

DUNI GROUP (CORP. REG NO. 556536-7844)

Modern Slavery and Human Trafficking Directive

Adopted April 2019

Updated January 2025

Approved by Duni Group CEO
in January 2025

DUNI
GROUP

The Architects of Dining

This statement details the steps undertaken by Duni Group and the parent company Duni AB (Publ) to prevent modern slavery and human trafficking. It relates the activities until fiscal year 2024 and is intended to meet the obligations of Duni Group, including Duni Ltd and Biopac UK Ltd pursuant to the UK Modern Slavery Act 2015.

1. Duni Group

Duni Group (together the “**Group**” or “**we/us**”), supply tabletop concepts, creative packaging and take-away solutions to professionals and consumers.

Duni products, which are mainly single use, are available in more than 40 markets across the world. We are the market leader in Northern Europe with 2,200 employees across 21 countries. Our HQ is in Malmö and we have production units in Sweden, Germany, Poland, Slovenia and Thailand. Duni AB is listed on the NASDAQ exchange in Stockholm.

Duni Group supply chain includes suppliers of raw material to our production units and traded goods. Suppliers are mainly located in Europe, China and South-East Asia.

2. Group Governance and Reporting

Governance takes place through annual general meetings, the Board of Directors, the CEO and the group management. This is in accordance with, among other things, the Swedish Companies Act, the company’s articles of association and the working procedure for the Board of Directors. Given Duni Group structure, the composition of the boards of operational subsidiaries, often with representatives from group management or group finance, also participate in the governance of Duni Group.

Duni Group applies the Swedish Code of Corporate Governance.

Through our governance structure, group management makes yearly risk analyses. Duni AB Board’s audit committee conducts annual reviews of the company’s operational and financial risks based on the risk analysis conducted. This also includes environmental risks as well as risks related to entry into new markets, anti-corruption, fraud and social aspects such as conditions from a labor law and diversity perspective. Duni Sustainability Steering committee consists of group management members and relevant operational managers. The steering committee oversees sustainability governance and drives our sustainability agenda.

Duni AB provides an annual report according to the rules of a public company. From fiscal year 2019 this includes our Sustainability reporting.

Duni Group has been a member of EcoVadis sustainability rating platform since 2018. The platform has a strong focus on supply chain management. Duni Group has a gold rating for our overall performance.

3. Group Policies

The Duni brand has a good reputation for the quality and safety of its products. This reputation has been built up over many years. In order to maintain this reputation, there are strict consumer safety, quality, environmental, occupational safety and social standards to which all Duni factories must adhere. Third-party producers of Duni-branded products or raw material suppliers also have to achieve these standards.

Duni Group sites and our suppliers must operate in full compliance with national laws in the respective country. The group's social responsibility can, however, have requirements exceeding those of national laws.

The Duni Group policy book was revised in 2022 and now follows the ESG reporting agenda. The new policy book is steered by three overarching documents, consisting of a Code of Business Conduct, a Business Partner Code of Conduct, and a Policy Governance Document. All policy documents are categorized into the areas of Environmental, Social and Governance.

Duni Group Code of Business Conduct reflects the minimum standard of our Social Responsibility, from a worker and human rights perspective. The code defines the basic rights of employees, based on ILO Conventions. This includes, through ILO conventions 29 and 105 prohibiting the use of involuntary or uncompensated labor of any kind, including prison labor. Foreign contract workers must not be required to remain employed for any period of time against their own will. The production facility must pay any recruitment fees and other commissions to the recruitment agency.

The code further states that it is of utmost importance that Duni Group business operations are characterized by the highest possible standards of responsibility, openness, and honesty. Duni shall be operated profitably while maintaining good ethics and condemns any form of corruption and bribery.

Duni Group Whistleblower Policy has been effective since 2016 and has been revised in 2022 and 2024 in accordance with new legal requirements. The group aspires to an organizational climate where whistleblowers feel confident and comfortable about reporting wrongdoings.

We believe that there is an obligation to deal with wrongdoings. Reporting wrongdoings is in accordance with our ethical guidelines. Further, Duni Group believes that whistleblowers, who come forward with reports of wrongdoings, are acting as exemplary organizational citizens by assisting us in promoting integrity, accountability, and good management.

The group has engaged an external party as the receiver of the raised concerns. This external party will report raised concerns to the group for further handling and investigation. Reports may be made anonymously.

4. Responsible sourcing

SUPPLY CHAIN MANAGEMENT

Duni Group has two different supply chains depending on the product category:

- Inhouse Production of primarily napkins and table covers.
- Traded goods of primarily food packaging for take away, candles and lights.

Our procurement function is divided according to our supply chains and are located in Sweden, Poland, Germany, Singapore, Australia and the UK.

RESPONSIBLE SOURCING PROCEDURE

To ensure compliance with the Duni Group Code of Business Conduct, initial and periodic audits of suppliers of finished goods are conducted. Suppliers of raw material are evaluated from a risk and strategic perspective.

All suppliers of finished goods and raw materials sign the Duni Group Code of Business Conduct. In supplier contracts, breach of these policies is set as valid ground for annulment of contract.

No supplier of finished goods is accepted without prior evaluation based on our Business Partner Code of Conduct. Duni Code of Conduct audits and re-audits are conducted based on result of audit and risk area of the supplier. In high-risk areas as per our risk assessment, audits are conducted more frequently. During audits, worker contracts, age, salaries and working hours are checked. Migrant workers must have access to their passports. Worker interviews are carried out in the local language without management presence.

SUPPLIER EVALUATION AND RISK ASSESSMENT

Supplier countries are evaluated from a risk perspective. Corruption perceptions index from Transparency international is the base for the risk rating where the top 25 % for low corruption are set as low risk. When entering new countries, more detailed risk assessments are carried out with external consultants.

The Duni Group General Requirements for Suppliers of Finished Goods and Raw Material details the standard that we expect our suppliers to adhere to. In the document, some criteria are set as critical such as contract and wage management, child labor and access to passports. Critical findings need to be acted on immediately. Suppliers that fail to act on critical requirements will be phased out.

Duni Group Sustainability Steering Committee gets regular reports on supplier performance and phasing out process. The committee decides in individual cases when necessary.

SUPPLIER DIALOGUE AND TRAINING

Duni Group strives to have a close relationship with our suppliers, based on mutual respect and understanding. Most suppliers have been working with the group for many years. The group supports with training on sustainability matters in cooperation with suppliers.