



Dragsbæk

# Modern Slavery Act

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## Company

This statement applies to **The Dragsbæk Group** (Central business register: Dragsbæk A/S: 89318718; Blume ApS: 29218684; Grønvang Foods ApS: 19039889; Naturlig Foods A/S: 25476573; Scandinavian Retail Food A/S: 10107156; VMG Food: 1081038). The Dragsbæk Group is a subsidiary of Orkla ASA, a leading Nordic supplier of consumer branded goods.

Dragsbæk Group is a modern margarine and food company headquartered in Thisted, Denmark, where we have manufactured margarine and blended products since 1923. Dragsbæk manufactures and delivers a variety of food-products to retail and industrial customers such as ice cream, fats and oils, UHT products and traded goods.

The Dragsbæk Group employ around 265 employees at our Danish and Lithuanian sites.

The information included in this statement refers to the financial year ending 31 December 2023 when our turnover was 270 mio. EUR.

## Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## Commitment

The Dragsbæk Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We have a zero-tolerance approach to modern slavery and 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.

No labour provided to the company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Dragsbæk Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation, Orkla Human and Labour Rights Policy, Orkla Business Partner Code of Conduct and the globale minimum safeguards as its is described in United Nations Guiding Principles (UNGPs) and OECDs guidelines for Multinational Enterprises.

## Our Policies on Slavery and Human Trafficking

Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We are committed to the following practices:

- **Stringent** vetting and investigation of our supply chain (suppliers, contractors, sub-contractors, policies, contracts etc)
- **We will continually evaluate** and audit the ethical standards of our suppliers within our product supply chains
- **All Suppliers** are requested to sign our Supplier Code of Conduct
- **All Suppliers** are requested to fill in our product questionnaires for suppliers
- **We are member of SEDEX and EcoVadis** and invite our suppliers to be members to one or both of the organisations
- **Continually audit and review** our practices for checking all supplier's employees are paid at least the minimum wage and have the right to work
- **Encourage the reporting of concerns** and the protection of whistle blowers
- **We will not knowingly support** or deal with any business involved in slavery or human trafficking
- **We will continue to conduct training** for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain
- **Conduct annual risk assessment** in line with Orkla's Human Rights and Responsible Employer Policy
- **Continually improve** our policies and processes.

Additional policies which provide further information to ensure awareness and to permit any concerns to be raised include:

- 1 **Orkla Sustainability and responsible business practices**
- 2 **Orkla Business Partner Code of Conduct**
- 3 **Orkla Supplier Code of Conduct**
- 4 **Orkla Human and Labour Rights Policy**

## Due Diligence Processes with our suppliers

As part of our initiative to identify and mitigate risk wherever possible, we build long term relationships with all our suppliers which enables a clear and deep understanding of our business values and makes clear our expectations of business behavior and what we expect from our suppliers.

As a business unit of Orkla ASA, our suppliers are required to abide by Orkla's Supplier Code of Conduct that is based on the Universal Declaration of Human Rights, the ETI Base code, to which Orkla is committed.

Additionally, Orkla has implemented a mandatory Supplier Portal to ensure that all suppliers go through an approval process that includes a risk evaluation based on the following six risk factors:

- **Compliance Risk**
- **Food Safety and Safe Products**
- **IT Security**
- **Financial Risk**
- **Sustainability Risk**
- **Privacy**

The risk assessment process is supported utilizing company information retrieved from Bureau Van Dijk.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we look to provide training to our staff as required. We will also require our business partners to provide training to their staff and suppliers and providers where there is a perceived risk.

## Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPI's) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Annual due diligence process** and risk assessment in line with Orkla's Human Rights and Responsible Employer Policy.
- **Completion of Supplier Audits** or Supplier Visits, if the risk assessment indicates breach or possible breach of The Modern Slavery Act or UNGPs.
- **The Dragsbæk Group** has a recognized HR function, to whom all concerns regarding modern slavery should be addressed and who will then undertake relevant action regarding the company's obligations.
- **Annual non-financial CSR- reporting**, where Dragsbæk Group accounts for the company's anti-slavery and human rights work.

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2023.*

Thisted, 04. March 2024.