

NILÖRNGRUPPEN AB

Nilorgruppen Slavery and Human Trafficking Statement

Company profile

Nilorgruppen is a global company with expertise in adding value to brands in the world of labels, packaging and accessories. We offer complete, creative and tailor-made concepts in the areas of branding, design, product development and logistic solutions. Our offices and manufacturing bases are in: Sweden, Denmark, Belgium, Switzerland, USA, Germany, Italy, United Kingdom, Portugal, Turkey, Hong Kong, China, India, Bangladesh and Pakistan. The Group Head Office is located in Borås Sweden and the parent company Nilorgruppen is listed on Stockholm Stock Exchange, First North Premier. Our practices are governed both at a global and local level. Nilorgruppen core values are the practices our employees should be guided by daily, in all work situations. The values are Passion, Respect, Common Sense, Execute, Innovation, Teamwork and Responsibility.

Our responsibility

Nilorgruppen is committed to complying with laws and regulations and acting in accordance with commonly accepted best practices. Among those are regulations on human trafficking and forced labour, including but not limited to California Transparency in the Supply Chains Act of 2010 and the UK Modern Slavery Act 2015. As a globally operating company we recognise our responsibility to respect international standards and practices, such as those of United Nations (UN) Universal Declaration of Human Rights and Fundamental Rights at Work by International Labour Organisation (ILO).

Human Trafficking and Modern Slavery

Supporting or participating in human trafficking and forced labour practices are clearly prohibited by the principles of Nilorgruppen Supplier Code of Conduct. The requirements clearly define steps in the recruitment process to ensure that we do not contribute to human trafficking or modern slavery. The steps include but are not limited to proper verification of identity, prohibiting recruitment fees, and clearly communicating the terms and conditions of employment. Nilorgruppen has zero tolerance to slavery and human trafficking

Suppliers

Nilorgruppen seeks to do business with suppliers who share similar values and respect human rights. We require our suppliers to take actions that are consistent with the Nilorgruppen Supplier Code of Conduct. Suppliers, including labour agencies and recruiters, are required to have processes in place to ensure that they do not take part in human trafficking or modern slavery.

The process to evaluate and address specific risks of human trafficking and slavery on our product supply chain in more detail is currently being developed to have the same procedures in all sourcing countries. Evaluation will be part of the supplier assessment and repeated at regular intervals. While Nilorgruppen uses its contractual right to conduct on-site audits of selected suppliers, those on-site audits do not currently include specific assessment of human trafficking and modern slavery. It is part of the third-party audits that are being performed.

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The Supplier Code of Conduct is a part of the contract with key suppliers, this code is currently being updated. Currently, any business relationship with a supplier that fails to perform according to the requirements stated in Nilornggruppen Code of Conduct would be re-evaluated. The relationship may eventually be terminated if the supplier does not demonstrate sufficient efforts to improve.

Training

The management team is responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly. All employees receive an induction into the business where our policies, procedures and expectations are outlined. As a responsible business, it is essential for employees to understand why respect for human rights is so important. Training and awareness-raising are therefore central to embedding this approach. Throughout 2017, we are considering how to provide this training to all employees regardless of location, online training is preferable.

Reporting misconducts

Nilornggruppen employees are, under the terms of employment, expected to follow all applicable laws and all Nilornggruppen policies, including the Nilornggruppen Code of Ethics and Business Conduct. Employees who violate the Code or any employment policies are subject to disciplinary action, up to and including dismissal. Employees are encouraged to report all violations of the Code or other employment policies to their managers, an officer of the company or to the Human Resources department. The registration can be done personally by phone, e-mail or an anonymous letter.

Our effectiveness in combating slavery and human trafficking

Nilornggruppen uses the following key performance indicators 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:

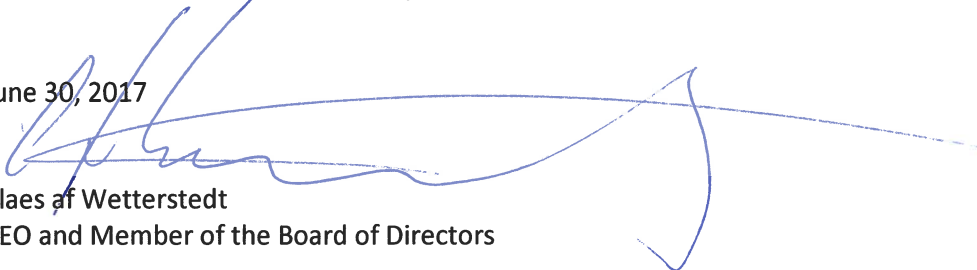
- Supplier monitoring program including prohibition of the use of undeclared units.
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.

Going forward

We will continue to address the risks and develop our work to prevent modern slavery and human trafficking across the supply chain. We will report on Nilornggruppen's progress in next year's statement.

This statement covers the financial year 2016 and has been approved by the Board of Directors.

June 30, 2017


Claes af Wetterstedt
CEO and Member of the Board of Directors

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