

## Anti-slavery and Human Trafficking Policy

*Konings are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.*

### 1. Introduction

We have a responsibility both as a business and as individuals to tackle any form of modern slavery. We will not tolerate, facilitate or condone any form of modern slavery across Konings or throughout our supply chains. This is supported through the communication to, and compliance of, our employees, suppliers and third-party providers with the Anti-slavery and Human Trafficking Policy.

Konings are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy does not form part of an employee's contract of employment, and we may amend it at any time.

### 2. Purpose and scope

The purpose of this policy is to communicate and establish controls to ensure compliance with all anti-slavery and human trafficking regulations as well as ensuring alignment to Konings' ethical standards and Code of Conduct.

This policy applies to all Konings' employees, suppliers and third-party providers and is intended to ensure that all are aware of the responsibilities they hold.

We also have several policies, and statements relevant to modern slavery which should be read in conjunction with and supplement this policy. These include our Code of Conduct, Ethical Trading Initiative (ETI) Base Code and Whistleblowing Policy.

### 3. Responsibility for the policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Konings Group Human Resources Director has primary and day to day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## 4. What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced compulsory labour, child labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As product manufacturing and distribution supply chains are often complex, we must address the eradication of modern slavery throughout our entire supply chain and not just focus on the end product. We must also consider our third-party and service providers employed to support both the product and service offer we give our customers and stakeholders.

There is no typical victim of modern slavery, and some victims do not understand that they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents
- The person acting as though they are being instructed or coached by someone else
- The person allows others to speak for them when spoken to directly
- The person is dropped off and collected from work
- The person avoids eye contact, is withdrawn or appears frightened
- The person does not seem to be able to contact friends or family freely
- The person has limited social interaction or contact with people outside of their immediate environment

The above list is not exhaustive. A person may display a number of indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

## 5. Our policy

Our policy does not allow for any form of slavery or human trafficking, and we will take proactive steps to ensure that modern slavery is not taking place in any part of Konings' business or supply chains.

We will not engage with organisations which facilitate any form of slavery including the use of child labour or forced labour, or which do not recognise freedom of association.

We require that the suppliers and third parties we work with should hold their own suppliers and third parties to the same standards.

We seek to continually improve awareness of the practices necessary to combat slavery and human trafficking and assess the risk profile of our business in these areas.

Our zero-tolerance approach to modern slavery includes our commitment that:

- We will not allow any form of slavery or human trafficking to take place in any part of our business
- We will not use child labour, nor will we use forced labour
- We recognise freedom of association by permitting our employees to establish and join organisations of their own choosing without our permission
- we will comply with all relevant laws, statutes and regulations relating to modern slavery

- we will publish modern slavery statements in accordance with the relevant legislation
- we require our suppliers and third-party providers to comply with the above; and to hold their own suppliers and third parties to the same standards
- we will seek to educate and raise awareness across our business in the identification and reporting of modern slavery

## 6. Compliance

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to or suggest a breach of this policy.

You must notify Human Resources and the Site Leader as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Individuals are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify Human Resources and the Site Leader as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Konings are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform Human Resources and the Site Leader immediately.

## 7. Reporting modern slavery

Employees, suppliers, and third-party providers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest a breach of this policy.

If you are a Konings employee, supplier, or third-party provider you must report any incidence or suspicion of modern slavery and/or human trafficking in any part of our business or supply chain to Human Resources and the Site Lead.

Alternatively, employees can report any concerns using Konings' Whistleblowing Policy. We encourage openness and will support anyone who raises genuine concerns with Konings' Whistleblowing policy.

As well as employees, suppliers and other business partners can confidentially report any serious concerns by email to: [compliance@koningsdrinks.com](mailto:compliance@koningsdrinks.com). Reports are treated in accordance with our Whistleblowing policy, acknowledged and acted upon as appropriate.

## 9. Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 10. CEO confirmation

July 22<sup>nd</sup> 2024

A handwritten signature in blue ink, consisting of several overlapping loops and a vertical line, positioned above the name Jos Rutten.

Jos Rutten,  
CEO Konings Group