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Annual Slavery and Human Trafficking Statement Bahlsen UK LLP 2024

Introduction Statement of Intent:

This statement is made by Bahlsen LLP for itself and it is a statement made in accordance with section 54 of the Modern Slavery Act 2015 and covers the financial year from 1st January to 31 December 2024 (the Financial Year).

Bahlsen LLP is fully committed to preventing acts of modern slavery and human trafficking from occurring within our business and seeks to impose those same high standards on its suppliers. We take a zero-tolerance approach to unethical practices and we are committed to acting professionally, fairly and with integrity in all our business dealings and supply chain relationships.

Our Business

Bahlsen LLP is an importer and distributor of finished sweet baked goods based in Chalfont St Peter, Gerrard's Cross, Buckinghamshire. Bahlsen LLP is a subsidiary of the parent company Bahlsen GmbH & Co. KG (Bahlsen Group). Our activities take place solely in the United Kingdom.

Our Policies

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

1. Modern Slavery Statement. This sets out our approach on modern slavery and explains how as a business we can identify any risks and how to mitigate these.
2. Recruitment and onboarding processes and policy. We operate a robust recruitment and onboarding policy and process, including conducting eligibility to work in the UK checks, with all employees paid directly into their nominated bank accounts for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Bahlsen LLP as part of Bahlsen Group has a code of conduct as well as a policy statement regarding human rights and the environment. These set out our corporate and entrepreneurial responsibility, our respect for each other, safety at work and our whistle blowing policy.

Our Supply Chain

We supply the UK retailers and foods service sectors with sweet baked goods sourced from the Bahlsen group and affiliates. The import and distribution is contracted out to third parties and we select these third-party service providers with the greatest of care and after appropriate due diligence checks.

We are committed to taking appropriate steps to ensure that there is no modern slavery or human trafficking in our supply chains and contracts or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to

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ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our suppliers are obliged to comply with all applicable laws (in both their own country and the United Kingdom) in their contract with us and to comply with our values.

Risk assessment processes

Bahlsen LLP have considered the risk of modern slavery in our own operations and we have concluded that, on the basis that we are a UK employer subject to UK employment protections and practices and already have well developed checks and balances within our business, we have a low risk of modern slavery occurring in our own operations.

Bahlsen LLP have considered the risk of modern slavery occurring in our use of direct suppliers. Given the businesses that we work with and the existing checks and controls that we apply in these areas, we have concluded that the risks of modern slavery are low in this area although we are always continuing to improve and mitigate the risks further.

As part of our initiative to identify and mitigate risks within our business and supply chains, we have put together a team who carry out regular risk assessments. In addition, we take the following measures:

- Identify and assess potential risk areas in our supply chain.
- Monitor potential risk areas in our supply chain.
- Protect whistleblowers.
- Introduce training for all new employees and periodically for existing employees as part of our ongoing compliance training.

Due diligence processes

All Bahlsen employees are required to abide by all of our published policies and procedures in order to ensure that we exhibit and promote ethical business activities.

We are continuously evolving to identify any risk mitigation within our existing business and supplier base. We require employees and our supply chain partners to share our ethical business practices ambitions.

Bahlsen LLP expects all of its employees and supply chain partners to report on any activity that is or has the potential to be in breach of our Anti-Slavery and Human Trafficking Policy.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. Bahlsen LLP aims to further develop our employees knowledge and understanding of the Human Trafficking and Slavery Act through training and regularly updates its training program.

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Measuring effectiveness

Bahlsen LLP has access to monitoring systems to identify the need for further action to be taken. Bahlsen LLP renews its commitment to continue risk assessments and due diligence activities.

This statement has been approved by the Main Board of Bahlsen Group and signed by Phil Bones, UK Commercial Director, and Andre Jacubczik, Head of Compliance & Internal Audit at Bahlsen Group.

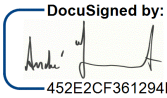
Signed by:
Phil Bones
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16 January 2025

Phil Bones

Dated:

UK Commercial Director, Bahlsen UK LLP

DocuSigned by:

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15. Januar 2025

Andre Jacubczik

Head of Compliance & Internal Audit,
Bahlsen Group (Bahlsen GmbH & Co. KG)

Abschlusszertifikat

Umschlag-ID: ED2BC1E6-5B66-4C40-884E-992B18ABCB26
Status: Abgeschlossen
Betreff: Mit Docusign abschließen: Annual Slavery and Human Trafficking statement2024.docx
Quellumschlag:
Dokumentenseiten: 3
Signaturen: 2
Zertifikatsseiten: 8
Initialen: 0
Signatur mit Anleitung: Aktiviert
Umschlag-ID-Stempel: Aktiviert
Zeitzone: (UTC+01:00) Amsterdam, Berlin, Bern, Rom, Stockholm, Wien

Umschlagersteller:
Michael Nuernberger
Podbielskistraße 11
Hannover, Niedersachsen 30163
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Eintragsverfolgung

Status: Original
15.01.2025 15:57:28
Inhaber: Michael Nuernberger
Michael.Nuernberger@bahlsen.com
Standort: DocuSign

Unterzeichnerereignisse	Signatur	Zeitstempel
Andre Jacubczik andre.jacubczik@bahlsen.com Sicherheitsstufe: E-Mail, Kontoauthentifizierung (keine)	DocuSigned by: 452E2CF361294F1...	Gesendet: 15.01.2025 15:59:58 Eingesehen: 15.01.2025 16:10:20 Signiert: 15.01.2025 16:11:02 Selfservice-Signieren
	Signaturübernahme: Hochgeladenes Signaturbild Mit IP-Adresse: 91.54.179.66	

Vereinbarung bezüglich elektronischer Unterlagen und Signaturen:
Akzeptiert: 06.03.2023 13:43:26
ID: 7cf9ebf6-961d-4ab1-b99d-b5c112b5cc7c

Phil Bones phil.bones@bahlsen.com Sicherheitsstufe: E-Mail, Kontoauthentifizierung (keine)	Signed by: Phil Bones 0CB982FE3B1142A...	Gesendet: 15.01.2025 15:59:57 Eingesehen: 16.01.2025 10:25:04 Signiert: 16.01.2025 10:26:14 Selfservice-Signieren
	Signaturübernahme: Vorgegebener Stil Mit IP-Adresse: 161.69.66.25	

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Akzeptiert: 16.01.2025 10:25:04
ID: a53ce54a-9360-4480-9e64-d12940c10200

Vor-Ort-Unterzeichner – Ereignisse	Signatur	Zeitstempel

Bearbeiterversandereignisse	Status	Zeitstempel

Beauftragtenzustellereignisse	Status	Zeitstempel

Vermittlerversandereignisse	Status	Zeitstempel

Zertifizierter Versand - Ereignisse	Status	Zeitstempel

Kopienereignisse	Status	Zeitstempel

Zeugen-Ereignisse	Signatur	Zeitstempel

Notarereignisse	Signatur	Zeitstempel

Umschlagereignisse – Überblick	Status	Zeitstempel
Umschlag gesendet	Hash-codiert/verschlüsselt	15.01.2025 15:59:58
Zertifiziert zugestellt	Sicherheitsprüfung ausgeführt	16.01.2025 10:25:04

Umschlagereignisse – Überblick	**Status**	**Zeitstempel**
Signiervorgang abgeschlossen	Sicherheitsprüfung ausgeführt	16.01.2025 10:26:14
Abgeschlossen	Sicherheitsprüfung ausgeführt	16.01.2025 10:26:14

Zahlungen	**Status**	**Zeitstempel**

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