



A Commitment to Human Rights

As a value-driven organization committed to inspiring sweetness, we recognize our responsibility to respect and support human rights. Operating with respect and responsibility is at the core of Ferrara'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.

Ferrara's approach to human rights is substantially informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs), a global standard detailing the role businesses play in identifying, preventing, and addressing human rights risks. In accordance with the UNGPs, Ferrara has identified its most salient human rights risks and has begun work to mitigate and address potential impacts.

As in many other aspects of business, protecting human rights requires collaboration, and meaningful action cannot be achieved by one individual alone. We ask all our employees and partners to join us in our efforts to prioritize and ensure the wellbeing, dignity, and rights of all people.



Marco Capurso
Chief Executive Officer
Ferrara Candy Company



Heather Boggs
Chief Innovation Officer
Ferrara Candy Company



Kevin Lall
Chief Legal Officer
Ferrara Candy Company

Ferrara Candy Company Human Rights Policy

1. Purpose and Scope

The purpose of this Human Rights Policy (hereinafter, the “Policy”) is to express Ferrara Candy Company’s, its subsidiaries’, and its affiliates’ (collectively referred to as “Ferrara” or “us, “we”) active and continuous determination to meet its responsibility to respect and support internationally recognized human rights standards. Two of Ferrara’s driving values—respect and responsibility—are centered on people and naturally require consideration of and action to protect human rights. Ferrara is committed to protecting human rights in our own operations, throughout our value chain, and in the communities in which we and our business partners operate. We are committed to sharing delight in every bite, and this mission cannot be achieved without prioritizing the wellbeing, dignity, and rights of all people.

Ferrara’s Human Rights Policy is based on the foundational principles of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and concepts of the United Nations Universal Declaration of Human Rights. Ferrara has also aligned its Global [Code of Conduct](#) and Global [Supplier Code of Conduct](#) with this Policy and expects all employees, suppliers, contractors, and vendors to comply with the human rights standards, principles, and priorities detailed herein.

2. Ferrara’s Human Rights Priorities and Standards

Ferrara is committed to complying with all relevant laws, respecting and protecting human rights, and providing access to remedies where violations of human rights are suspected or identified. While the complex global confectionery industry presents numerous potential human rights issues, we have identified the following priority impact areas as most relevant to our current operations:

2.1. Freedom from Forced, Prison, and Child Labor: All forms of forced, prison, or child labor are prohibited in our own operations and throughout our value chain.

2.2. Right to Just and Favorable Working Conditions: We comply and require supplier partners to comply with all applicable minimum wage and working hour laws, with the aim of providing fair compensation and rest. We strive to provide fair and favorable conditions to all employees across our manufacturing and corporate work environments.

2.3. Right to a Safe, Secure, and Healthy Work Environment: We prioritize the health and safety of our employees by providing safe, accessible, well-resourced working environments and require our suppliers to do the same.

2.4 Freedom from Discrimination and Harassment: We respect diversity and inclusion and we do not tolerate harassment or discrimination in hiring, employment, or other operational practices on any basis, including but not limited to race, religion, sex, gender, age, ability, or national origin, and we expect our suppliers to do the same.

2.5. Right to Privacy: We appreciate the variety of risks posed to employee and consumer data in the digital age. Therefore, we follow best-in-class processes to protect data against security risks and continuously evaluate ways to improve our protocols to better respect the privacy of our consumers and employees.

2.6. Right to Health and Responsible Marketing: We respect our consumers' right to accurate information related to the nutrition and health of our products and comply with regulations to ensure responsible marketing to children.

2.7. Right to a Safe, Sustainable, and Healthy Environment: We firmly believe that all humans have the right to safe, accessible natural resources and a sustainable environment. Consequently, we are committed to minimizing our adverse impacts and protecting the global environment. We expect our partners across the value chain to share this commitment, work to reduce adverse impacts, and contribute to the protection of the environment.

3. Delivering on Our Commitments to Human Rights

Due Diligence

Recognizing that human rights due diligence plays a critical role in the transparent and effective operation of this policy, we use our Responsible Sourcing Standard Operating Procedure (RS SOP) to monitor compliance with this policy and ensure that Ferrara is working collaboratively with suppliers to uphold respect for human rights in our supply chain. The RS SOP provides a framework for identifying, mitigating, and managing risks in our supply chain.

We use a variety of tools to conduct risk-based due diligence in our value chain, including risk assessments, self-assessment questionnaires, and third-party ethical audits. We also consult independent third parties where appropriate and use continuous monitoring software to detect improprieties such as sanctions or regulatory investigations. Supplier audits are conducted by an independent third party at a frequency informed by risk (e.g., high-risk suppliers are prioritized for more frequent audits). Successful due diligence requires collaboration with and cooperation from our suppliers. (More details about supplier expectations and data sharing requirements are available in our Global Supplier Code of Conduct.)

Ferrara treats violations of this policy and our Global Supplier Code of Conduct seriously, and we are committed to taking appropriate action in a timely manner. Ferrara prioritizes working collaboratively with suppliers to resolve any issues they may have with complying with our policies. In the event of repeated non-compliance and where all other options have been explored without success, Ferrara reserves the right to terminate supplier relationships.

Monitoring

Ferrara monitors the implementation of this policy and evaluates the effectiveness of our due diligence processes by regularly tracking and internally reporting against key performance indicators. Monitoring and evaluation data is used to assess progress and identify opportunities for process improvement.

Governance

Ferrara's Senior Leadership team is responsible for overseeing the implementation of this Policy. Ferrara's Legal, People and Organization, Procurement, EHS, Manufacturing, and Sustainability departments are collectively responsible for engaging with internal and external stakeholders on the implementation of this Policy and adherence to the standards set out herein.

Expectations of Employees

We require our employees to adhere to this policy and the RS SOP and to collaborate with approved suppliers accordingly. Procurement staff are trained on issues regarding forced labor and child labor, supplier risk management, and our responsible sourcing process. All Ferrara employees are required to review and acknowledge relevant provisions in Ferrara's Global Code of Conduct—which includes issues regarding human trafficking, child labor, and forced labor—on an annual basis.

Access to Remedy

Ferrara provides an Ethics and Compliance Hotline (available via telephone and online) for all Ferrara employees; employees of suppliers, co-manufacturers, and other related businesses; and any member of the public to anonymously report incidents and file complaints related to Ferrara working conditions, policy violations, violations of applicable laws, and other human rights and social concerns. All reported complaints are formally investigated by Ferrara's Office of Ethics and Compliance. Ferrara will investigate reported incidents impartially, work with stakeholders to resolve complaints within reasonable timeframes, and communicate outcomes to affected stakeholders. Ferrara does not tolerate retaliation taken against any individual or entity who makes a good faith allegation or report to the Hotline.

If a reported issue concerns one of Ferrara's suppliers, the supplier will be informed that Ferrara is investigating the issue and corrective actions may be required to promptly remediate the issue. Ferrara expects its suppliers to actively engage in the remediation process and execute corrective actions in a timely manner.

Reports can be made anonymously at ethicsandcompliance@ferrara.com, by calling 800-461-9330, or at the webpage ferrara.bz/ECHotline.

External Reporting

To support transparency, accountability, and continuous improvement, we report publicly on our responsible sourcing progress under mandatory reporting laws such as the California Transparency in Supply Chains Act and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

4. Conclusion

At Ferrara, we believe that respecting and promoting human rights is not only a moral imperative but also a fundamental aspect of responsible business conduct. We are committed to integrating human rights considerations into all aspects of our operations and to working collaboratively with our stakeholders to create a world where human rights are universally respected and upheld.

5. Policy Ownership

This Policy will be reviewed and updated at least every three years. Updates to this Policy will be posted on <http://www.ferrara.com>. For any queries about this policy, please contact sustainability@ferrara.com.

6. Related Resources

- Ferrara's Global [Code of Conduct](#)
- Ferrara's Global [Supplier Code of Conduct](#)