chains. These commodities involve labor-intensive practices and often originate from regions with low labor costs, increasing the risk of exploitation and poor working conditions for the farmers and workers involved in their cultivation.
- **Manufacturing suppliers and sub-contractors in low-cost countries:** The manufacturing of our home and personal care products, especially those produced in countries in regions with less stringent labor regulations, may be subject to subcontracting, informal labor arrangements and the use of migrant workers. These practices can increase the risk of hidden exploitation and modern slavery within our supply chain.

Given these inherent risks, it is imperative that our company takes proactive steps to mitigate the risk of modern slavery in our operations and supply chains. By implementing robust policies and due diligence processes, conducting regular risk assessments and audits, providing training for suppliers and employees, and engaging in collaborative efforts with stakeholders, we demonstrate our commitment to combating modern slavery and safeguarding the rights and well-being of all workers involved in the production of our goods.

Actions taken to assess & address modern slavery risks

Group policies

Humble Group has several internal and external policies and procedures that establish a comprehensive framework, setting overarching rules for all subsidiaries in the group. All the policies are annually approved by the Board of Directors. The Group CEO is responsible to report on policy compliance to the Board, while subsidiary CEOs are responsible for implementing and managing policies in their respective business.

Our Group policies to address modern slavery risks include:

- **Humble Group's Supplier Code of Conduct:** Our Supplier Code of Conduct introduces requirements on suppliers and subcontractors to comply with Humble Group's fundamental principles, expectations, and values. This includes compliance with all international standards on human rights, such as the UN Guiding Principles on Business and Human Rights and the International Labor Organization (ILO) Conventions, and the principles outlined in our Human Rights Policy.
- **Humble Group's Human Rights Policy:** The Human Rights Policy commits Humble Group to uphold and promote human rights across its entire value chain, aligning with the UN guiding principles on Business and Human Rights and voluntarily signing the UN Global Compact. The policy explicitly states that we prohibit all forms of forced labor, child labor, modern slavery, and human trafficking.
- **Speak Up Policy (Whistleblowing):** The Speak Up Policy outlines when and how Humble Group employees, stakeholders or external partners can voice concerns and submit a whistleblowing report, for example regarding human rights violations.

Due diligence processes

To safeguard our commitment to internationally proclaimed human rights, due diligence processes are essential. We conduct detailed due diligence with regards to human rights, corruption, taxation and fair competition risks before proceeding with any merger, acquisition, or joint venture.

In 2023, we initiated a Group-wide project on supply chain due diligence with the purpose of aligning our group efforts to ensure that all our material suppliers are compliant with our Group policies and standards. Supply chain due diligence refers to the process of evaluating and assessing the environmental, social, and governance practices of suppliers within our value chain with the goal of identifying and managing risks. The purpose of this project is to centralize supply chain due diligence efforts and increase transparency while taking advantage of the subsidiaries' existing knowledge and due diligence processes. This to ensure that the Group is fully aligned with existing and upcoming regulations referencing the OECD Due Diligence Procedure, and that we have effective processes to act on high-risk suppliers, including modern slavery risks.


Whistleblowing

We endeavor to always offer workplaces where open and honest communication amongst all employees and stakeholders is valued and respected. If any employee, supplier or other stakeholder suspects a Human Rights violation, they can submit a whistleblowing report through Humble Group's Speak Up platform, which is publicly available on our website. The platform is supported by Humble Group's Speak Up Policy.

No retaliation will be taken against any employee for raising concerns under this policy. Humble Group will investigate, address, and respond to the concerns of employees and will proceed to take any necessary corrective action in response to any violation.

Approval

This statement has been approved and signed by:



Simon Petrán
CEO HUMBLE GROUP AB (PUBL)