



## Annual Statement: Modern Slavery Act

*Ferrara Candy UK Limited Statement pursuant to Section 54(1) of the UK Modern Slavery Act 2015*

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**Entity Name:** Ferrara Candy UK Limited

**Financial Year Reporting Period:** January 1, 2024 – December 31, 2024

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As a value-driven organization committed to inspiring sweetness, Ferrara Candy UK Limited ("Ferrara UK"), a subsidiary of Ferrara Candy Company ("Ferrara"), recognizes its responsibility to respect and support human rights. Operating with integrity and empathy is at the core of Ferrara UK's business, and doing so requires considering and taking action to protect human rights in our own operations, throughout our value chain, and in the communities in which we and our business partners operate.

### I. Introduction to the Business

Ferrara UK is a subsidiary of Ferrara, a privately held confectionery business based in North America with headquarters in Chicago, Illinois. Ferrara manufactures and sells sugar confections under numerous brand names, including but not limited to NERDS®, SweeTARTS®, Trolli®, and LaffyTaffy®. Ferrara utilizes a global, multi-tiered, upstream supply network to procure raw materials, packaging, and other goods and services, primarily from North and South America, Asia, and Europe. Ferrara UK engages in the sale of Ferrara products in the UK. Ferrara's policies and procedures regarding human rights and anti-slavery apply to Ferrara UK.

The Ferrara UK financial year relevant to this report is January 1, 2024 to December 31, 2024.

### II. Policies

Ferrara's Human Rights Policy, Supplier Code of Conduct, and Code of Conduct detail Ferrara's approach to and requirements related to human rights, including human trafficking, modern slavery, and forced and child labor. Compliance with these policies and codes is collaboratively managed among Ferrara's Human Resources, Legal, Sustainability, and Procurement departments.

Ferrara's [Human Rights Policy](#), which is based on and aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), identifies salient human rights issue areas and demonstrates the corporate commitment to engage in human rights due diligence throughout owned operations and the supply chain.

The [Supplier Code of Conduct](#), which is included in all Ferrara supplier contracts, sets the standards that Ferrara's suppliers must follow pertaining to human trafficking, forced labor, and child labor. The Supplier Code of Conduct explicitly prohibits Ferrara suppliers from using all forms of prison labor, forced labor, bonded



or indentured labor, slavery, or human trafficking, and requires suppliers to conduct due diligence into their own supply chains to ensure the absence of such labor violations.

Ferrara's employee-facing [Code of Conduct](#), which all employees must review and certify each year, includes relevant provisions related to human trafficking and human rights labor abuses.

### **III. Due Diligence Processes**

In 2023, Ferrara retained an external subject matter expert to conduct a human rights risk and saliency analysis. The analysis identified seven key risk areas, each with multiple impacts. During the reporting period, Ferrara gathered further detail about these risks, identified knowledge gaps to fill, and established a cross functional governance committee responsible for managing continued human rights impact assessment, prevention, response, and remediation.

Ferrara operates an anonymous grievance mechanism, the Ethics and Compliance Hotline, through which individuals can communicate concerns about social or ethical abuses and other violations occurring in Ferrara's operations or supply chain. Use of the Hotline is available to all stakeholders, including Ferrara employees and suppliers. Complaints made to the Hotline are formally investigated by Ferrara's Office of Ethics and Compliance.

Ferrara conducts annual social audits of its high-risk suppliers. Ferrara hires independent, trained third-party auditors to assess whether Ferrara's policies and its Supplier Code of Conduct are effectively implemented and whether suppliers are compliant with relevant laws. If Ferrara becomes aware of any actions, circumstances, or conditions not in compliance with the Supplier Code of Conduct, Ferrara will work with suppliers to find corrective solutions; otherwise, Ferrara will modify its dealings with the suppliers, terminating the relationship if necessary.

Ferrara has begun implementation of a vendor due diligence tool that scans the Dow Jones database to flag any improprieties or unlawful conduct, including those related to modern slavery, related to our vendors. Ferrara assesses each flag to determine risk and potentially reject partnering with the vendor, such as instances where we confirm the vendor engages in modern slavery practices.

### **IV. Assessing and Managing Risks**

Ferrara has identified multiple agricultural commodity supply chains relevant to its business that carry a risk of forced labor. Forced labor has been identified as a risk in the production and/or harvesting of these commodities: carnauba, cocoa, palm, and sugarcane. Ferrara uses multiple approaches to manage these risks, including sourcing materials that are independently certified to be produced without slavery or human trafficking and working with suppliers to identify production regions and practices.

Ferrara is aware that practices at distant suppliers, into which Ferrara has no visibility and with which it has no direct contact, may pose human rights risks that need to be addressed. In this vein, Ferrara plans to build upstream visibility and

## V. Measuring Effectiveness

During the reporting period, Ferrara began to publish anonymized data related to submissions to the Hotline grievance mechanism. Ferrara will continue to increase transparency and communication around its human rights due diligence efforts and their effectiveness.

## VI. Training

This statement has been approved by the Ferrara UK Board of Directors on June 6, 2025.

June 2025