



Statement on slavery and human trafficking

2018

DÖHLER GROUP

WE BRING
IDEAS TO LIFE.

NATURAL INGREDIENTS
INGREDIENT SYSTEMS
INTEGRATED SOLUTIONS

The present statement is made pursuant to section 54(1) of the United Kingdom Modern Slavery Act 2015 on behalf of the DöhlerGroup (thus including all legal entities under control of Döhler Group SE, Riedstraße 7-9, 64295 Darmstadt, Germany), hereinafter referred to as “Döhler”. It presents the efforts Döhler has taken and is continuing to take to combat any forms of (modern) slavery and human trafficking within its business and global supply chain.

Business structure and supply chain

Döhler (www.doehler.com) is a global producer, marketer and provider of technology-driven natural ingredients, ingredient systems and integrated solutions for the food and beverage industry. Headquartered in Darmstadt, Germany, Döhler is active in over 130 countries, has more than 6,000 dedicated employees, operates more than 45 production sites as well as has sales offices and application centres on every continent. The product portfolio of natural ingredients ranges from natural flavours, natural colours, health ingredients, cereal ingredients, dairy & dairy-free ingredients, speciality ingredients, dry ingredients,

fruit & vegetable ingredients to ingredient systems. As a family-owned company, Döhler thinks and acts long-term, strives for a lasting business success and recognises its responsibility towards stakeholders, the environment and the society. As a part of the Corporate Social Responsibility (CSR) strategy, various measures are in place to effectively reduce risks and eliminate human rights abuses from business as well as from the supply chain

Policies

As a common ethical standard, Döhler has a Code of Conduct (CoC) in place. The purpose of this standard is to maintain that Döhler acts with integrity in all business relationships, complies with principles on human rights, labour law and environmental protection and operates in accordance with internationally recognized standards. The CoC sets standards for behaviour towards colleagues, business partners and the society, and provides mandatory, worldwide guidance for acting in accordance with the law and in an ethically responsible way -also focusing on modern slavery and trafficking in human beings. In order to pass this responsibility towards the upstream supply chain, Döhler also made this standard mandatory for its suppliers. That is why adherence to the CoC is always an integral part of contract conclusions with them. The CoC is based on core principles

contained in the International Bill of Human Rights, fundamental International Labour Organization Conventions, relevant United Nation Conventions and Guidelines as well as the Ethical Trading Initiative Base Code.

In addition to the CoC, Döhler has a Sustainability Policy in place which sets, besides others, clear targets in terms of social responsibility focusing e.g. on human rights as well as on fostering and accepting the diversity of people.

In order to ensure group wide policy development, implementation as well as adherence to the principles of these policies, Döhler has nominated several functions: Group Sustainability, Group Human Resources as well as local equivalents in the global Döhler operations.

Due diligence, auditing and monitoring

In order to identify, monitor, mitigate and manage sustainability related risks in own operations as well as the supply chain, Döhler sets, besides others, several measures to effectively eliminate human rights abuses. Döhler is a Supplier Ethical Data Exchange (Sedex) member. In this context, independent verifications by Sedex Member Ethical Trade Audits (SMETA 4-pillar, version 6.0 / 6.1) ensure that operations are working in an ethical manner globally recognized by stakeholders and the society. Based on the Döhler Sustainability Goals, operations need to renew the SMETA 4-pillar audit every three years. To also reduce risks in the upstream supply chain, Döhler intends to make these audit procedure mandatory for its suppliers. The SMETA 4-pillar methodology uses the Ethical Trading Initiative Base Code and local law as measurement tools. The SMETA methodology also sets clear criteria on modern slavery and supports due diligence processes for modern slavery prevention. By taking the findings of each audit, Döhler is able to continuously improve social, ethical and environmental performances group wide.

In 2018, Döhler carried out a supplier engagement project in cooperation with Sedex. The aim of this project was to ask preferred suppliers to register on the Sedex Advance platform and to complete the Sedex self-assessment questionnaire (SAQ), which covers topics such as labour (including modern slavery and human trafficking), health & safety, business ethics and environmental issues. Based on the suppliers' SAQ entries, Döhler performed a risk assessment using the Sedex risk assessment tool. The tool highlights areas of risk

across supply chains by assigning a rating of low, medium or high to suppliers' operations. Besides the responses from the SAQ, the tool draws on data from Verisk Maplecroft, a leading global risk analytics company, using a variety of risk indices and multiple indicators to give an overall "inherent" risk profile for each supplier. Döhler will use the results of this risk assessment to further develop our supplier sustainability approach, outlined in the "Future steps" section below.

With regard to responsible sourcing practices, Döhler set an own Agro Sustainability program. Currently, more than 50 agro sustainability projects are running worldwide based on the criteria set by the Sustainable Agriculture Initiative Farm Sustainability Assessment. Besides environmental criteria, a clear focus is laid on requirements and conditions regarding social and ethical risks. By pursuing and further expanding these activities, Döhler is not only able to develop a wide portfolio of sustainable raw materials, but also to reduce social and ethical risks in the upstream supply chain significantly.

To enable internal and external whistleblowing regarding any social, ethical and environmental concern, Döhler sets the possibility to send anonymised messages via the Döhler website. These messages are reviewed by dedicated compliance managers in a fixed process and in cooperation with various internal functions.

Training and communication

On a yearly basis, Döhler trains its employees regarding the CoC via its internal e-learning system. Thus, the awareness for ethical and social topics is kept continuously high. As the CoC is also valid for suppliers, Döhler also requires its business partners to provide training on social and ethical topics

to their staff and business partners.

Regarding internal and external communication, Döhler makes its policies available on its website as well as in the Döhler intranet.

| Future steps

After reviewing the effectiveness of steps taken during the financial year 2018, Döhler will further expand activities to combat modern slavery and human trafficking. In this context, the results of the 2018 supplier engagement project will be used to develop a social compliance & sustainability due diligence programme to be applied to Döhler suppliers. As part of this programme, Döhler will demand SMETA 4-pillar audits (or equivalent audit schemes) from their strategic and preferred suppliers as a mandatory requirement. Döhler will develop a risk-based sustainability due diligence approach for regular suppliers and define specific requirements for high-risk suppliers. This will ena-

ble Döhler to reduce social and ethical risks in its upstream supply chains.

Moreover, Döhler will revise the current employee training regarding social and ethical compliance, in order to educate employees across the Döhler group on topics covered in the Döhler Code of Conduct. It is essential for Döhler to ensure that the Code of Conduct is fully understood and implemented and that there is a common understanding of socially and ethically responsible behaviour in all Döhler operations worldwide.

Approval for this statement

This statement was approved by the Board of Directors on 24.06.2019.



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