



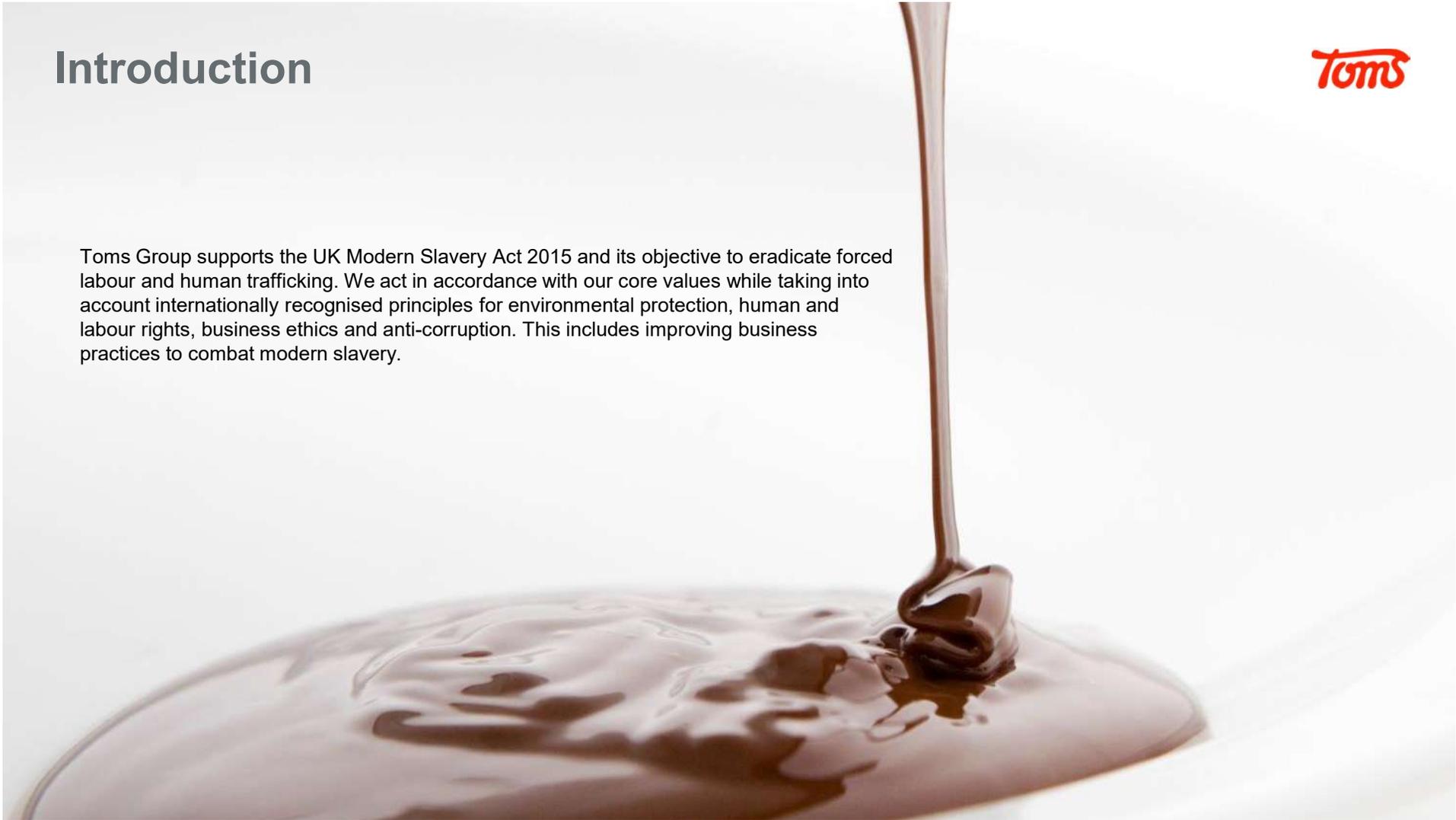
# STATEMENT ON MODERN SLAVERY ACT

Toms Group A/S  
28 March 2017

# Introduction



Toms Group supports the UK Modern Slavery Act 2015 and its objective to eradicate forced labour and human trafficking. We act in accordance with our core values while taking into account internationally recognised principles for environmental protection, human and labour rights, business ethics and anti-corruption. This includes improving business practices to combat modern slavery.



# About Toms Group



- Engaged in the development, production and sales of high quality chocolate, liquorices and sugar confectionery
- Has a comprehensive product range covering all chocolate and sugar confectionery categories
- Owned by Gerda and Victor B. Strand's Trust
- Yearly turnover of DKK 1.8 bill. / USD 320 mill. / EUR 240 mill.  
– of which more than 50 percent is generated outside Denmark
- Production facilities in Denmark (2), Germany (1) and Poland (1)
- Employers: More than 1,100 people, depending on season



# Policies and commitments



We are committed to respecting human rights, and we work consistently to combat any kind of modern slavery in our business and our supply chains. International agreements lay the basis for how we conduct our business in a responsible and transparent manner. We endorse a number of initiatives of relevance to the Modern Slavery Act:

- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- The Universal Declaration of Human Rights
- The ILO Core Declarations

In addition to our Responsibility Policy, we have a number of supporting policies and statements specifying our environmental, social and governance (ESG) commitments, including our Code of Conduct for employees, Supplier Code of Conduct, Human Rights Policy, Diversity Policy and our Whistleblower Scheme.



# Processes and procedures



We have processes and procedures in place to ensure that human rights risks are identified, assessed and addressed. They include the following:

- When tendering new contracts, we assess suppliers to ensure they comply with our responsibility standards. We clarify our requirements in a Supplier Code of Conduct, which also states that suppliers are responsible for setting the same or comparable standards for their subcontractors.
- We have HR management procedures in all countries where we operate to ensure that all employees are recruited lawfully, and we work closely with unions in order to ensure compliance.
- Employees can report possible wrongdoings through our whistleblower scheme.
- Our working environment management system enables us to identify cases involving working environment issues, discrimination and the like.



# Key actions in 2016



## **In 2016, we took the following actions relevant to the Modern Slavery Act:**

### **Employee Code of Conduct**

In 2016 we have finalised an internal Code of Conduct to guide us all through large and small choices in our daily life. It describes what we at Toms believe to be ethical and responsible behaviour. It aims to help us all to always behave properly in our relations with our customers, suppliers, colleagues and society.

Our Code of Conduct is based on the ten principles in the UN Global Compact in order to ensure that this initiative reinforces our compliance with the Global Compact principles. We believe it is essential that our commitment to the Global Compact is not only a statement of intent. Therefore, as part of our Code of Conduct, we have described how our guidelines result in certain specific rules and how they are reflected in actions and decisions.

This is described in an e-learning course, developed in the autumn of 2016, which on an annual basis will train our employees through a series of dilemmas, in how each of them should act towards each other, our customers and other business partners.

### **Whistle-blower scheme**

With the introduction of this Code of Conduct, we have set up an e-mail address ([whistle@tomsgroup.com](mailto:whistle@tomsgroup.com)) to help our employees confidently report serious breaches of the rules which they discover. This internal whistle-blower scheme is being introduced as part of the e-learning programme for the purpose of enhancing a work environment that promotes openness and ensuring that important information is not withheld.



## Key actions in 2016 – continued



### **Due diligence**

To ensure that we do not leave any sub-area of our corporate social responsibility unattended to, we have in addition to these initiatives, conducted the first part of a complete, holistic due diligence process in 2016. We have done this using the UN Global Compact Self-Assessment Tool, which enables companies to scour all procedures, approaches and policies for any non-compliance with the complete set of principles behind the Global Compact.

With this tool, we thoroughly examined the areas of Human Rights and Labour, as well as the area of “Management”, which provides an overview of the company’s governance structures and strategic foundation of the efforts towards responsibility and sustainability. This process confirmed that we meet both our own and external requirements and expectations, and that our planned actions and continued efforts are well chosen.

In 2017 we will finalise this due diligence process by examining the last two areas: Environment and Anti-Corruption.



## More insights



You can find more information on our business and conduct in our Annual Report 2016 including our non-financial annual report Responsibility 2016.

Both are available at our webpage: [www.toms.dk](http://www.toms.dk) where also our policies and Code of Conducts are described and available for download.



# Approval



This statement covers the financial year 1 January 2016 to 31 December 2016.

A handwritten signature in blue ink, appearing to read "Carsten Lyngsø Thomsen".

Carsten Lyngsø Thomsen  
CEO, Toms Group A/S

