

Human Rights Statement

Update 2023/24

Human Rights Statement

This statement describes Barry Callebaut's approach and efforts in 2023/24 toward safeguarding human rights and ensuring that slavery and human trafficking are not taking place in any part of our business and our supply chain. It is made in accordance with the United Kingdom's Modern Slavery Act 2015 ("UK MSA") and the California Transparency in Supply Chains Act of 2010. It addresses the period from September 1, 2023 to August 31, 2024.

This statement is issued collectively on behalf of the Barry Callebaut entities listed in Appendix I, which comply with the reporting requirements under UK and Californian legislation. Unless specifically indicated otherwise, references to 'we,' 'us,' and 'our' encompass Barry Callebaut as a whole, including the reporting entities in Appendix I and their subsidiaries and controlled entities. Appendix II provides a table detailing how this statement meets the reporting criteria set by the respective legislations.

1. Business structures, activities and supply chain

Barry Callebaut AG ("Barry Callebaut") and its subsidiaries (together, the "BC Group") is a global leading manufacturer of high-quality chocolate and cocoa products. The BC Group serves the entire food industry – from global and local food manufacturers to artisanal and professional users of chocolate, such as chocolatiers, pastry chefs, bakers, hotels, restaurants or caterers. Barry Callebaut is incorporated under Swiss law and has its head offices in Zurich, Switzerland. The BC Group is a fully vertically integrated business and has a unique global footprint with more than 60 factories around the globe. The BC Group is present on the ground in all key origin countries and has a longstanding commitment to sustainability.

The BC Group is organised into two segments: Global Chocolate and Global Cocoa. Within Global Chocolate the BC Group has five sales groups: Western Europe ("WE"), Central and Eastern Europe ("CEE"), North America, Latin America and Asia, Middle East and Africa ("AMEA"). The BC Group's business can also be separated into three different product groups: Food Manufacturers, Gourmet and Cocoa Products.

In 2023/24, the BC Group counted more than 13,000 employees worldwide. Further information on where BC Group's sites are located, its employees, supply chain and governance structure can be found via [Barry Callebaut's Annual Report](#).

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2. Our commitment to human rights

Overarching commitment to human rights

Our business has an influence on the livelihoods of many people around the world. We have a responsibility to all our stakeholders – farmers, employees, shareholders, customers, consumers, suppliers, and the communities where we operate – to act with integrity and purpose beyond financial success.

Barry Callebaut respects and promotes human rights across our operations and throughout our entire value chain, in line with the United Nations (“UN”) Guiding Principles on Business and Human Rights (“UNGPs”)¹. Our commitments align with the principles set forth in the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child (“CRC”), the African Charter on the Rights and Welfare of the Child. Additionally, we adhere to the OECD Guidelines for Multinational Enterprises. We strictly adhere to local labor laws in our factories and offices around the world. The stricter standard of either [International Labor Organization](#) (“ILO”) Convention 138 or local legislation determines our minimum age for employment.

Our Forever Chocolate commitments

Launched in 2016 [Forever Chocolate](#) is our plan to make sustainable chocolate the norm by 2025, with bold targets addressing key sustainability challenges, including the eradication of child labor in our supply chain. Our strategy develops through piloting, assessing, adapting, scaling and continuously updating based on data analysis, expert insights and policy developments.

In 2023, we reviewed our progress and refined our 2025 targets while setting new ambitions beyond 2025. Regarding human rights, we strengthened [our 2025 target](#) by committing to covering our entire supply chain by human rights due diligence, ensuring continued monitoring and remediation of child labor cases.

Looking ahead to 2030, we are expanding our focus to child rights protection and the prevention of child labor from occurring. Our approach is rooted in child-centered systems strengthening, data-driven risk analysis, and human rights due diligence

¹ Guiding Principles on Business and Human Rights Implementing the United Nations “Protect, Respect and Remedy” Framework https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

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aligned with the OECD Guidance for Responsible Business Conduct² (cf. below on page 6).

3. Identifying, assessing and addressing human trafficking, forced and child labor risks

Identifying human trafficking, forced and child labor risks

Barry Callebaut sources cocoa and other commodities from regions where human trafficking, forced and child labor are widespread. Instead of ceasing sourcing, we follow the UNGPs by assessing, monitoring, preventing, mitigating and remediating on the ground the risk of children becoming involved in child labor. This means, understanding which farming communities are most at risk, and providing these farming communities with the necessary support through a combination of poverty alleviation, access to quality education and adequate social infrastructure and awareness raising.

Child labor is a complex issue, and our [Forever Chocolate](#) commitment and our [Child Labor Position Statement](#) demonstrate our belief that all forms of child abuse have no place in a sustainable future for chocolate. Accordingly, we strongly condemn all forms of child abuse, including forced labor, slavery, child labor and all practices that exploit children and adults or expose them to harmful or hazardous conditions. Child labor, which according to the ILO is widespread in African agriculture, occurs largely on family farms and is defined as children doing work when too young or work that endangers them³.

Hazardous child labor⁴ can include activities such as using pesticides without protective clothing, sharp instruments or dangerous machinery, or other tasks which are directly harmful and risky for their age. It is also considered harmful if the work interferes with a child's education. Child labor is also considered hazardous if children are working more than the maximum set hours for their age or if the work is late or too early in the day.

² OECD Guidance for Responsible Business Conduct
<https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>

³ <https://worldcocoafoundation.org/focus-areas/child-labour>

⁴ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312528

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Forced child labor⁵ is the most egregious form of child labor and includes instances where children are made to work under threat or in fear of harm. Due to the criminal nature of forced labor, this would be a matter for local law enforcement agencies to address in line with their domestic judicial processes. If Barry Callebaut becomes aware of forced labor, this would be reported immediately to the appropriate authorities. If support from Barry Callebaut is required as part of remediation efforts, we would readily assist and follow up on the outcome.

Assessing and addressing human trafficking, forced and child labor risks

Barry Callebaut is committed to addressing human trafficking, child labor, and forced labor risks across our operations and supply chain. We have clear global policies, guidelines, and standards that are regularly updated to align with our human rights commitments.

Supplier Code and Sustainable Sourcing Policies

We expect our suppliers and their employees, agents and subcontractors, to share our strict commitment to human rights, particularly the eradication of forced labor and child labor. Our [Forever Chocolate sustainability strategy](#) commits us to sourcing 100% sustainable ingredients, which means, certified or verified and, critically, traceable to farm level by 2030. Barry Callebaut's [Supplier Code](#) details our expectations towards suppliers with regards to compliance with laws and regulations, human rights as well as environmental impact. Our suppliers must comply with all applicable local and national laws, rules, regulations and requirements of the country in which they grow, manufacture, distribute or provide products or services. We further expect suppliers to respect and comply with international labor standards as defined by the core conventions of the ILO, including freely chosen employment, no child labor, freedom of association, legal and fair compensation, no excessive working hours, no discrimination, respect and dignity, and safe and healthy working conditions.

⁵ According to the International Labour Organization, not all work done by children should be classified as child labor that is to be targeted for elimination. The term 'child labor' is often defined as work that deprives children of their childhood, their potential and their dignity, interferes with their schooling and is harmful to their physical and mental development. Activities such as carrying heavy loads or using chemicals are considered as 'unacceptable forms of child labor' because they are physically dangerous for children.

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To verify compliance of our suppliers with the principles set forth in the Supplier Code, we work with the Sedex platform and SMETA audit system. To leverage synergies we also accept other audit protocols that have been benchmarked by AIM Progress.

In addition, we have developed a set of [ingredient-specific guidelines](#) with detailed provisions for ingredients such as beet sugar, cane sugar, cocoa, coconut, dairy products, nuts, palm oil, soy, vanilla and more. These guidelines supplement our Supplier Code and focus on the principles we deem important to drive sustainable impacts in the respective ingredient supply chains. They also list the standards and programs we work with to monitor our suppliers' progress towards these principles.

Human rights due diligence: Independent third-party verification and audits

Barry Callebaut applies an overarching human rights due diligence framework modeled after the OECD Due Diligence Guidance for Responsible Business Conduct. To assess and mitigate human rights risks, we follow a data-driven risk analysis approach. It follows the UNGPs, which state that “to prioritize actions to address actual and potential adverse human rights impacts, business enterprises should first seek to prevent and mitigate those that are most severe or where delayed response would make them irremediable”. For all the ingredients we source, we use Verisk by Maplecroft as a first step. Verisk quantifies the salient human rights risk at a country and ingredient level. For high-risk ingredients such as sugar cane and vanilla, we rely on third-party sustainability certification requirements and ESG third party due diligence processes. As we do not directly source from the farmers in these supply chains, we rely on third-party audits for compliance. As a result, we ensure that all ingredients from regions at high risk of child labor involvement are certified or verified sustainable.

Barry Callebaut follows the international standards as defined by [SEDEX](#). All our sites have conducted initial SMETA audits, which cover (child) labor, health & safety, environment and business ethics standards. As of August 31, 2024, all sites were SMETA compliant.

We believe the highest risk for child labor in our supply chain stems from the cocoa we source from Ghana and Côte d'Ivoire, where an estimated 1.56 million children were

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involved in child labor for cocoa cultivation in 2018/19⁶, primarily on family-owned farms. As such, third parties conduct in-depth Human Rights Impact Assessments (“HRIAs”) for the main cocoa sourcing countries and regions. Results of the HRIAs are used to prioritize and develop our interventions and engagement with suppliers. This is followed by in-depth, independent HRIAs for all the main cocoa sourcing countries and regions. Following Ecuador in the previous fiscal year, in 2022/23 HRIAs were conducted in Brazil, Cameroon, Côte d'Ivoire, Ghana, Indonesia and Nigeria. Results of the HRIAs are now being used to prioritize and develop our interventions and engagement with suppliers.

Child labor due diligence

Child Labor Monitoring and Remediation System

In 2023/24, we continued to monitor and identify cases of child labor in our cocoa supply chain in West Africa via our Child Labor Monitoring and Remediation Systems (“CLMRS”) based on the industry practice as developed by the International Cocoa Initiative (“ICI”).

In 2023/24, we continued to increase the number of communities we now cover with our child labor monitoring and remediation systems, including 517,613 farmers (+50.9%) in Côte d'Ivoire, Ghana, and Cameroon. In 2023/24, we identified 19,389 cases of child labor. Our commitment to remediation has continued with 41,190 cases of child labor under remediation.

Implementing individualized remediation interventions for a child and their family requires time – both to build trust and determine the best course of action. According to ICI recommendations, a case is considered remediated only after two consecutive onsite inspections confirm that the child is no longer subjected to child labor. If child labor is identified during a follow-up visit, the remediation plan is reassessed and monitoring continues. The full process - from identification to remediation and two follow-up visits - takes at least 12 months.

We work closely with ICI to remediate identified cases through a comprehensive approach that prioritizes education, social issues and gender-related considerations.

⁶ NORC Report (2020), Assessing Progress in Reducing Child Labor in Cocoa Production in Cocoa Growing Areas of Côte d'Ivoire and Ghana. University of Chicago

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Our remediation activities include providing school kits and birth certificates, ensuring legal protection and school access, raising awareness on child labor through training for families and communities, and conducting follow-up visits to farmer homes.

This fiscal year, the number of identified child labor cases considered remediated on the grounds that the child was not found performing child labor during two consecutive monitoring visits amounted to 26,530 cases (+152.6%).

Child labor due diligence: Community development approach

In 2023/24, alongside our work on CLMRS, we advanced our efforts to strengthen our supply chain and community child protection systems, while further expanding the implementation of our grievance mechanism, and developing and testing new child-friendly monitoring tools. Given the scale of child labor in West Africa, it is not possible to tackle the issue of child labor case by case, alone. Therefore, Barry Callebaut advocates for a wider community development approach to create a protective environment where children can realize their rights and full potential. We take a holistic community systems approach, addressing interconnected challenges through an iterative process with our partners. Our interventions focus on identifying high-risk communities and providing targeted support by strengthening the local child protection systems, improving access to quality education and adequate community infrastructure, and enhancing livelihoods. For more information on our community systems approach see our [Annual Social and Environmental Impact Report 2023/24](#).

Our company efforts are coupled with cocoa sector collaboration as well as public intervention to bring about a structural solution to child labor. We believe enforcement of a strong regulatory framework to protect human rights in origin countries should be part of a broader effort to strengthen an enabling environment for sustainable cocoa farming. Such an approach would go hand in hand with the due diligence legislation currently being debated in consuming countries, which can only be fully effective if sector-wide traceability is established and effective systems are set up to identify, prevent, mitigate and remediate adverse business activities on human rights and the environment.

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Supporting our suppliers' due diligence processes

In the cocoa communities we source our cocoa, we are supporting our suppliers in setting up their due diligence process. As such, we support the establishment of Human Rights Committees ("HRCs") at the farmer group level. We assist them in developing their Human Rights structures and function and enable them to effectively assess and address adverse human rights impacts in their cocoa supply chain operations. The HRCs oversee and manage the prevention, identification and remediation of human rights violations. Child protection training and awareness raising is also a key aspect of our strategy in the cocoa communities we source from.

Training and capability building

We prioritize building awareness and capabilities on human rights risks through comprehensive informal and formal training programs for our employees.

All Barry Callebaut employees, representatives and business partners (suppliers, vendors, consultants, volunteers, etc.) must respect local laws and regulations related to human rights and adhere to our policies and codes in a way to ensure that no human being we come into contact with through our business operations is placed at risk of harm or abuse.

Barry Callebaut Code of Conduct

Our Human Rights Statement builds on the principles in our [Code of Conduct](#), that sets forth mandatory principles and requirements for behavior. Our Code of Conduct applies to all BC Group employees and is complemented by global and local policies. It articulates our minimum standards regarding human rights, forced labor and child labor. Expectations and procedures for reporting wrongful acts or suspected wrongful acts in violation of the Code are communicated to all employees. It is the responsibility of each employee to uphold the principles of the Code and employees are encouraged to seek advice and to raise questions or concerns at any time with their manager, Human Resources or Group Legal & Compliance if they have reason to suspect non-compliance with the Code of Conduct. Approved by the Executive Committee and signed by the CEO, the Code is available in 17 languages. In addition, the Chairman of the Audit, Finance, Risk, Quality & Compliance Committee ("AFRQCC") is regularly updated on compliance cases and activities.

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Training for employees and suppliers

To ensure we put policy into practice, meaning ensuring our employees and suppliers gain an understanding of the policies and the issues they cover and can respond appropriately, we train all suppliers in our direct cocoa supply chain on child and forced labor and support them in assessing and addressing child labor. Such training is provided in collaboration with our NGO partners.

In addition, in 2022/23, we developed an online onboarding training covering our Code of Conduct, child labor safeguarding and forced labor. Employees working directly with communities and farmers must attend in-depth training and annual refresher courses on these topics.

Child protection training and awareness remain a key aspect of our strategy in the cocoa communities we source from. We expect our suppliers and their employees, agents and subcontractors to uphold our commitment to human rights by signing our Supplier Code (cf. page 5), conducting their own HRIAs, maintaining a grievance system, providing training for their own suppliers, and ensuring remediation where needed.

Grievance mechanism

BC Group employees who witness behavior suspected to violate the BC Group's Code of Conduct or the law are encouraged to raise concerns directly with the individual involved, their manager or local HR. If this is not possible or they feel uncomfortable contacting their line manager, they can report through our [Integrity Line](#), a dedicated whistleblowing platform that allows anonymous reporting. Employees can also call the Integrity Line hotline (24/7).

In addition, to encourage stakeholders and affected groups from the supply chain to report any potential grievances and concerns on human rights, deforestation, and governance violations, Barry Callebaut has established a grievance platform. Through the grievance platform we are inviting input from all stakeholders that will help us to identify potential issues or violations, increase transparency and promote continuous improvement. Our grievance platform covers our entire supply chain. The Compliance team hosts the grievance platform and acts as a coordinator to ensure the adequate

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processing of incoming grievances. A complaint can be raised by parties who are themselves affected, such as workers or local communities, by an organization representing the affected parties, such as a trade union, or by an independent organization, such as an NGO. With this grievance mechanism, Barry Callebaut has established a process to systematically receive, investigate and respond to complaints affecting Barry Callebaut's supply chain from rights holders and implement time-bound actions to resolve these issues. In this way, Barry Callebaut ensures that an effective grievance mechanism is in place for all external stakeholders.

4. Internal accountability

The BC Group's ESG (Environmental, Social, and Governance) strategy is overseen by the Board of Directors of Barry Callebaut. This oversight includes aligning the business and ESG strategy and ambitions, ensuring a long-term vision on the development of our business value, and actively identifying and managing actual and forward-looking risks. The Board of Directors of Barry Callebaut ensures that adherence to regulations and sustainability topics and matters are fully integrated into the purpose, strategy, decision-making, risk management, and accountability reporting.

The AFRQCC of Barry Callebaut, a sub-committee of the Board of Directors of Barry Callebaut, reviews our internal system controls, risks, quality, and the reliability of our external reporting. It also oversees the implementation of ESG processes, controls and robust reporting and the direct integration of ESG into the audit structure and the relationship with investor relations.

Information about our Forever Chocolate sustainability strategy, sector issues and related actions is communicated regularly via the company intranet, the corporate website, and internal and external publications.

5. Effectiveness of our actions

Barry Callebaut has been working to incorporate human rights in all aspects of our business for many years. We monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback.

We communicate our efforts to solve the material issues in our supply chain through various channels and reports on a regular basis, which includes our [Annual Forever](#)

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[Chocolate Progress report](#), which is verified by an independent, third-party assurance provider. The KPIs disclosed on human rights, including child labor (child labor in cases identified, under remediation and remediated) are included in our Forever Chocolate Progress Report, and our annual Global Reporting Initiative (“GRI”) report and Assurance statement.

In addition, we maintain a [dedicated public website](#) covering the full range of relevant ESG topics and related reports and policies, and a public tracker sheet disclosing our key KPIs progress over the past eight years.

6. Addressing the link between human rights and poverty

Most of the world's cocoa comes from Côte d'Ivoire and Ghana, where it is predominantly cultivated by independent smallholder farmers, many of whom rely on family labor. With cocoa accounting for 70% to 85% of household income in Côte d'Ivoire⁷ and two-thirds in Ghana⁸, the transition to responsible labor practices must be coupled with income stabilization strategies to prevent economic hardship.

To remediate potential income loss, we implement the following measures: (1) At Barry Callebaut, we aim to transform the way cocoa is produced by enhancing the existing farming model in Côte d'Ivoire, West Africa, and beyond. We promote better agricultural practices, focusing on higher yields and larger farms to help farmers achieve improved income. Our extensive six-year study, in collaboration with [Agri-Logic](#), IDH, and Rainforest Alliance, confirms that poverty reduction is driven by these three crucial factors: yield, farm size, and price. (2) Given that 70% of farmers' time is spent on post-harvest activities rather than pre-harvest investments that increase productivity, we provide training, financial support and resources to help farmers shift their focus toward yield-enhancing farm practices. (3) We advocate for better pricing mechanisms to ensure fair compensation for farmers. In 2023/24 Barry Callebaut actively participated in the working group on pricing mechanisms under the Côte d'Ivoire-Ghana Cocoa Initiative (“CIGCI”) Economic Pact. Our aim is to shift the focus of discussion to the farm gate price, recognizing that higher farm gate prices can

⁷ Pluess, J. (November 2018), Children's Rights in the Cocoa-Growing Communities of Côte d'Ivoire, Abidjan: UNICEF Côte d'Ivoire. Available from <https://sites.unicef.org/csr/css/synthesis-reportchildren-rights-cocoa-communities-en.pdf> (accessed August 5, 2021)

⁸ Cocoa Farmers in Ghana experience poverty and economic vulnerability (2017). Available from <https://cocoainitiative.org> (accessed August 2, 2021).

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significantly contribute to poverty reduction. We believe that analyzing the appropriate mechanisms in a broader context of price construction, including the significance of farm gate prices and export prices, will have a considerable positive impact on farmers' incomes.

For more information regarding our approach, please view our latest [Forever Chocolate Progress Report 2023/24](#).

7. Engagement and collaboration with all supply chain actors

Engagement to assess our material risks

In October 2023, Barry Callebaut published its most recent comprehensive double materiality assessment. Through a materiality assessment, a company identifies, assesses, and prioritizes, based on extensive external stakeholder consultation, the ESG topics with the highest relevance for a company's operations. The concept of "double materiality" urges a company to not only consider the impacts they impose on humans and nature ("impact materiality") but also the risks and opportunities related to ESG topics that might affect their financial situation ("financial materiality"). Double materiality also includes the benchmarking of the list of priority ESG topics against the impact each of them has, or can have, on the financial performance of a company and its business model. For this, our Enterprise Risk Management specialists worked alongside our ESG task force to identify the financial and business risks tied to the shortlisted ESG topics. In this process, the entire value chain was analyzed and a time horizon for actions up to 2030 was adopted. Overall, our 2023 double materiality assessment reconfirmed our commitment to the Forever Chocolate pillars: Prospering Farmers, Human Rights, Thriving Nature, and Sustainable Ingredients. Within these pillars, there are five standout topics considered to be material: Supply Chain Traceability, Climate and Energy, Biodiversity and Ecosystems, Workers in the Value Chain, and Affected Communities.

Collaboration across our supply chain

Achieving a fully sustainable cocoa and chocolate sector requires collaboration across the supply chain. Structural change, particularly in poverty reduction and child labor, forced labor and human trafficking prevention, depends on government action in cocoa-producing countries to improve traceability, infrastructure and policy

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enforcement. At the same time, regulatory intervention in cocoa-consuming regions is needed to increase the demand for sustainably sourced cocoa.

We are committed to mobilizing key stakeholders to support a transformative cocoa farming model that generates a living income and protects human beings from exploitation. In December 2019, we partnered with industry associations, companies and NGOs to advocate for EU legislation on mandatory due diligence for cocoa supply chains. We support the Directive on Corporate Sustainability Due Diligence (“CSDDD”) which will provide impetus to strengthen an enabling environment, as well as the market pull, for sustainable cocoa.

We believe regulatory and multi-stakeholder initiatives represent an important step forward in driving the necessary transformation of the cocoa sector, and are important building blocks for making sustainable chocolate the norm.

Establishing industry-wide sustainability standards and programs is essential for the sustainable sourcing of raw materials, as certification is only the starting point. We have continued to work with suppliers and industry programs to define and implement sustainability standards for all ingredients we source. Our approach has been built on the view that sustainability impacts can be effectively scaled up only if they are embedded in and supported by government policies. Also, we are a signatory of the [2024 Child Labor in Cocoa Coordinating Group \(CLCCG\) Framework of Action](#), which is committed to combating child labor in the cocoa sector.

More information on these and other achievements, as well as on our approach and measured impact, is provided in our latest [Forever Chocolate Progress Report 2023/24](#), (published November, 2024).

8. Progress reporting

The information provided above, as well as detailed information and progress reporting about our sustainability strategy, programs and activities, is available on the Barry Callebaut corporate website (www.barry-callebaut.com) and our [Forever Chocolate Progress Report 2023/24](#). We will be regularly updating our posted information.

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Appendix I – Reporting entities

This Human Rights Statement is made on behalf of the whole BC Group and more specifically the following Barry Callebaut UK and US legal reporting entities:

Barry Callebaut (UK) Ltd
Barry Callebaut Beverages UK Ltd
Barry Callebaut Manufacturing (UK) Ltd
Barry Callebaut North America Holding nc.
Barry Callebaut USA Holding Inc.
Barry Callebaut U.S.A. LLC
Barry Callebaut USA Service Company Inc.

Appendix II - How our Human Rights Statement addresses the UK Modern Slavery Act and California Transparency in Supply Chains Act Reporting Criteria

UK Modern Slavery Act recommended reporting criteria	California Transparency in Supply Chains Act mandatory reporting criteria	Reference in this statement
Information about the organisation’s structure, its business and its supply chains	N/A	Section 1
Parts of the organisation’s business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage that risk.	<p>Verification: Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.</p> <p>Audits: Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.</p>	Section 3

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<p>Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains;</p>	<p>Certification: Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.</p>	<p>Section 3</p>
<p>N/A</p>	<p>Internal Accountability: Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.</p>	<p>Section 4</p>
<p>The training about slavery and human trafficking available to its staff</p>	<p>Training: Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.</p>	<p>Section 3</p>
<p>Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.</p>	<p>N/A</p>	<p>Section 5</p>