

PAULIG

Paulig Group Modern Slavery Statement 2025

Overview

At Paulig Group, commitment to high quality, a long-term view and a sense of responsibility have been our core beliefs since 1876 when Gustav Paulig founded the company.

We recognise that modern slavery, including forced or compulsory labour, slavery, servitude, human trafficking, state-imposed forced labour, and child labour is always a concern when operating in a global environment and we have zero tolerance towards it. We understand that our biggest exposure to modern slavery is in our supply chains. We are committed to enhancing social responsibility through our purchases, due diligence procedures and capacity building, both in our own operations and in the supply chain.

1. Our organization, business, and supply chains

Paulig Group is a family-owned, international food and beverage industry business, known for its high-quality brands, such as Paulig, Santa Maria, Conimex, Poco Loco and Zanuy. We also serve most of European retailers with their Tex Mex Retail Brands.

In the financial year ending December 31st, 2025, our revenue totalled EUR 1,388.9 million, and Paulig Group's two Business Areas were Branded and Customer Brands. In 2025, we had on average 2,715 employees. The company is headquartered in Helsinki, Finland.

In 2025, we operated in the Nordic and Baltic Countries, Continental Europe and the United Kingdom. We have altogether 14 factories in six countries: Finland, Sweden, Estonia, Belgium, United Kingdom and Spain.

In 2025, we completed the acquisition of Conimex and continued the integration of UK-based Panesar Foods, strengthening our innovation capabilities and enabling several new product launches. In the case of mergers and acquisitions, new entities joining the Paulig Group will be incorporated into a time-bound integration roadmap for responsible sourcing.

Paulig products are sold in more than 70 countries. In 2025, 49% of Paulig Group's sales were in the Nordic countries and 51% in other markets. Branded accounted for 62% of the external revenue, Customer Brands 38% and Other 0%.

Our supply chains are global, consisting of approximately 480 direct raw material, packaging material and traded goods suppliers nearly 70 countries, and 6,395 indirect suppliers in the countries we operate in. Our key sourcing countries by expenditure include Brazil (green coffee), Belgium (raw materials, contract manufacturing, and packaging materials), Colombia (green coffee and contract manufacturing), Spain (raw materials, contract-manufactured products, and packaging materials) and Sweden (contract manufacturing, packaging materials, and raw materials).

Our sustainability work covers the whole value chain and focuses on, fair and inclusive way of working, climate and circularity, and health and wellbeing of people and planet. This work is done in close cooperation with our partners and stakeholders throughout the value chain. In sourcing we emphasize human rights, decent working conditions and fair employment together with other aspects.

Read more at <https://www.pauliggroup.com/sustainability>

2. Our key policies in relation to modern slavery

We have zero tolerance towards modern slavery or any kind of human rights violations. We are committed to international standards such as the Universal Declaration on Human rights, the Core Conventions of the International Labour Organisation (ILO), the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the ten principles of the UN Global Compact. Our Ethical Principles are based on these standards and set the norm for ethical behaviour for all Paulig Group employees in all units.

Paulig's Human Rights Principles outline our commitment to respecting internationally recognised human rights and define our approach to managing them. Approved by the Paulig Board of Directors, these principles apply to all Paulig entities, employees, and any external parties working on the company's behalf, including contractors and consultants. These principles complement our existing Ethical Principles and the Paulig Code of Conduct for Suppliers. Additionally, we aim to benchmark our models and solutions against industry best practices.

We want to foster a sustainable way of sourcing. The Paulig Code of Conduct for Suppliers stipulates the minimum standards suppliers must meet, including the provision of safe and decent working conditions and the observance of human rights and environmental standards within their own operations and supply chains. The Code applies to all first-tier suppliers delivering goods or services to any entity within the Paulig Group and forms a mandatory component of our supplier agreements.

We are committed to preventing modern slavery and human trafficking in our operations and supply chains. We operate a zero-tolerance approach to forced, bonded or compulsory labour and require that all work is undertaken voluntarily. Workers must never be required to pay recruitment fees or deposits, nor have their identity documents retained. Employment terms must be fair, transparent, and communicated in a language that workers understand. These expectations are set out in our Supplier Code of Conduct and form part of our due diligence.

Our Responsible Sourcing Guidelines provide guidance to our employees for aligning with Paulig's sustainability ambitions, monitoring compliance with the Paulig Supplier Code of Conduct, and meeting evolving legal and customer requirements. These requirements also inform the development of our products and services, as well as the formulation of future strategies.

Our policies and guidelines are available at <https://www.pauliggroup.com/sustainability/managing-sustainability>.

We want our employees to feel comfortable with voicing dissenting opinions and concerns at the workplace. Our internal whistleblower channel serves as a tool to raise possible concerns on any unethical behaviour observed or suspected in our operations. All the possible misconduct is evaluated and investigated, and the cases are handled by Paulig's whistleblowing team. Paulig's employees in all operating countries can raise possible issues anonymously through a whistleblowing tool maintained by a third party and available in six languages. The tool consists of a Group channel and local reporting channels for Finland, Belgium, Estonia, Sweden and Spain. In parallel with the internal channels, we provide a Whistleblowing channel to our external stakeholders to report any misconduct on our part.

In 2025, we received a total of 32 cases, comprising six external and 26 internal reports, four of which were tests. The primary areas of concern reported were related to HR. A dedicated team evaluates and investigates non-conformities, ensuring that all actions are logged and handled with strict confidentiality. Cases are reported annually to the Paulig Board of Directors.

Sustainability is part of our daily work, and practical actions are a responsibility of the business management. There is a sustainability team at Group-level to oversee that policies are up-to-date and to monitor implementation and compliance. Stakeholder collaboration is key in addressing sustainability challenges and driving development. Furthermore, employees involved in purchasing are trained on sustainability and human rights issues, and these aspects are embedded in the purchasing process.

3. Due diligence procedures to manage risks within our value chains

Human rights due diligence is an ongoing process, as risks and impacts may change over time with our operations and supply chains. Paulig reviews and, where necessary, updates its human rights management approach every three years to ensure its continued effectiveness. We have conducted a human rights risk screening on our value chain in 2023, providing a comprehensive view of human rights risks at Paulig. The screening is based on country risk classifications, reports and studies from various organizations and authorities, information obtained from our sustainability audits and third-party audits, employee surveys, whistleblower channel reports, and input from Paulig employees in various functions. Based on this assessment and the existing mitigation measures and controls in place, we have identified forced labour and modern slavery as significant human rights risks for Paulig, amongst others.

Forced labour has emerged as one of the most significant human rights risks within our supply chain in Thailand, particularly among contract manufacturing suppliers employing migrant workers from neighbouring Southeast Asian countries. In 2024–2025, we undertook a series of in-depth human rights assessments across our Thai supplier base in collaboration with local and international human rights experts, enabling us to deepen our understanding of both actual and potential adverse impacts. The purpose of these assessments was threefold: to

identify and evaluate human rights risks, to engage meaningfully with affected rightsholders, and to conduct a rapid analysis of the root causes of any identified impacts. Meaningful engagement with affected rightsholders, in the case with migrant workers from Myanmar, Cambodia and Laos, was a central element of the assessment, ensuring that their insights and experiences informed both the assessment and the resulting recommendations.

We are consistently engaged in mapping human rights-related risks, developing processes, and establishing more systematic due diligence practices with our suppliers and other partners. Our goal is to ensure the respect for human rights both within our own business and across our value chain. Moreover, we are committed to continuously enhancing knowledge on human rights topics within Paulig.

4. Risk assessment and management within our supply chains

As a food and beverage company, our value chains are global and complex. A significant proportion of Paulig's raw materials and products by volume are sourced from Europe, specifically from Belgium, Spain, and Sweden, where the risk of negative impacts is lower. However, approximately one-third of our raw materials by volume originate from risk countries, such as Brazil, Colombia, and India. We utilise the Sedex country risk classification as part of our value chain risk management. While Sedex considers a country high-risk if its score is six or above, Paulig applies a modified threshold of five or above. This adjustment ensures continuity with the previously utilised amfori BSCI risk classification, which remains relevant to many of our customers.

We recognize that our exposure to modern slavery is greatest in our raw material and contract manufactured products supply chains. We also acknowledge that in our supply chains there are contributing factors that heighten risk levels for human rights violations and modern slavery - such as lengthy and less visible supply chains, the presence of seasonal, temporary and low-skilled workforce, regions with high migration rates, and countries with poorly enforced or less developed legislation.

We carefully choose our suppliers and aim at long-term partnerships to create shared value to all parties in the supply chain. We strive to improve traceability in our supply chain, to develop our supplier assessment and support our suppliers to improve their operations and practices, also in challenging environments.

Responsible sourcing requirements are integral to Paulig's core procurement practices. This approach spans the entire supplier lifecycle, from initial selection to annual performance reviews and contract renewals. A supplier risk assessment is conducted prior to initiating collaboration with any new partner. Furthermore, existing approved suppliers are re-evaluated based on specific criteria, such as significant operational changes or stakeholder feedback. In our assessment of suppliers' human rights-related risks, we employ a combination of country risk assessments, supplier self-assessments, and both own sustainability and third-party audits to manage risks.

Supplier-specific risks are re-assessed triennially by our sustainability team using self-assessment questionnaires. These assessments gather data regarding suppliers' participation in sustainability initiatives, external certifications and verifications, and their processes for managing human rights impacts, both within their own operations and across their supply chains. We also trace the country of origin for raw materials. Based on the responses and any audit results, supplier sustainability risk is categorised as low, medium, or high, with appropriate actions planned accordingly.

With our own sustainability audits, we pursue building mutual trust and knowledge with our suppliers. External verifications supplement our due diligence to mitigate risks and identify areas for development. We are working with the spices and herbs group to achieve our goal that by 2030 all raw materials from high-risk countries are sourced responsibly, meaning they come from 3rd party verified producers.

5. Training and capacity building to combat modern slavery

We recognise that capacity building through training, worker's empowerment and partnerships have a pivotal role in ensuring that different stakeholders across the supply chains understand and are able to identify human rights risks. Capacity building is also key in equipping workers to better protect themselves.

All Paulig employees complete a mandatory online training on our Ethical Principles as part of the onboarding programme. The purpose of the training is to ensure our ethical principles are reflected in our methods and daily work. We want our employees to feel comfortable with voicing dissenting opinions and concerns at the workplace.

We prioritise continuous competence development for staff engaged in sustainability and sourcing. Our own employees conducting supplier sustainability audits are required to complete external auditor training, such as the SA8000 social accountability training, while our sourcing teams receive capacity building on responsible sourcing guidelines.

Human rights issues are often broad and complex and cannot be solved by a single company. We are committed to working with our employees, suppliers, and relevant stakeholders to develop tools and ways of working to make a real change. We value long supplier relationships and meet with our key suppliers regularly. During these meetings we communicate the requirements of our Code of Conduct for Suppliers and actively bring up relevant social responsibility issues into conversation to strive for continuous improvement.

We believe that in the prevention of human rights violations, it is important to have cooperation at local, national, and international level. We participate in social or community projects, for example together with our long-term raw material suppliers, that support the realisation of human rights locally and in our supply chain.

Furthermore, we are also a member of different collaboration initiatives such as the Sustainable Spices Initiative, which aims to sustainably transform the mainstream spices sector, thereby securing future sourcing and stimulating economic growth in producing

countries. In early 2025, Paulig joined Sedex, a non-profit organisation providing an online database for companies to access data on ethical and responsible business practices within global supply chains.

6. Performance, monitoring, and future developments

Our ambition is to ensure that, by 2030, all raw materials sourced from high-risk areas originate from sustainable sources and are verified by external parties. To realise this ambition, we utilise best practices, specialised tools, and collaborative projects. As a foundational step, we have defined Paulig's accepted standards and verification methods for contract manufacturing facilities and raw materials sourced from risk areas. These standards cover both social and environmental aspects, and we provide ongoing training on these methodologies for relevant internal and external stakeholders.

Approximately one-third of our raw materials by volume originate from risk countries according to Sedex risk country classification. Although spices and herbs represent a relatively small proportion of our overall sourcing volumes compared with commodities such as green coffee, flours and oils, they are among our most complex raw material categories from a sustainability and human rights perspective. The majority of our spice and herb volumes are sourced from high-risk countries and produced predominantly by smallholder farmers who may be exposed to environmental, social and economic vulnerabilities. Accordingly, following coffee, we prioritised this category and initially focused on six key spices, collectively accounting for approximately half of our total spice and herb volumes.

While the 2025 target of achieving 100% sustainably sourced volumes was not fully met due to quality constraints and higher-than-anticipated demand, we achieved a sustainable sourcing rate of 98% for the spices within scope. In 2025, we expanded the scope of our sourcing roadmap to include further ingredients. As a result, 53% of the total volume of spices and herbs sourced from high-risk countries is now externally verified.

We conduct our own sustainability audits to monitor compliance with the Paulig Code of Conduct for Suppliers, foster mutual trust, and align sustainability efforts. These audits, combined with external verifications, enhance our due diligence, enabling us to mitigate risks and identify areas for improvement. In instances where adverse impacts on workers' rights are identified through supplier audits, the supplier is required to prepare a corrective action plan to stop, correct and remediate the actual negative impacts. Paulig actively monitors the implementation of these plans to ensure compliance.

In 2025, we conducted eleven audits for suppliers in origin countries, with the primary findings related to the integration of sustainability considerations into upstream supply chain management and health and safety in supplier own operations.

Regarding contract manufacturing, our objective is to ensure that all facilities located in risk areas undergo external verification via Sedex or amfori BSCI. By the end of 2025, audit coverage for these factories was at 88%.

We recognize that preventing modern slavery is a continuous process. We are committed to improving our policies, procedures and practices and working with our suppliers to further understand the risk areas and increase transparency to help mitigate any negative impacts identified. Our Code of Conduct for Suppliers supports this aim by requiring our suppliers to develop an understanding of human rights and environmental risks related to their operations and supply chains. We also expect our supply chain partners to develop appropriate policies and procedures to take action based on the risk assessment. Our policy also sets expectations for all the chains to be traceable concerning the manufacturing and origin of raw materials.

We firmly believe that sustainability is key to ensuring the long-term competitiveness and resilience of European businesses. Legal predictability and policy certainty are essential for investments and competitiveness. We are committed to working together with peer businesses, governmental bodies, and other organisations to benefit from the EU's ambitious sustainability regulatory frameworks.

To strengthen our commitment, we continue to build a holistic human rights management model as an integral part of our supply chain due diligence approach, to train our employees and suppliers on human rights and environmental issues, and to raise awareness through projects that build capabilities in combatting modern slavery and human trafficking directly or indirectly.

This statement has been approved by the Paulig Group Leadership Team.

A handwritten signature in blue ink, appearing to read 'R. Ladau', is positioned above the printed name of the CEO.

Rolf Ladau, CEO, Paulig Group

May 12th, 2026

This modern slavery statement for the financial year ending December 31st, 2024 is made pursuant to section 54(1) of the UK Modern Slavery A