

# Nilörngruppen AB – Modern Slavery and Human Trafficking Statement 2025

## Introduction

Nilörngruppen AB is committed to upholding human rights and preventing all forms of modern slavery and human trafficking within our operations and supply chains. This statement is made pursuant to the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act, and the German Supply Chain Act. It outlines the steps taken during the financial year ending December 31, 2024.

## Our business and structure

Nilörngruppen AB is a global provider of branding, labelling, and product identification solutions. Headquartered in Borås, Sweden, we operate in over 17 countries and employ approximately 650 people worldwide. Our services include design, product development, logistics, and digital solutions through our Retail Information System (RIS). We are listed on Nasdaq OMX Nordic Small Cap.

## Our commitment

Nilörn maintains a zero-tolerance approach to modern slavery. We are a signatory to the UN Global Compact and align our operations with its ten principles, including those related to human rights and labour. Our [Human Rights Policy](#) and [Supplier Code of Conduct](#) reflect our commitment to ethical business practices and the protection of human dignity.

## Policies and governance

Our [key policies](#) include:

- Supplier Code of Conduct – Based on the ETI Base Code and ILO conventions, it prohibits forced labour, child labour, and human trafficking.
- Human Rights Policy – Outlines our responsibility to respect and promote human rights
- Whistleblowing Policy – Provides a secure channel for reporting concerns, accessible to employees and external stakeholders.
- Anti-Corruption Policy – Our responsibility to conduct business in an honest and ethical manner.

These policies are reviewed annually and communicated to all employees and suppliers.

## Risk assessment and Due Diligence

We do not tolerate child labour, forced or bonded labour, inhumane treatment, serious health and safety risks, or unethical practices such as bribery or misrepresentation. Breaches may lead to immediate termination of the business relationship. We conduct risk assessments to identify areas of potential vulnerability to modern slavery. Our due diligence process includes:

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**Local office and production**  
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Belgium  
China  
Denmark  
Germany  
Hong Kong  
India  
Italy  
Japan  
Pakistan  
Portugal  
Spain  
Sweden  
Switzerland  
Netherlands  
Turkey  
United Kingdom  
USA  
Vietnam

- Screening and onboarding of new suppliers
- Regular supplier evaluations and third-party audits
- Contractual obligations for key suppliers to comply with our Code of Conduct

In 2024, we terminated four supplier relationships due to non-compliance with our standards.

Nilörn offers a [whistleblowing function](#) for reporting serious concerns. It is accessible to employees, suppliers and other stakeholders, with information available via meetings, intranet, and website. Reports are reviewed by the CFO, CEO, and two independent board members, and the Board of Directors receives the final report. One incident was reported in 2024.

## Training and awareness

All employees receive induction training covering our ethical standards, including modern slavery awareness. Management teams responsible for supplier relationships receive targeted training to identify and mitigate risks. In 2024 we also initiated a ESG supplier training.

## Monitoring and effectiveness

We use the following KPIs to measure the effectiveness of our anti-slavery efforts:

- Supplier monitoring and audit outcomes
- Number of reported incidents
- Training completion rates
- Policy reviews and updates

Our Human Rights Due Diligence Procedure (HRDDP) supports continuous improvement and accountability across our operations.

Nilörn's annual [Sustainability Report](#) serves as a means of communication regarding these efforts.

## Looking ahead

In 2025, we will continue to strengthen our due diligence processes and prepare for compliance with the Corporate Sustainability Reporting Directive (CSRD). We aim to enhance transparency and collaboration with suppliers to ensure ethical practices throughout our value chain.

## Approval

This statement has been approved by the Board of Directors of Nilörngruppen AB and applies to all companies within the Group.



Krister Magnusson  
CEO, Nilörngruppen AB  
Date: 30 May, 2025