



LINDT & SPRÜNGLI

Modern Slavery Statement 2024

Australia, Canada, and United Kingdom

For the reporting period: January 1 – December 31, 2024

Contents

About this statement	2
Structure and operations, supply chain, governance	3
Risks of modern slavery practices in the operations and supply chains of the reporting entities	6
Actions taken to assess and address modern slavery risks	8
Remediation measures	16
Training and capacity building	17
Effectiveness of actions being taken to assess and address modern slavery risks	18
Australia-specific actions	19
Approvals and attestation	20
Appendix 1: Overview of reporting entities	21
Appendix 2: Reporting criteria	22

About this statement

This statement is prepared in accordance with Australia's Modern Slavery Act 2018 (Cth) ("**Australian MSA**"), Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act ("**Canadian Act**"), and part 6, section 54 of the United Kingdom's Modern Slavery Act 2015 ("**UK MSA**").

This statement is made on behalf of three Lindt & Sprüngli entities that report under the aforementioned laws. The reporting entities are Lindt & Sprüngli (Canada) Inc. ("**Lindt Canada**") reporting under the Canadian Act, Lindt & Sprüngli (Australia) Pty Ltd¹ ("**Lindt Australia**") reporting under the Australian MSA and Lindt & Sprüngli (UK) Ltd. ("**Lindt UK**") reporting under the UK MSA (together, the "**Reporting Entities**"). An overview of each reporting entity and the law which it is reporting under can be found in [Appendix 1](#).

Lindt Canada, Lindt Australia and Lindt UK are subsidiaries of Chocoladefabriken Lindt & Sprüngli AG, which is based in Switzerland (as a group together with its subsidiaries "**Lindt & Sprüngli**" or "**Group**"). Unless stipulated otherwise, all references to "**we**", "**us**", "**our**" are references to Lindt & Sprüngli.

Lindt & Sprüngli has established global policies and processes related to human rights that are uniformly applied to the Reporting Entities. In addition, the Reporting Entities source their production inputs from a combination of related entities of the Lindt & Sprüngli Group and third-party suppliers. Bulk and finished chocolate products are imported by the Reporting Entities from related overseas subsidiaries of Lindt & Sprüngli.

For these reasons, this document provides a consolidated description of Lindt & Sprüngli's actions to assess and address the risks of modern slavery. The statement has been prepared jointly with all Reporting Entities and has been approved by the Reporting Entities' competent corporate bodies, as set out in the [Approvals and attestation](#) section of this statement, and is available online on the respective entities' website.

Lindt & Sprüngli is committed to respecting human rights. This entails implementing a due diligence process aimed at preventing, mitigating, or ceasing adverse human rights and environmental impacts throughout the organization and our supply chain, including all forms of modern slavery, forced labor and child labor. Modern slavery is a persistent and complex challenge, and combating it requires ongoing effort. We recognize that eliminating modern slavery in commodity supply chains cannot be achieved by Lindt & Sprüngli alone. It requires continuous improvement and ongoing collaboration within the sector, with our suppliers, as well as peers and other stakeholders, to address systemic issues and develop common solutions. The statement provides information on the efforts, action plans and progress to identify and address the risks of modern slavery in the operations and supply chains of Lindt & Sprüngli. Modern slavery encompasses situations of exploitation which individuals cannot refuse or escape due to threats, violence, coercion, deception, or abuse of power.²

Our annual Sustainability Report serves as the primary public document detailing the Group's human rights due diligence efforts, action plans, and progress. For additional comprehensive information, please refer to the Sustainability Report 2024 available on our [corporate website](#).

1. Lindt Australia acknowledges the Traditional Owners of country throughout Australia and recognizes their continuing connection to land, water, and culture. We pay respects to their cultures and to their Elders past, present, and emerging.
2. Walk Free, 2022, "[Modern Slavery Response & Remedy Framework](#)".



Structure and operations, supply chain, governance

Structure and Operations

Lindt & Sprüngli has been enchanting the world with chocolate for 180 years. The long-established Swiss company with its roots in Zurich is a global leader in the premium chocolate product sector. Lindt & Sprüngli produces quality chocolates today at its 12 factories in Europe and the USA. Its products are sold by 38 subsidiaries and branch offices in around 560 of its own stores as well as via a network of more than 100 independent distributors around the globe. With around 15,000 employees, the Lindt & Sprüngli Group reported sales of CHF 5.47 billion in 2024. Our commitment to contributing to a more sustainable tomorrow is a key element driving the company's actions and ambitions. For the responsible sourcing of its most important raw material cocoa, the company launched its own program in 2008: the Lindt & Sprüngli Farming Program.

Lindt Australia, Lindt Canada, and Lindt UK are the sole Australian, Canadian, and UK entities of the holding company Chocoladefabriken Lindt & Sprüngli AG. They do not own or control any further entities.

Main business activities of the Australian, Canadian, and UK entities include marketing and selling of premium chocolates for local consumption, importing and re-packaging bulk and finished chocolate products from other subsidiaries of Lindt & Sprüngli, running local production and packing, and distribution. The entities operate under Group-wide frameworks, policies, and procedures, but implement local laws, regulations, and statutory requirements where applicable, ensuring compliance through additional local policies and procedures.

As of December 31, 2024, Lindt Australia employed approximately 580 people in total across its businesses – split into head office administration and support roles, production and packing, merchandising and sales support roles, and retail sales roles. In addition, Lindt Australia engaged third party labor providers to supply services in production and packing. Lindt Canada employed approximately 350 employees and engaged third party labor providers to supply services in retail stores, merchandising and logistics operations. Lindt UK employed approximately 520 people in total across its business, split into Head Office, Retail and Field Sales/Merchandising teams. Lindt UK also engages with third party labor providers to support its business.

Structure and operations, supply chain, governance continued

Supply Chain

Lindt & Sprüngli operates an integrated supply chain model with thousands of suppliers globally. Lindt Australia, Lindt Canada, and Lindt UK source their production inputs from a combination of related entities of Lindt & Sprüngli and third-party suppliers. Bulk and finished chocolate products are imported from related overseas subsidiaries of Lindt & Sprüngli, and therefore cocoa and various other key raw materials are sourced directly by Group Procurement and other major production sites of other subsidiaries. For further information on the sourcing of our priority raw materials, see the Responsible sourcing chapter of our [Sustainability Report 2024](#) and for cocoa sourcing the Lindt & Sprüngli [Cocoa Supply Chain Disclosure](#). Additional production inputs in the form of goods and services are sourced directly through the subsidiaries and include raw materials, packaging materials, and other support services such as warehousing and transport. The supplier base of the three subsidiaries include local and international suppliers, contractors, and providers.

Our value chain

We continually identify and satisfy customer preferences and cooperate with our partners along the value chain to contribute to a sustainable tomorrow.

**Sourcing**

We are committed to responsible sourcing of our raw and packaging materials. Our focus is on our most important raw material, cocoa, and our other priority materials.

**Transportation**

Raw and packaging materials are traded, stored, and then transported to our production sites.

**Production**

The production process starts in our in-house cocoa mass production sites, where cocoa beans are processed into cocoa mass. Cocoa mass is the defining ingredient for our chocolates, which we mold, refine, and pack in our chocolate production sites.

**Retail**

We sell our products to consumers through our own shops, own websites, and via our retail partners offline and online.

**Consumption**

We provide our consumers with premium chocolate products and anticipate trends. We take care to fulfill consumer expectations, creating responsible and transparent marketing material that reflects our values and helps consumers make informed choices about their buying and consumption habits.



Structure and operations, supply chain, governance continued

Governance

The Group's top management, including the Board of Directors and Group Management, deals with matters related to sustainability, reflecting the significance of sustainability impacts, risks, and opportunities to the Group. The Sustainability Committee of the Board guides the Board in setting the strategic direction and sustainability targets for company activities, as well as in aligning financial interests, business strengths, and social and environmental interests. Group Management is responsible for the implementation of the Board's strategic sustainability decisions. The CFO oversees and guides the management of our material sustainability matters, strategies, and targets, and provides updates to Group Management at least quarterly. The CFO also chairs the Executive Sustainability Committee, which is composed of the Group General Counsel as well as the Group Management member responsible for Operations and which meets quarterly. The Head of Group Sustainability reports to the CFO and chairs the Sustainability Leadership Team, a body consisting of heads of different functions who report to Group Management or their deputies. This team, supported by the Group Sustainability department, meets quarterly and is responsible for steering the implementation of the Sustainability Plan. The Lindt & Sprüngli Human Rights Working Group (HRWG) is a cross-functional sub-committee of the Sustainability Leadership Team.

It is chaired by the Human Rights Officer and composed of senior representatives of Cocoa Sustainability, Global Procurement, Group Human Resources, Global Environmental Health & Safety, and Group Legal Affairs. Together, the working group is responsible for guiding the company's human rights due diligence strategy, driving its implementation and supporting efforts to embed it throughout the organization and our supply chain. The HRWG meets quarterly to maintain the strategy, oversee performance, and review and guide appropriate action in response to human rights risks.

Australia, Canada and UK

The Chief Executive Officers (CEO) of Lindt Australia, Lindt Canada, and Lindt UK have total responsibility for the day-to-day business of the respective entities. The CEO is aided by members of the Executive Committee which includes Chief Financial Officer (CFO), Operations Director/Head of Sustainability, HR Director, and other senior executives.

At Lindt Australia, the CFO has executive responsibility for the procurement function. The Procurement Manager, coordinating with a multifunctional working group on modern slavery matters, is responsible for day-to-day running of activities to deliver on modern slavery awareness, compliance requirements and improvement. The Operations Director is also Head of Sustainability and has executive responsibility for the implementation and delivery of the local action plan of the Group's Sustainability Plan, Lindt & Sprüngli's sustainability strategy, including the areas of business integrity and human rights. At Lindt Canada, the Vice President (VP) of Supply Chain has the executive responsibility for leading activities pertaining to human rights topics, including the Canadian Act. As of 2024 the role of Sustainability Manager has been created to ensure increased focus on sustainability issues including human rights. Lindt UK has two members of the leadership team that assume responsibility for modern slavery. The People & Culture Director has overall responsibility for the adherence to labor laws including working time, eligibility to work checks, and auditing external agency suppliers. The Supply Chain Director has overall responsibility for third-party logistics providers, working in conjunction with the Head of Sustainability who has responsibility for the implementation and delivery of the local action plan of the Group's Sustainability Plan, Lindt & Sprüngli's sustainability strategy, including the areas of business integrity and human rights.



Risks of modern slavery practices in the operations and supply chains of the reporting entities

We recognize that our business activities have an impact on the human rights of the individuals and communities in which we operate. As a company, we are committed to respecting human rights, in our own operations and supply chain, and we aim to ensure that no one is harmed by our activities.

Risk assessment

Lindt & Sprüngli conducts an annual risk analysis, to identify, weigh, and prioritize human rights and environmental risks in our operations and direct and indirect (tier 2+) supply chains, with support from third-party experts.

The analysis considers the severity (scope, scale, and irremediability) and likelihood of risks, their relevance to business units and supply categories and geographic risks, with input from third-party indices.

Our assessment of risks is informed by industry knowledge, specialty risk assessments, concerns raised through our grievance mechanism, and engagement with stakeholders. In 2024, we defined and started to pilot updates to our assessment methodology, using, for example, new sources of risk data. We will continue to roll out these changes throughout 2025.

Lindt & Sprüngli is a chocolate manufacturer with production operations in Europe and in North America, distribution operations around the world, and global sourcing. Accordingly, severity and prevalence of our salient issues tend to be greater in our indirect (tier 2+) supply chain, in the sourcing and processing of goods and services, such as raw materials. The risk of child labor is particularly high in West African countries.

There are human rights issues that are particularly relevant to our business, industry, and supply chains.

Among the broader human rights issues identified, we prioritize the following:

- Access to water and sanitation
- Biosphere loss/deforestation
- Child labor
- Climate change
- Discrimination, harassment, and violence
- Forced labor
- Health and safety
- Land rights
- Living income and wages
- Working hours



Risks of modern slavery practices continued

**Operations**

Based on the previously mentioned risk assessment, modern slavery was not identified as a significant risk in Lindt & Sprüngli's global operations, and we consider the risk of modern slavery for the entities' directly employed workers to be low. However, during peak seasonal demands in production and packing, Lindt Australia, Lindt Canada, and Lindt UK supplement their regular workforce with contract workers. These workers are hired through labor hire agreements with local labor agencies, which can potentially increase the risk of modern slavery. Lindt Australia, Lindt Canada, and Lindt UK manage this risk by using well established and known labor hire agencies. These agencies have undergone a pre-qualification process, which includes agreeing to our [Supplier Code of Conduct](#) and Modern Slavery Supplier Questionnaire in Australia. They have also contractually agreed to pay workers a rate stipulated by the Fair Work Commission in Australia, comply with applicable Canadian employment and labor laws including without limitation, occupational health and safety, and human rights legislation, and in the UK, pay above the national minimum wage. Additionally, Lindt Australia conducts random audits of pay rates to ensure compliance and Lindt UK conducts such audits annually.

Lindt & Sprüngli also assesses the risk of child labor, including the exposure of young workers to hazardous work, in its own operations as part of the due diligence process (for further details, refer to the Respecting human rights section of our [Sustainability Report 2024](#)). It was not identified as a significant risk in our own operations.

Supply Chain

At Lindt & Sprüngli, external sourcing is generally divided into direct and indirect procurement categories. The direct categories consist mainly of cocoa products, other raw materials (such as hazelnuts, palm oil, vanilla, etc.), and packaging materials, with thousands of supply chain partners globally. The indirect categories consist of services such as logistics and supply chain, marketing and sales, professional services and consultants, production consumables and support services (including cleaning services, pest control, waste management, and contract labor).

Supply chain service areas, such as logistics, are considered to present a risk of forced or compulsory labor. Additionally, we have identified a risk in the indirect (tier 2+) supply chain in relation to some raw materials (including cocoa, vegetable fats and oils, sugar, and hazelnuts), as well as packaging (for example in factories in Asia). The highest risk of child labor is in the indirect (tier 2+) supply chain of raw materials. This include Guinea, and Madagascar, coconuts and coconut oil, for example, from the Philippines, hazelnuts from Türkiye, palm oil from Indonesia, vanilla from Madagascar, as well as packaging from Asia.

The other main risks of modern slavery for Lindt Australia, Lindt Canada, and Lindt UK are in the sourcing of packaging materials, and engaging of transport contractors, contract warehouse and logistics, and supplementary contract labor.

Actions taken to assess and address modern slavery risks

The following key actions were taken, continued, or planned in 2024:

- Ongoing integration on how we address salient human rights issues in our policies, targets, trainings, and capacity building
- Update of our saliency assessment and incorporation of necessary changes into our risk assessment, policy, action plans, and Double Materiality Assessment (“DMA”) in 2025
- Membership of the Consumer Goods Forum’s Human Rights Coalition
- Monitoring, remediation, and preventive interventions as part of our Child Labor Monitoring and Remediation System (“CLMRS”) guidance
- Initiation of a systematic CLMRS review by the International Cocoa Initiative (“ICI”)

How we care

Upholding business ethics and integrity and respecting human rights is fundamental to how Lindt & Sprüngli operates. We focus on the interests of our own employees, workers within our supply chain, and other persons who may be impacted by our business activities or those of our supply chain. We foster a strong corporate culture characterized by honesty, respect, and integrity. This is reflected in a range of Group policies that define the way we do business. We have a comprehensive system in place for anyone working for, or engaging with, us to voice concerns related to business ethics, integrity and human rights.

Our related policies and documents

In addition to a number of internal policies such as our internal Group Compliance Policy and policies covering topics such as data privacy, competition law, and anti-bribery and corruption, the following Lindt & Sprüngli policies are publicly accessible:

- [Business Code of Conduct](#)
- [Human Rights Policy](#)
- [Supplier Code of Conduct](#)
- [Child Labor Monitoring and Remediation System \(CLMRS\) Guidance Document for Suppliers](#)
- [Speak Up Policy](#)

The Lindt & Sprüngli Business Code of Conduct affirms our standards for non-discrimination and ethical behavior for all employees. It also makes reference to our commitment to respect human rights and to our Speak Up Line, which is an important channel for addressing any Business Code of Conduct violations or concerns. Our Human Rights Policy articulates Lindt & Sprüngli’s commitment to respecting human rights. The Lindt & Sprüngli Supplier Code of Conduct requires our priority suppliers throughout the supply chain to adhere to our social, environmental, ethical, legal, and integrity standards.

The Code is informed by internationally recognized principles such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the International Labour Organization’s fundamental conventions. It sets out what we expect of priority suppliers with regard to compliance with laws and regulations, anti-corruption and bribery, social and working conditions, and protection of the environment. The Child Labor Monitoring and Remediation System (CLMRS) Guidance Document for Suppliers, is tailored to our cocoa supply chain and describes more specifically our expectations of, and proposed approach to, the prevention, monitoring, and remediation of child labor as part of our responsible cocoa sourcing program, the Lindt & Sprüngli Farming Program. Global policies are reviewed on an ongoing basis, updated where required, and subject to continuous improvement.

Actions taken continued

Respecting human rights

Lindt & Sprüngli is committed to respecting human rights, as set forth in our Human Rights Policy. Our human rights commitment is guided by international conventions and standards, consisting of the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, core International Labor Standards, the OECD Guidelines for Multinational Enterprises, and the UN Global Compact (UNGC).

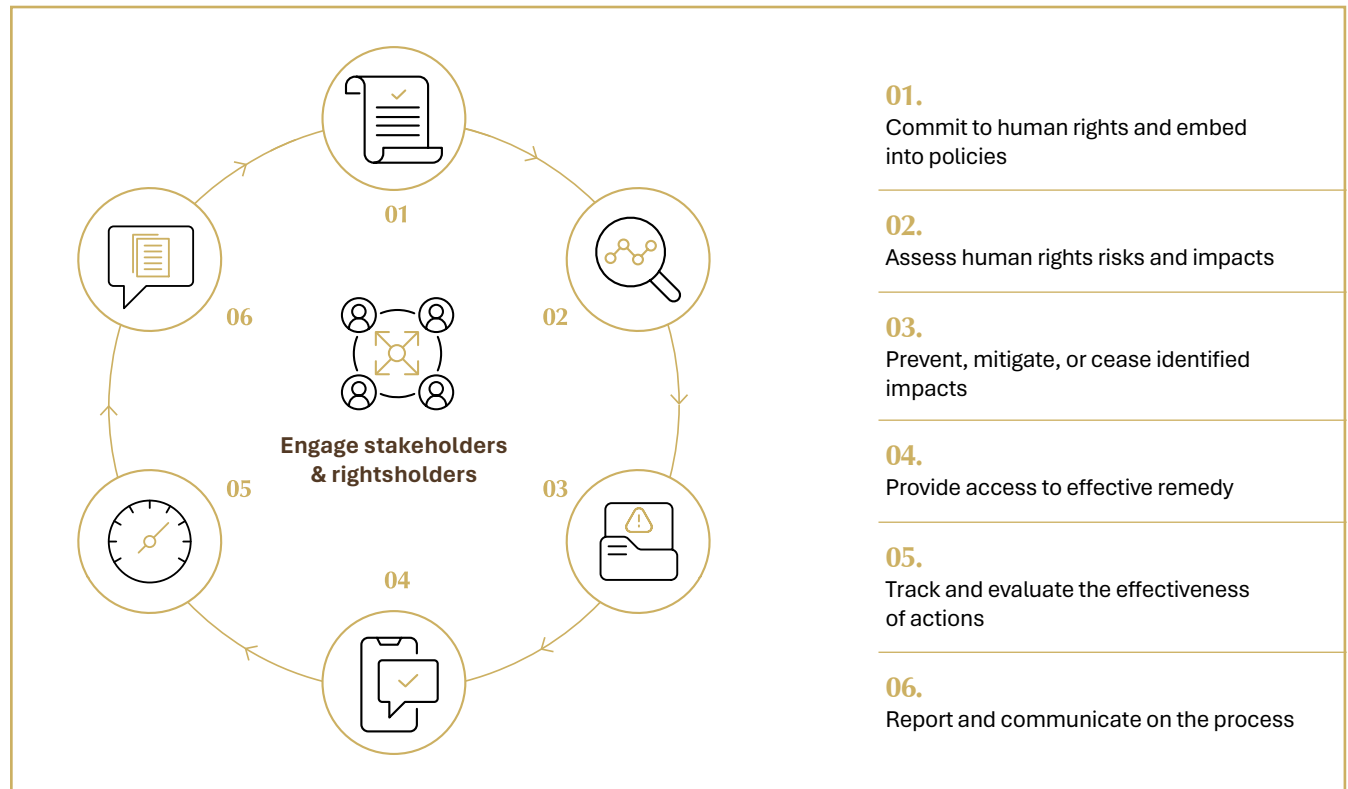
The aim of our human rights due diligence process is to identify, prevent, mitigate, or cease adverse human rights and environmental impacts throughout the organization and our supply chain. It consists of six areas (see graphic on the right). Engagement with relevant stakeholders and rightsholders is a key component of the process.

Through our due diligence process, we work on addressing our salient human rights topics, including consideration of those specifically addressed by the UNGC, the Global Reporting Initiative (GRI), and relevant regulations.

The Lindt & Sprüngli Human Rights Policy applies to our global operations, including our subsidiaries, and to our suppliers but excludes our downstream value chain. It outlines our salient human rights issues, how our actions to respect human rights and our salient issues are integrated into our business, our remedy and grievance mechanisms, and governance. The Lindt & Sprüngli Human Rights Policy is available to all workers and external stakeholders on our corporate website, with translations into six languages.

Lindt & Sprüngli's actions to respect human rights and address our salient issues are integrated into our business on an ongoing basis, including through:

- Policies
- Targets and action plans
- Audits and corrective actions
- Training and capacity building
- Responsible sourcing approach
- Collective action and multi-stakeholder initiative



Actions taken continued

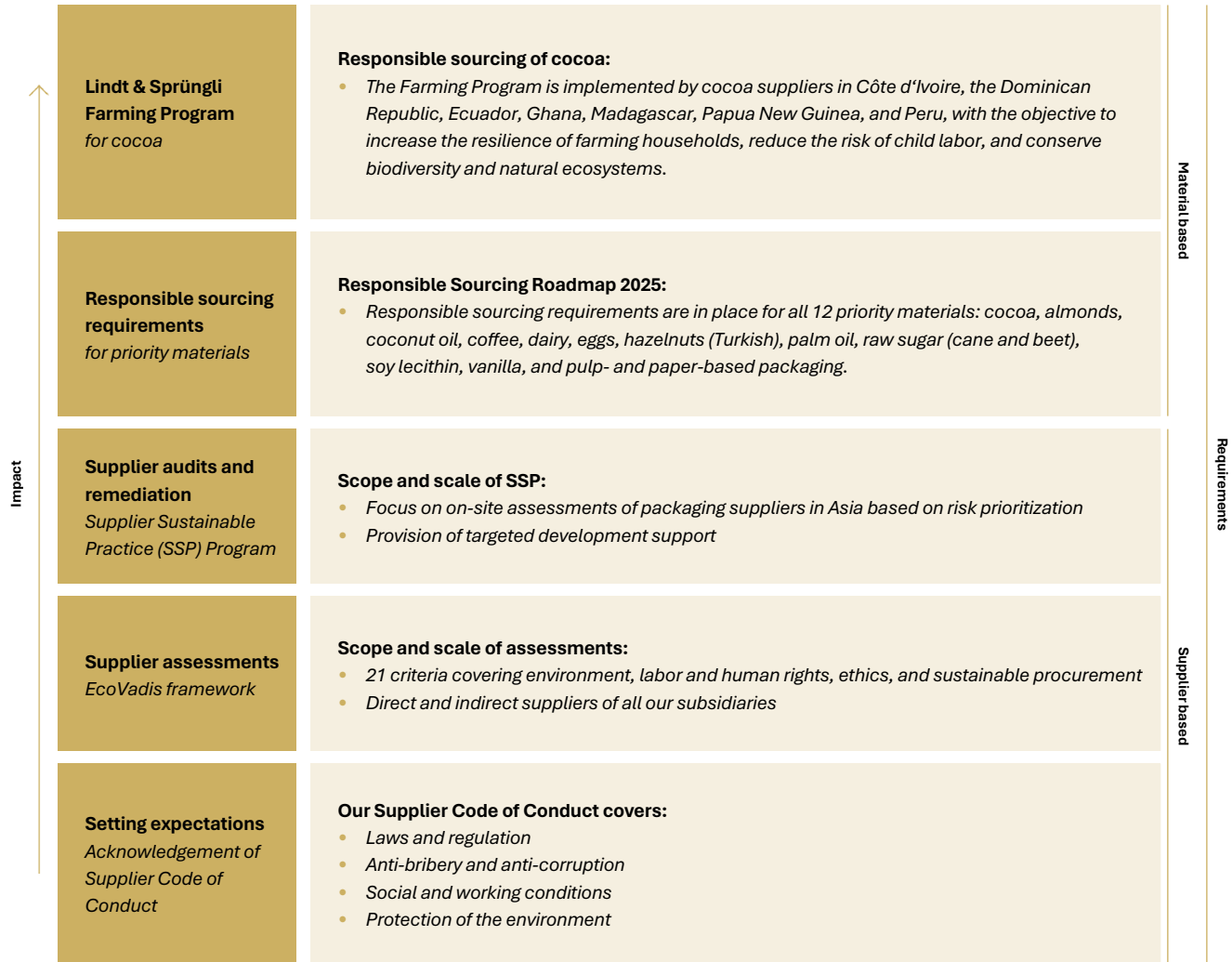
Responsible sourcing

Lindt & Sprüngli recognizes that the production and sourcing of its raw materials can have social or environmental impacts. Negative social impacts can encompass human rights violations, low incomes for farmers, gender inequality, and poor labor conditions, including instances of child labor. These issues are particularly prevalent in the cocoa, hazelnut, coconut oil, and sugar cane supply chains, but also affect the production of vanilla and palm oil. For more detailed information on the impacts of each material, refer to the Responsible sourcing chapter of our [Sustainability Report 2024](#).

Our responsible sourcing approach (see graphic on the right) considers social, economic, and environmental aspects, and applies to our procurement of materials and services. The approach demonstrates the steps we take to help minimize potential negative social or environmental impacts.

We set out our expectations in our Supplier Code of Conduct, which must be acknowledged and signed by our priority suppliers at the start of our collaboration. As a chocolate production company, we prioritize the responsible sourcing of our raw and packaging materials. Our 12 priority materials are: cocoa, almonds, coconut oil, coffee, dairy, eggs, hazelnuts (Turkish), palm oil, raw sugar (cane and beet), soy lecithin, vanilla, and pulp-and paper-based packaging. The Supplier Code includes a commitment to respect human rights and requires adherence to the standards set out in our Human Rights Policy throughout our supply chain. The Supplier Code also incorporates our Speak Up Line, which encourages suppliers, their subcontractors, and their employees to confidentially report any concerns they may have about suspected misconduct at our sites or violations of the Supplier Code, without fear of retaliation.

Our responsible sourcing approach consists of the following five building blocks:



Actions taken continued

Supplier Assessments

We use the EcoVadis framework to evaluate the sustainability performance of prioritized suppliers of direct and indirect goods and services of all our subsidiaries. In 2024, we expanded the scale of our assessment from 629 to 775 scored suppliers, which represents 57.7% of our total procurement expenditure across our Group. Based on expenditure, Lindt & Sprüngli prioritizes suppliers that have not yet undergone the assessment process. Our focus is then on ensuring that suppliers with expiring scores run the assessment again to renew their score. The assessment is based on 21 criteria and covers four topics: environment, labor and human rights, ethics, and sustainable procurement. The EcoVadis framework takes into account material industry issues, presence in risk countries, and the size and geographical span of the supplier. Furthermore, the assessment considers international sustainability standards such as the Ten Principles of the United Nations Global Compact, the ILO conventions, the Global Reporting Initiative (GRI) Standards, the ISO 26000 standard, the Ceres Roadmap, and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

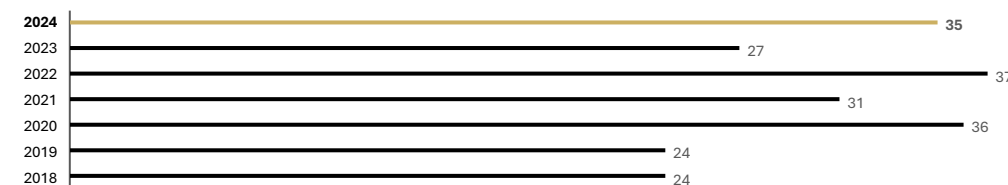
In 2024, our suppliers achieved an average score of 60.9 out of 100, an increase of 4.9 points compared to 2023. Expenditure weighted, the average score was 63.0. Every participating supplier, regardless of their score, receives an individual corrective action plan which outlines expectations on each criterion as well as training support via the EcoVadis Academy.

Supplier audits and remediation

We closely monitor and strive to improve responsible practices at supplier sites through our Supplier Sustainable Practice (SSP) Program, our supplier site audits, and remediation program. Based on prioritization derived from a risk assessment, the program focuses on packaging suppliers in Asia, with an emphasis on social and environmental aspects at production sites. Currently around 10% of our packaging expenditure is linked to suppliers from Asia, especially for decorative materials, as well as for supplies for our Asian subsidiaries. Depending on their risk profile, particularly on the nature of their business operations, we conduct on-site assessments of suppliers that present a significant risk. For new tier 1 and 2 contractors (sub-suppliers that do not have a direct business relationship with Lindt & Sprüngli), we conduct quick-check assessments which focus on compliance. Should suppliers have a low rating in their SSP audits, we require them to be audited on a more frequent basis and to show improvements. Where feasible and reasonable, we reduce the volume we purchase from those with low ratings or replace them if necessary. Suppliers in the SSP Program that violate zero-tolerance issues, or repeatedly fail to improve, are added to Lindt & Sprüngli's Group-wide block list.

Supplier Sustainable Practice Program**The four steps of the Lindt & Sprüngli SSP Program****01***Require suppliers to sign the Supplier Code***02***Conduct an on-site assessment***03***Develop corrective action plans***04***Provide supplier support if necessary***Number of on-site assessments in Asia**

35



In 2024, 35 suppliers were assessed and 17 received a positive overall rating. For the remaining suppliers, we agreed on detailed action plans. These are reviewed frequently, both on and off-site. As a result of our continuous effort to deploy our on-site audit program, most of our packaging suppliers in Asia have undergone assessment over the years. A total of 97.6% of our procurement expenditure for packaging material from Asian factories is covered by the SSP Program.



Actions taken continued

Responsible sourcing of priority materials

Our Responsible Sourcing Roadmap covers the 12 priority materials we want to source, or start sourcing, responsibly by 2025, including those identified as having an elevated risk of modern slavery. The materials were defined based on a comprehensive raw and packaging materials risk assessment. This took into account environmental and social criteria, supply chain risks and impacts, as well as sourced volumes and stakeholder expectations. It considered the unique risks and impacts of individual raw materials as well as the varying risk levels according to geographical origin. Responsible sourcing requirements are in place for all of our 12 priority materials and many have made significant progress since the launch of the requirements, such as 100% of palm oil sourced being Roundtable on Sustainable Palm Oil (RSPO) certified and 100% of our cocoa beans being obtained through the Lindt & Sprüngli Farming Program or other responsible sourcing programs. The risk of child and forced labor in the packaging supply chain is primarily associated with factories in Asia. Through our SSP Program, we audit supplier sites with an emphasis on social and environmental aspects, including child and forced labor, as described above. For additional comprehensive information on the actions taken regarding our prioritized raw materials, please refer to the Responsible sourcing of priority materials section of our [Sustainability Report 2024](#).

Reducing the risk of child labor in the cocoa supply chain

Child labor remains a critical issue in the cocoa sector. Child labor is a complex issue driven by a multitude of factors, including farming households' poverty, lack of awareness and access to education, and the high labor costs of cocoa production. The issue cannot be solved by a single supply chain actor alone. The most common type of child labor in cocoa is hazardous work, including the use of sharp tools, the carrying of heavy loads, and exposure to agrochemicals.¹ Due to the complexity and systemic nature of the issue, identifying the most effective solutions to reduce the prevalence of child labor remains a challenge. Child Labor Monitoring and Remediation Systems (CLMRS) aim to address child labor and are being implemented by various sector stakeholders. This has helped companies to have a clearer view of child labor risks in their

supply chains. Beyond the monitoring of children in the supply chain, a CLMRS includes remediation support to children identified as involved in, or at risk of, child labor, as well as to their families. As monitoring and support for individual children alone does not address the root causes of child labor on a broader scale, we are additionally implementing preventive interventions as part of our CLMRS Guidance Document for suppliers. We are aware that we do not have all the answers on how to prevent abuses of children's rights in our supply chains.

We are, however, engaged in working to continuously enhance the effectiveness of our systems in order to address this risk in our cocoa supply chain and beyond.

Our approach to reducing the risk of child labor in the cocoa supply chain

Lindt & Sprüngli employs a tailored strategy to mitigate child labor risks, which depends on how the cocoa is sourced. For cocoa sourced through the Lindt & Sprüngli Farming Program, measures are implemented as part of the program through suppliers. For volumes not sourced through the Farming Program, we rely on the requirements of, and verification through, Rainforest Alliance Certification (see Responsible sourcing chapter of our [Sustainability Report 2024](#) for more information). This includes volumes sourced through the Mass Balance system (see Traceability models in the Glossary of our [Sustainability Report 2024](#)). Lindt & Sprüngli's cocoa suppliers implementing the Farming Program in countries of origin with a risk of child labor are required to protect children's rights along the cocoa supply chain by implementing our Child Labor Monitoring and Remediation System (CLMRS) guidance. The CLMRS Guidance Document is an integral part of our contracts with the respective suppliers and describes more specifically our expectations of, and proposed approach to, the prevention, monitoring, and remediation of child labor.

Our CLMRS guidance follows three principles:

1. **Dual approach:** This approach to protecting children's rights combines supply chain-based interventions – focused on child labor monitoring and remediation for Farming Program farmers in our supply chain – with community-based interventions to address the issue more broadly.
2. **Children's rights focus:** This places the focus on raising awareness within communities about children's rights, including the issue of child labor as well as related topics such as the right to education.
3. **Preventive interventions:** A focus on multi-dimensional, preventive interventions extends beyond the monitoring and remediation support given to individual children. Mitigating the risk of child labor requires taking preventive measures, including the involvement of community leaders and members, as well as close collaboration with relevant stakeholders, including public institutions.

1. NORC at the University of Chicago, Oct. 2020, "[Assessing Progress in Reducing Child Labor in Cocoa Production in Cocoa Growing Areas of Côte d'Ivoire and Ghana](#)".

Actions taken continued

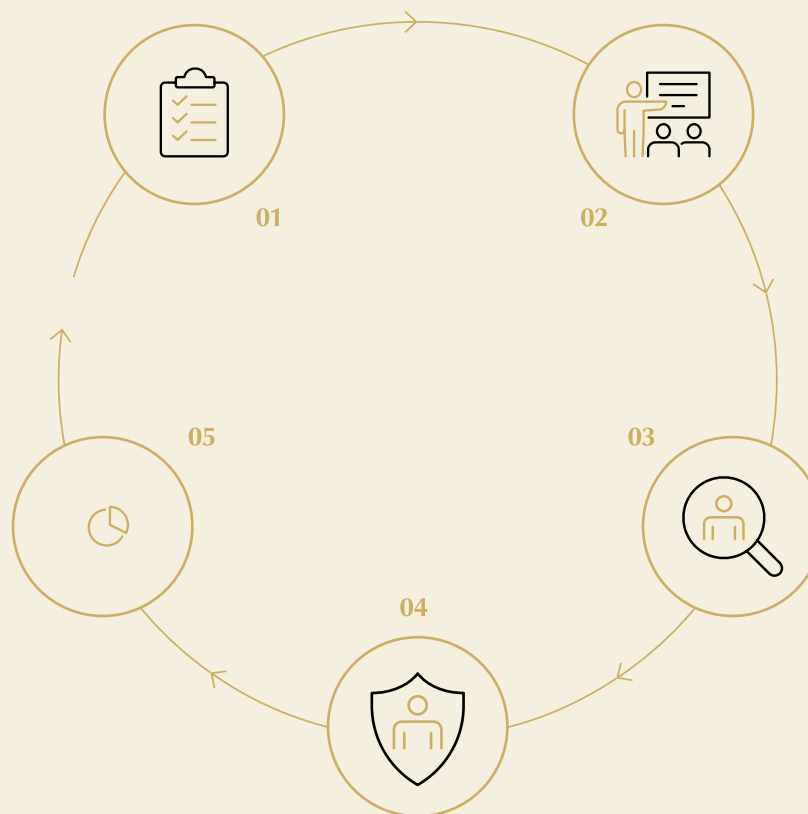
Actions and progress in addressing child labor in the cocoa supply chain

Since child labor is a complex issue which cannot be tackled by individual organizations alone and requires ongoing efforts to improve and further develop sector responses, we joined the International Cocoa Initiative (ICI) in April 2024. As board member and participant in technical discussions, we aim to support effective multi-stakeholder collaboration to advance sector solutions. We are also engaging in collective action at origin to strengthen access to quality education, such as the Child Learning and Education Facility (CLEF) coalition in Côte d'Ivoire. Since the introduction of our CLMRS Guidance Document in 2022, we have been working with suppliers to understand how they implement our requirements related to risk assessments, monitoring, data collection, and remediation support. As part of our ongoing supplier engagement, we check adherence to processes outlined in our Guidance Document and reported data through on-site visits, document reviews, and data validation exercises. If our expectations are not met, we follow up. To get a better understanding of suppliers' practices, and identify improvement actions for the coming years, an assessment of the supplier-implemented CLMRS performed by ICI was initiated in 2024.

1. Assess farming household and community risks

As per our CLMRS Guidance Document, household and community risk assessments are the starting point of the CLMRS process. Suppliers are required to collect and analyze community and household data to identify communities and households with high child labor risks. Some of the key risks are the lack of school infrastructure, lack of access to safe drinking water and health facilities, as well as household-specific risk factors such as number of children or farm size. Our CLMRS Guidance Document outlines that our suppliers should use this data to inform future monitoring visits and investments in preventive actions at the supply chain and community level, which are implemented as part of the Farming Program. In 2024, we continued to support seven suppliers in Ghana and Côte d'Ivoire with implementing our CLMRS process, and three suppliers in Papua New Guinea and Madagascar in the rolling-out of the process.

Child labor monitoring and remediation process



01. Assess farming household and community risks

02. Implement preventive interventions

03. Monitor farming households

04. Provide remediation to children identified in child labor

05. Report data and progress

Actions taken continued

2. Assess farming household and community risks

As initial preventive measure in the supply chain, Lindt & Sprüngli expects its suppliers to raise awareness of the protection of children's rights as part of the mandatory training curriculum, which is a minimum requirement of the Lindt & Sprüngli Farming Program. In addition to farmer training, staff from our suppliers conduct visits to selected high-risk Farming Program households to raise awareness at individual level. Since child labor is a systemic issue, it cannot be solved on a broader scale solely by engaging individual households and supporting individual children in the supply chain. For this reason, we expect our suppliers to use the collected CLMRS risk data to decide on and target more systemic and preventive community-based interventions. Therefore, at-risk communities are supported by investments in community infrastructure, such as education and water infrastructure. With the Farming Program we also aim to address child labor risks by increasing the resilience of farming households. This includes initiatives aiming at facilitating higher productivity, supporting diversification of household incomes, and improving access to adult labor through community service groups. In the reporting year, the Farming Program supported the construction or refurbishment of 18 schools, bringing the total to 75 schools, benefiting approximately 14,200 children to date. In 2024, we also provided financial support for the creation of new Community Child Protection Committees (CCPCs), which work to sensitize communities on the issue of child labor and serve as an additional mechanism to address child labor beyond the supply chain.

Our recognition of the need for collective action to prevent child labor at a more systemic level was instrumental in our decision to join the Child Learning and Education Facility (CLEF) coalition in 2022.

3. Monitor farming households

We guide suppliers to implement a risk-based approach to identifying child labor within the cocoa supply chain. Firstly, suppliers in child labor risk countries are expected to identify children at risk during announced farm monitoring visits to all Farming Program farmers. Secondly, suppliers are expected to conduct unannounced child labor monitoring visits to homes or farms of Farming Program households identified to be at risk during the risk assessment. Finally, suppliers, as well as Lindt & Sprüngli, have grievance mechanisms in place through which child labor can be reported by any stakeholder (see Provide access to effective remedy in the Respecting human rights chapter of our [Sustainability Report 2024](#)). To support child labor monitoring at community level, the Farming Program provides indirect support by helping to establish CCPCs and to support them in putting in place a monitoring and grievance mechanism, including data sharing with regional government institutions.

4. Provide remediation to children identified in child labor

Suppliers are required to operate a case management system to manage identified child labor. Such a system aims to provide remediation support for concerned families of impacted children. It is combined with follow-up visits to assess the success of the remediation support. Remediation support at an individual level can include engagement with parents, the provision of school uniforms, birth certificates, or funds for school fees, and referral to local authorities. In 2024, suppliers reported that more than 540 children within the Farming Program were no longer performing work classified as child labor during the two most recent follow-up visits conducted by program staff. Child labor identified outside of the Farming Program at community level is remediated through awareness-raising visits by the CCPC where available or referral to government institutions.

5. Report data and progress

Suppliers are required to document their processes, collect and analyze data, record activities conducted, and report on both activities and remediation on an annual basis to Lindt & Sprüngli, as well as to ICI in the case of Ghana and Côte d'Ivoire.

Refining our approach in our cocoa supply chain

Over the next years, we plan to strengthen our efforts to address child labor and continue our work on supporting household resilience and community development through the Farming Program. We will conclude our CLMRS review, performed by the ICI, and define improvement actions. Our strengthened strategic approach will also include an action plan to address forced labor risks in the cocoa supply chain.

Metrics and targets

By 2025, we aim for 100% of our cocoa volume from child labor risk countries to be covered by a Child Labor Monitoring and Remediation System (CLMRS) or other due diligence system that is being rolled out or is implemented, with Mass Balance included.

In Ghana and Côte d'Ivoire, 89,500 farming households, all of them participants of the Lindt & Sprüngli Farming Program, were covered by a CLMRS. Suppliers in Papua New Guinea and Madagascar were onboarded to our CLMRS in 2023 and are currently rolling this out to cover 7,000 households.

Actions taken continued

Collective action and multi-stakeholder initiatives

Since human rights issues are complex and cannot be tackled by individual organizations alone, requiring ongoing efforts to improve and further develop sector responses, we joined the International Cocoa Initiative (ICI) in April 2024. As board member and participant in technical discussions, we aim to support effective multi-stakeholder collaboration to advance sector solutions. We are also engaging in collective action at origin to strengthen access to quality education, such as the Child Learning and Education Facility (CLEF) coalition in Côte d'Ivoire. Over the coming year, we plan to pursue our efforts to establish new and strengthen existing partnerships and continue our active participation in multi-stakeholder initiatives. This underlines our recognition of the increasing importance of mutual learning and the exchange of best practices, sector alignment, and innovation. In 2024 Lindt & Sprüngli also became a member of the Consumer Goods Forum's Human Rights Coalition, with the goal of contributing to collective action on human rights. For more information on our partnerships, see our [Memberships & Partnerships page](#).



Remediation measures

Provide access to effective remedy

Our Speak Up Line grievance mechanism and remediation process are our primary means of providing access to remedy (see Speak Up Line in the Upholding business ethics and integrity chapter of our [Sustainability Report 2024](#)).

Our Speak Up Line is open to individuals, community representatives, and organizations, including potentially or currently affected stakeholders. It allows employees and third parties to report an incident anonymously by calling a toll-free number or submitting a written report online. For further information see the [Speak Up About Your Concern](#) section on our website. In addition to the Speak Up Line, other processes and channels exist to audit or otherwise identify and remediate matters of concern, such as Child Labor Monitoring and Remediation Systems (CLMRS), and the Supplier Sustainable Practice (SSP) Program. As described above (see [Provide remediation to children identified in child labor](#)), as part of the CLMRS, implemented by cocoa suppliers through the Lindt & Sprüngli Farming Program, suppliers are required to operate a case management system to manage identified child labor. Such a system aims to provide remediation support for concerned families of impacted children. It is combined with follow-up visits to assess the success of the remediation support.

Increasing the resilience of farming households

The Lindt & Sprüngli Farming Program aims to contribute to building resilient livelihoods for farmers, their families, and farming communities by taking a holistic approach to increasing farming household incomes. We are addressing this through a combination of preventive measures, with the aim of improving the income situation overall, recognizing that poverty among cocoa households is one of the underlying root causes of the cocoa sector's sustainability challenges. In the area of farmer livelihoods, we are planning the introduction of a living income project, integrating 5,000 cocoa farming families between 2025 and 2027. As we gain a better understanding of what approaches and interventions are effective across different supply chains, we aim to scale best practices across the program.



Training and capacity building

We communicate our Human Rights Policy to new and existing employees through a reference in Lindt & Sprüngli's Business Code of Conduct. With effect from 2024, employees who have a relevant role in the human rights due diligence process are required to annually undergo a mandatory human rights introduction, in form of an online video. This introduces the UN Guiding Principles (UNGPs), our commitment and due diligence process, and key topics such as child labor and forced labor.

For direct suppliers, EcoVadis-assessed suppliers receive access to human rights training materials and resources to support them in meeting human rights commitments. These resources include guidance on developing labor and human rights policies, reports, whistleblower procedures, and information on employee health and safety, child and forced labor prevention, and diversity and inclusion. Through the Lindt & Sprüngli Farming Program, we pursue long-term supplier partnerships, co-designing and developing the program with suppliers.

This allows us to establish clear expectations regarding human rights issues and work closely with suppliers to review their performance and facilitate continuous improvement. It also supports capacity building for farmers over multiple years. For indirect (tier 2+) suppliers, our SSP approach encourages long-term improvements in human rights issues for packaging suppliers in Asia, providing targeted development support, such as dedicated advice on worker safety management systems. For affected communities, through the Lindt & Sprüngli Farming Program for cocoa, implemented by our suppliers, we go deeper into our supply chain by offering training and support for farmers and community members on salient issues like child labor sensitization and health and safety. We also provide premiums, invest in infrastructure, and establish Village Savings and Loan Associations (see the Rural development chapter of our [Sustainability Report 2024](#) for further information).





Effectiveness of actions being taken to assess and address modern slavery risks

Evaluating the effectiveness of our Human Rights Policy

Lindt & Sprüngli's Human Rights Policy was approved in 2022 by the CEO, Group Management, and the Board of Directors, and we annually assess its effectiveness.

The 2024 review considered the Human Rights Policy, identification and assessment of impacts, prevention and mitigation actions, tracking, reporting, and access to remedy. Our evaluation was prepared by the Human Rights Officer and reviewed by members of Group Management as well as by the Sustainability Committee of the Board. In 2025, we will be updating our methodology to review the effectiveness of our due diligence process. This aims to ensure continuous improvement and enhance the robustness of the methodology.

Assessments to measure the impact of the Farming Program

In 2019 and 2023, we conducted an impact assessment of the Farming Program in Ghana, which included a review of the topic of farmer income, with the KIT Royal Tropical Institute. In 2024, several internal workshops took place to discuss results and implications of the impact assessment for future Farming Program design. Over the coming years, we aim to further strengthen our project planning, monitoring, and evaluation approach with a focus on enhanced data collection and analysis to better assess the effectiveness of the Farming Program activities.

Actions and progress in addressing child labor in our cocoa supply chain

Since the introduction of our CLMRS Guidance Document in 2022, we have been working with suppliers to understand how they implement our requirements related to risk assessments, monitoring, data collection, and remediation support. As part of our ongoing supplier engagement, we check adherence to processes outlined in our Guidance Document and reported data through on-site visits, document reviews, and data validation exercises. If our expectations are not met, we follow-up. To get a better understanding of suppliers' practices, and identify improvement actions for the coming years, an assessment of the supplier-implemented CLMRS performed by ICI was initiated in 2024.

For additional information on the Lindt & Sprüngli Farming Program monitoring and verification approach please see our [Sustainability Report 2024](#).

Australia-specific actions

Consultation with Australian reporting entities and their owned and controlled entities

Lindt Australia is the reporting entity and sole Australian entity of the holding company Chocoladefabriken Lindt & Sprüngli AG. Lindt Australia does not own or control any further entities.

Provide any other relevant information

Lindt Australia undertakes to continually review and assess how to improve its approach most effectively to human rights including modern slavery in its operations and supply chain (see table below). It will collaborate with its supply chain partners and other businesses to continue raising the awareness of this complex issue. It will continue to review its three-year strategy to ensure it can dive deeper into its supply chains.

Topic	Key result areas
A. People	• Train core supply chain staff and internal stakeholders • Conduct awareness sessions within Lindt Australia
B. Process	• Embed supplier self-assessment questionnaire
C. Policy	• Establish procurement policy with contents to include responsible sourcing and modern slavery guidelines • Establish modern slavery policy in addition to the Group Human Rights Policy
D. Suppliers	• Engage & collaborate with the wider supplier base on Supplier Code of Conduct, supplier assessment via EcoVadis framework and Supplier Sustainable Practice (SSP) program • Engage other external parties



Approvals and attestation

Reporting Year 2024

Australia

This document has been approved by the board of Lindt & Sprüngli (Australia) Pty Ltd on May 23, 2025.



Alain Germiquet

Chairman of the Board of Lindt & Sprüngli (Australia) Pty Ltd.,
signatory power as per association Articles

United Kingdom

This statement was approved pursuant to Section 54 of the UK Modern Slavery Act 2015 by the Board of Directors of Lindt & Sprüngli (UK) Ltd on May 20, 2025.



Alain Germiquet

Chairman of the Board of Lindt & Sprüngli (UK) Ltd.

Canada

“In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I, in my capacity as CEO, attest that I have reviewed the information contained in this report on behalf of the Board of Directors of Lindt Canada. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the 2024 financial reporting year.”

This report has been approved pursuant to Section 11(4)(a) of the Canadian Act by the Board of Directors of Lindt & Sprüngli (Canada) Inc. on May 26, 2025.

I have the authority to bind Lindt & Sprüngli (Canada) Inc.



Andrew Curran

CEO and Member of the Board of Directors

Date: May 26, 2025

Appendix 1

Overview of reporting entities

The following companies qualify as reporting entities for the purposes of the Australian MSA, Canadian Act, and UK MSA.

Law	Reporting entity
Australia's Modern Slavery Act 2018	Lindt & Sprüngli (Australia) Pty Ltd ABN 43 079 224 892 16 Hollinsworth Road Marsden Park NSW 2765 Australia Phone: +61 2 9854 2500
Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act	Lindt & Sprüngli (Canada) Inc. 900-181 University Avenue Toronto, ON, M5H 3M7 Canada Phone: +1-866-374-1914
United Kingdom's Modern Slavery Act 2015 (UK MSA)	Lindt & Sprüngli (UK) Ltd. 4 New Square, Bedford Lakes Feltham Middlesex TW14 8HA United Kingdom Phone: +442086024100

Appendix 2

Reporting criteria

The table below sets out where in this Statement we have addressed the mandatory reporting criteria of the Australian Modern Slavery Act and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, as well as the recommended reporting criteria under the UK Modern Slavery Act.

Australian mandatory criteria	Canada mandatory reporting criteria	UK recommended reporting criteria	Section
The identity of the reporting entity	N/A	N/A	About this statement Appendix 1
The structure, operations and supply chains of the entity	The entity's structure, activities and supply chains	Organization's structure, business and supply chain	Structure and operations, supply chain, governance
The risks of modern slavery practices in the operations and supply chains of the entity and any entities the reporting entity owns or controls	The steps the entity has taken during its previous financial year to prevent and reduce the risk of forced labor or child labor The parts of the entity's business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk	Parts of the organization's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Risks of modern slavery practices in the operations and supply chains of the reporting entities
The actions taken by the entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	The entity's policies and its due diligence processes in relation to forced labor and child labor; any measures taken to remediate any forced labor or child labor	Organization's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains	Actions taken to assess and address modern slavery risks Remediation measures
	The training provided to employees on forced labor and child labor	The training about slavery and human trafficking available to its staff	Training and capacity building
	Any measures taken to remediate any forced labor or child labor; any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains		Remediation Measures

Appendix 2 continued

Australian mandatory criteria	Canada mandatory reporting criteria	UK recommended reporting criteria	Section
How the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	How the entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains	Information about effectiveness of steps taken	Effectiveness of actions being taken to assess and address modern slavery risks
The process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement			Structure and operations, supply chain, governance
Any other relevant information			Australia-specific actions



LINDT & SPRÜNGLI