

Statement of the Valora Group on the implementation of human rights due diligence in 2023

The Valora Group commits to conducting business in an ethically, legally, environmentally, and socially responsible manner. We place great importance in respecting the human rights of all individuals along the value chain.

In 2023, a Human Rights Due Diligence (HRDD) management approach was developed within the Valora Group that is based on the United Nations Guiding Principles on Business and Human Rights. Valora Group business units fall within the scope of the regulatory requirements of the German Supply Chain Due Diligence Act (LkSG) and the Swiss Ordinance on Due Diligence and Transparency in the Areas of Minerals and Metals from Conflict-Affected Areas and Child Labour (VSoTr). The VSoTr's regulatory obligations regarding conflict minerals do not affect us directly: Valora does not import or process any conflict minerals or metals.

Basic principles

- The [Human Rights Policy](#) was newly adopted as a supply chain policy and is publicly available. HRDD responsibilities have been defined within Valora.
- The [Code of Conduct](#) for Valora's own business operations applies to all persons acting on behalf of the Valora Group. This code documents our values, which we represent internally and externally. Furthermore, it serves as a compass and supports the assessment of situations/actions as right or wrong in everyday work. The guideline covers topics such as human rights and environmental issues, as well as requirements for anti-corruption measures and other related topics.
- The [Business Partner Code of Conduct](#) has been revised and is an integral part of our business relationships. It sets out the minimum expectations Valora has of its business partners in key areas such as human and labour rights, sustainability, culture of lawfulness and information security.

Risk analysis

Valora's business units analysed the human rights risks in their own operations and supply chains, both for direct suppliers (tier 1) and in the deeper supply chains (tier n). This risk analysis is conducted yearly. To determine the risk values of the direct suppliers, countries of origin and product groups are assessed in a structured manner. Various publicly available indices are used, including the UNICEF Children's Rights at the Workplace Index. Valora works with its suppliers to increase supply chain transparency with regard to risks in the deeper supply chain.

Preventive measures

Standard measures have been developed to deal with suppliers at various risk levels, such as requiring an EcoVadis rating, requesting social labels such as Fairtrade and conducting social audits. For example, Valora has been using Fairtrade beans for its own-brand coffee since 2019. Valora is aware that human rights risks - for example in the area of child labour - often have systemic causes. This is why Valora also works collaboratively and is, for example, a member of the Swiss Platform for Sustainable Cocoa.

Complaints mechanism

The Valora Group has a complaints management system through its [Valora Integrity Line](#). This consists of a whistle-blower system and internal processes and responsibilities to fulfil the HRDD requirements. [Publicly available rules of procedure](#) create transparency about the complaints process and, if desired, guarantee the anonymity of whistle-blowers.