



Child and Forced Labour Report

May 1, 2025



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Executive Summary

At HelloFresh, our mission is to change the way people eat forever.

As our customer base, geographic coverage and product offering expands, so too does our supply chain, adding to the vast number of individuals and organizations that play an important role in delivering fresh and healthy ingredients to millions of households in a safe and convenient way.

We understand that our mission must never come at the cost of the safety, security and fair compensation for the work of anyone involved in our business or supply chain. We recognize the importance of understanding our business and supply chain to effectively detect, assess, and address risks related to child and forced labour.

We acknowledge that across a vast supply network that is continually growing, and involves suppliers from a wide variety of industries, the risk of child and forced labour practices occurring within some parts of our supply chain does exist, and we must be diligent and proactive to develop open and transparent relationships with all of our suppliers, in order to minimize this risk to the greatest extent that we can.

This report outlines the actions taken to assess and address child and forced labour risks in our business operations and supply chain for the 2024 financial year.

Introduction

GDE Grocery Delivery E-Services Canada Inc. (“HelloFresh Canada”) is a company incorporated in Canada. Our registered office is located in Toronto, Ontario. HelloFresh Canada forms a part of the HelloFresh group of companies worldwide, and is a wholly-owned subsidiary of its German parent company, HelloFresh SE.

This report given pursuant to Section 11 (3) of the Fighting Against Forced and Child Labour in Supply Chains Act (the “Act”) and covers the activities of HelloFresh Canada for the year January 1st 2024 to December 31st 2024.

This statement has been approved by the Directors of HelloFresh Canada.

HelloFresh Canada strongly supports the objectives of the Act. As part of our mission to embed the values of sustainability, ethical behaviour, strong governance and transparent oversight in all of our business practices, we are committed to addressing and striving to eliminate the risk of child labour and forced labour in our business and throughout our supply chain.

Our Structure, Activities, Operations & Supply Chain

Operating in Canada since 2016, HelloFresh is the leading provider of home-delivered meal kits and pre-cooked meals to consumers nationwide.

In collaboration with our extensive network of suppliers, we source ingredients and packaging materials, and provide customers with pre-portioned ingredients and pre-cooked meals as part of a wide variety of carefully curated recipes for Canadians to enjoy.

As part of our commitment to providing the highest quality product offering for our customers, HelloFresh Canada has made significant investments in establishing

the business processes and operational infrastructure to facilitate our growth and expansion. This includes a workforce of over 1000 employees across Canada, the operation of distribution centres in Edmonton, Abbotsford, Brampton and Mississauga, our head office in Toronto, our last mile delivery hubs, a fully integrated distribution and logistics chain, and a robust technology platform to facilitate our evolving operations.

Operations

Our meal-kit and ready-to-eat operations revolve around the fulfillment and delivery of meal box subscriptions for our customers, entailing a weekly cycle involving the procurement of various bulk, pre-portioned, pre-cooked, and pre-packaged meals and ingredients. Our operations also involve the procurement of packaging, insulation, and ice-pack materials to keep our food fresh throughout the delivery process.

The delivery and storage of inbound materials is coordinated at our distribution centres to facilitate the pick-and-pack and sorting process before our products are distributed to customers through a network of HelloFleet service or delivery providers.

The fast moving nature of our product offering means that we rely on building and maintaining strong and mutually beneficial supplier relationships. This includes streamlined coordination with our suppliers across various stages of the supply chain. Not only does this ensure that our production and distribution process goes smoothly, but it also allows us to prioritize partnerships that closely uphold labour, quality, safety, and sustainability standards, both globally and nationally.

Our business model diverges from the conventional operations of traditional grocery or food retailers and allows us to place heavy reliance on our supplier's ability to adapt flexibly to our operational requirements.

Supply Chain

We work with a vast array of suppliers to facilitate our operations, and these can be broadly categorized into Upstream, Downstream or Indirect Suppliers.

Upstream Suppliers

Upstream Suppliers are those who supply our ready-to-eat and meal-kit businesses with raw materials and pre-production goods for further input, packing, preparation, processing and delivery. These include suppliers of the following categories:

- Meats & Other Proteins
- Fruits & Vegetables
- Bakery Items
- Spices, Sauces and Condiments
- Packaging Materials (i.e. boxes)
- Recipe Cards & Other in-box materials
- Inbound Freight Providers

Downstream Suppliers

Downstream Suppliers are those who provide inputs into our products from when they are received by HelloFresh Canada through to the end-delivery to our customers. Downstream suppliers include, but are not limited to:

- Logistics and Outbound Freight Providers
- Third-Party Labour Providers
- Equipment & Maintenance Providers
- Utility Providers

Indirect Suppliers

Indirect Suppliers are those who do not directly contribute to the fulfillment of our orders, but are necessary to the operation of a certain function of the business, or provide ancillary support to the business. Indirect Suppliers include, but are not limited to:

- Cleaning & Pest Control Providers
- IT Providers
- Various Tech & Software Suppliers
- Insurance Providers
- Consultants, Advisers and Professional Consultants
- Property Development and Leasing Providers
- Suppliers of Marketing Services
- Utility Providers

Policies Relating to Forced Labour and Child Labour

We have implemented policies addressing child and forced labour in our own operations and supply chains. The following section describes these policies.

Ethical Trading Policy

Our Ethical Trading Policy provides clear standards and expectations for our suppliers with respect to human and labour rights, including child and forced labour practices. It also grants our business the ability to monitor, visit and audit suppliers and engage in corrective actions or escalations in necessary circumstances.

The policy is embedded into our supplier onboarding and operating processes. To reinforce compliance, we have incorporated a contractual clause in our Master Services Agreement (“**MSA**”) that legally binds HelloFresh Canada suppliers to abide by our Ethical Trading Policy. These ethical standards are also reflected in HelloFresh Canada’s standard terms with our suppliers.

The overall objective of our Ethical Trading Policy is to ensure that every supplier acknowledges the policy, signs a legally binding agreement, and maintains ongoing compliance. Additionally, our Food Safety and Quality Assurance team and our Procurement team also conduct regular site visits to assess our suppliers in regards to food safety and quality, including ensuring our compliance with the Canadian Food Inspection Agency (“**CFIA**”) regulations. As part of these supplier visits, we ensure our teams are aware of our policy to report any observed ethical breaches.

Our Ethical Trading Policy contractual terms provide us with the ability to:

- Require suppliers to provide HelloFresh Canada with the appropriate documentation and evidence of controls with respect to Ethical Trading Policy conformance;
- Require suppliers to register with the SEDEX (Supplier Ethical Data Exchange) platform, one of the world’s largest data platforms for supply chain assessment and sustainable supply chain solutions, for the purpose of verification, data collection and monitoring;
- Carry out our own inspection at suppliers’ premises or commission a third party to conduct an external audit of the premises or operations of a supplier in order to verify compliance with our Ethical Trading Policy; and
- Require suppliers to participate in relevant training relating to HelloFresh ethical standards.

The Ethical Trading Policy is supplemented by HelloFresh Canada’s existing policy and corporate governance framework, including its global employee Code of Ethics, outlining values and expectations of every HelloFresh employee. This includes the expectations to not only act in a sustainable and ethical way in line with HelloFresh’s values, but to also report instances of non-compliance with the Ethical Trading Policy and Code of Ethics by any HelloFresh Canada employee or supplier.

Code of Ethics

Our [Code of Ethics](#) sets out our ethical standards as well as our expectations towards our employees to uphold our values and act sustainably – for our planet, our people, our community and our business. This code of conduct, which is binding for all employees, clarifies our expectations for respecting human and environmental rights and reinforces that we do not tolerate any form of child labour or forced labour. We expect everyone, at every level of our organization, to take an active part in upholding these ethical standards.

Human Rights Statement

Our [Human Rights Statement](#) outlines our strategy to respect human rights in our operations and supply chains. We take proactive measures to identify risks, minimize them, and take corrective action in case of violations.

Due Diligence Processes

In connection with the HelloFresh Group’s preparation for compliance with the German Supply Chain Due Diligence Act, we have developed a comprehensive Ethical Trading strategy.

Our strategy is informed by international frameworks, including the Universal Declaration of Human Rights and the International Labour Organization’s (ILO) Declaration on the Fundamental Principles and Rights at Work and guidelines and covers the following topics:

HelloFresh Group Ethical Trading Strategy

We have developed an Ethical Trading Strategy building on a five-pillar risk based-approach



This strategy includes measures to promote human and environmental rights, to identify risks to respect human rights at an early stage, to minimize these risks through relevant and appropriate preventive measures, and to take corrective action in the case of violations.

- Our requirements for ourselves and our partners
- Risk Analysis and Risk Management
- Our Prevention Programme
- Our Complaints Procedure
- How we deal with violations of human and environmental rights
- Monitoring & Continuous Development
- Documentation & Reporting

Please see the next section for more detailed information about how we assess and manage risks within our business operations and along our supply chain.

Measures to Assess & Measure Risks of Child and Forced Labour

Own Operations

Risk Assessment – Own Operations

In 2024, we conducted a risk assessment based on inherent country and sector risk data from SEDEX, a leading platform for responsible sourcing. This enabled us to identify potential human rights risks associated with our business activities. The results of this risk assessment are the basis for the development and implementation of preventive measures to address relevant risks.

Risk Prevention & Management – Own Operations

To effectively manage and prevent risks associated with child and forced labour, we have established measures within our workforce, covering both direct hires and agency workers. During onboarding, protocols are implemented for direct hires to verify legal documentation and entitlement to work in Canada. This includes thorough checks on documents such as contracts of employment, driver's licenses, and work permits. Contracts are validated using digital signing platforms like DocuSign, and all necessary documentation is uploaded to our Workday Human Resources Information System. Moreover, direct hires must provide direct deposit information for payroll and attend in-person onboarding sessions for essential training and documentation confirmation.

Our Human Resources recruitment framework ensures compliance with the Provincial Employment Standards. Regular independent reviews and audits are conducted to ensure transparency and adherence to Canadian legislation governing employment, including Employment Standards legislation, the Human Rights Act, Labour Relations codes, and Occupational Health and Safety legislation.

In the case of agency workers, our partners are mandated to adhere to our Ethical Trading Policy, with clauses enforcing compliance with Canadian legislation embedded within their contracts. Specifically in Ontario, we have mandated that all 3rd party labour agencies have a license in accordance with provincial law.

Effective communication is prioritized for both direct hires and agency workers, with information provided in various languages spoken by our staff. This includes town hall meetings and posters with QR codes for direct communication with our People Team. Controls are maintained for workforce engagement in product fulfillment, whether workers are directly employed or engaged through third-party labour providers. We are committed to continually enhancing controls over our third-party workforce to uphold our standards and effectively mitigate risks.

Supply Chain

Risk Assessment - Tier 1 Suppliers

In 2024, we built on our progress to better understand our supply chain by conducting a Supplier Ethical Risk Assessment. This assessment follows a two-stage approach (detailed below) to identify and address ethical risks in our Tier 1 supplier network.

1. **Preliminary Risk Screening:** We conducted an initial high-level analysis to identify broad risk themes, supplier risk categories, and potential areas of concern. This involved analyzing inherent risk data factors – such as industry, geography, and sector-specific ethical risks – to determine where further investigation was necessary.
2. **Detailed Supplier Risk Evaluation:** For suppliers flagged in high risk categories, subject matter experts conducted a deeper assessment, considering factors such as level of influence, country of operation, and annual spend. We leveraged SEDEX Supplier Self Assessment Questionnaires (SAQ) data, alongside internal business insights, to prioritize suppliers for further due diligence.

High Risk Supplier Prioritization

To enhance our focus on the most critical risks, we continued classifying Tier 1 suppliers into **low, medium, and high priority categories** based on factors such as:

- Strategic relevance to our business
- Spend and leverage over suppliers
- Level of engagement

This prioritization helped us **phase supplier onboarding onto SEDEX** and improve completion rates for the SAQ, ensuring better visibility into supplier risk profiles. We have included a metric on how many suppliers have completed their SAQ in the final section of this report.

High-Risk Categories

Our assessment identified **four categories with heightened ethical risk exposure**, including:

1. Packaging
2. Ingredients
3. Third-party labour + Third-Party Logistics (3PL)
4. Last mile

These categories were prioritized due to their potential links to **key ethical concerns such as child and forced labour, precarious working conditions**. The insights gained from this assessment inform our risk mitigation strategies, including **enhanced supplier engagement, targeted due diligence, and capacity-building initiatives**.

Risk Prevention & Management - Tier 1 Suppliers

As described in the overview of our supply chain, due to the level of integration and coordination required from many of our suppliers, HelloFresh Canada maintains strong, transparent relationships with our suppliers. As part of assessing supplier suitability from operational, safety or quality perspectives, we generally gain strong insights into their facilities and operating models. Below, we outline how we manage and mitigate the risks of child and forced labour within our supplier network.

1 Ethical Trading Policy Clause within our Master Services Agreement

We have integrated our Ethical Trading Policy into our contractual Master Service Agreements with our suppliers. From 2023 onwards, all new suppliers belonging to the 5 identified risk sectors are required to provide contractual assurances to comply with our Ethical Trading Policy before doing business with HelloFresh Canada. This helps manage child and forced labour risks as it builds a legal obligation to abide by our ethical standards. Additionally, through SEDEX, we monitor compliance through ongoing assessments and supplier engagement.

2 Supplier Ethical Data Exchange (SEDEX)

As a further measure, all HelloFresh Canada suppliers in identified risk sectors are required to become a member of SEDEX. As part of their SEDEX membership, our suppliers in identified risk sectors are also required by HelloFresh to complete the Self Assessment Questionnaire (“SAQ”). The SAQ asks suppliers to share information regarding their ethical practices by completing a comprehensive set of questions related to Labour, Health & Safety, Environment, and Business Ethics. HelloFresh has contractual authority to address specific concerns raised by this survey, which uses an algorithm to flag potential risks within the responses. Compliance with this requirement is being monitored regularly.

3 Sedex Member Ethical Trade Audit (SMETA) Audit

Based on the results from the SAQ risk assessment, suppliers may be subject to Preventive Action and/or Corrective Action Programs, which include:

- Supplier Audits and/or Visits
- Supplier undertaking commitments
- Supplier executive declarations with respect to labour practices
- Supplier trainings
- Corrective and preventive action plans

HelloFresh Canada suppliers who score “high-risk” from their completed SAQ are required to complete a SMETA audit for each high-risk site. SMETA is a reputable social audit methodology, designed to assess working conditions, health and safety, and environmental performance at the site level. The audit is conducted by an independent, third-party auditor and evaluates compliance with local laws, International Labour Organisation (ILO) Conventions, and the Ethical Trade Initiative’s (ETI) Base Code, ensuring a consistent and globally recognized standard for ethical trade.

HelloFresh reserves the right to mandate unannounced audits of direct suppliers if there is reason to suspect a serious infringement to its Ethical Trading Policy. Suppliers are expected to fully cooperate with unannounced audits, which includes responding to reasonable requests and providing full access to its facilities.

Suppliers identified in audits as failing to adhere to the Ethical Trading Policy are required to complete corrective actions to promptly remediate any violations. In case of severe violations or if suppliers are not willing to take corrective action, we reserve the right to suspend or terminate the business relationship with the respective supplier.

4 Action Plan

As a result of our 2024 ethical risk assessment, we have developed a comprehensive action plan with additional risk-specific preventive actions for identified high-risk categories. This action plan includes reviewing internal processes, raising awareness of our grievance mechanism and capacity-building.

Grievance Mechanism

At HelloFresh Canada, integrity, respect, and responsibility are core to our corporate culture. To uphold these values, we maintain a Global Whistleblowing System, including the HelloFresh | Speak Up! platform, which allows employees, business partners, and other stakeholders to report concerns anonymously, if preferred. This system ensures accountability by enabling the reporting of suspected breaches of HelloFresh Canada's policies, Code of Ethics, or Ethical Trading Policy—whether by an employee or supplier.

Concerns may include human rights violations, workplace safety risks, environmental breaches, harassment, corruption, and data protection issues. Reports are carefully reviewed by our Ethics & Compliance Team, who take appropriate corrective action and integrate findings into ongoing risk assessments.

Reports can be submitted via our online platform, where a secure mailbox can be set up for anonymous follow-ups, or through email at compliance@hellofresh.com and by post. Every report strengthens our ability to act swiftly, prevent harm, and reinforce ethical business practices across our operations and supply chain.

Measure to Remediate any forced / child labour risks in our operations

In the last financial year, we didn't identify any incidents of forced or child labour to remedy. We therefore did not need to take any measures to remediate an incident of forced or child labour. Any potential violations reported through our whistleblowing system, audits or other channels, are assessed and appropriate preventive or corrective actions are initiated where necessary. All ethical incidents are handled as part of a standardized incident management process.



Training Provided to Employees on Forced Labour and Child Labour

In 2024, we remained committed to strengthening our internal capacity on child and forced labour issues by equipping our teams with the knowledge and tools needed to identify and address these risks. As part of this effort, we implemented targeted internal training programs to ensure our teams are well-prepared to uphold ethical standards across our operations. Below are two key training initiatives delivered this year:

1 Ethical Trading E-Learning Module:

In 2024, we continued with the roll out of our Ethical Trade e-learning training to key functions including our procurement, sustainability, food safety and quality staff, legal, human resources, local distribution centre management teams and senior management. This interactive training consisted of three modules on our human rights strategy, ethical trading standards and how to uphold human rights in your day-to-day work. The completion of this training is being monitored and tracked and is included as a metric in the next section of this report for the 2024 financial year.

2 Forced Labour Internal Training:

In 2024, we prioritized additional training to help our teams recognize and respond to potential forced labour risks. We hosted a targeted session for our indirect procurement and operations teams, providing an overview of forced labour and its realities in Canada. This training focused on how to spot the signs of forced labour, understand key risk factors, and take appropriate action. We also provided documentation outlining indicators of forced labour and guidance on reporting concerns to the proper authorities in Canada. We are committed to continually enhancing controls over our third-party workforce to uphold our standards and effectively mitigate risks.

Assessing the Effectiveness of Action taken by HelloFresh to address risks of Forced and Child Labour Practices

HelloFresh SE's Ethical Trading Program is effective at addressing the risk of child labour and forced labour within our supply chain, as it provides for explicit and legally binding commitments from suppliers, and equips HelloFresh Canada with the authority to assess and investigate any risks, and to take preventative or corrective action where appropriate. The inclusion of relevant ethical trading commitments in HelloFresh Canada's contractual terms ensures that the relevant ethical standards are non-negotiable and provides HelloFresh Canada with a greater level of confidence that these standards can be enforced.

Additionally, HelloFresh Canada tracks and monitors the effectiveness of our human rights due diligence program across our operations and supply chains by measuring key metrics. Please see the below table to see the data reported in the 2024 financial year.

As part of the ongoing strategy to gather, verify, and independently assess information, we will continue allocating resources and work to areas with the highest risk of child and forced labour. We will take proactive measures to prevent and address any occurrences as needed.

% of suppliers onboarded onto SEDEX in identified risk sectors	40.44%
% of suppliers who have signed the Ethical Trading Policy in Identified Risk Sectors	58.47%
% of high priority suppliers who completed their SAQ in identified risk sectors	85.71%
% of employees in risk-relevant departments that have completed the Ethical Trading Training in Canada	100%

Process of Consultation

The HelloFresh Group is a worldwide group of companies operating in a number of jurisdictions, of which HelloFresh Canada is one component. As such, the measures that have been, and continue to be developed to address child and forced labour risks in supply chains around the world have been made on a consultative basis, ensuring that a single set of principles and values are communicated to our suppliers worldwide.

As a growing global business, HelloFresh SE is committed to presenting a “united front” in mitigating the risk of child and forced labour practices to the greatest extent possible, in order to uphold its role as a positive contributor to the business community, and in concert with its ambitions for sustainability, inclusivity and diversity, act as a good corporate citizen worldwide.

Our Partnerships



HelloFresh continues to be a member of SEDEX who are a global not-for-profit membership organization which works with its members to improve working conditions in global supply chains. SEDEX has more than 60,000 members in over 180 countries. SEDEX is one of the ethical trade organizations that we require our suppliers to be members of before we start trading with them.


Statement of Approval – Board of Directors

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of GDE Grocery Delivery E-Services Canada Inc.

In my capacity as a Director of GDE Grocery Delivery E-Services Canada Inc. and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. 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 Act, for the reporting year listed above.

This Statement has been reviewed and approved by the principal governing body of GDE Grocery Delivery E-Services Canada Inc., CEO Ian Brooks in his capacity as a Director of GDE Grocery Delivery E-Services Canada Inc.. GDE Grocery Delivery E-Services Canada Inc. is a wholly owned subsidiary of HelloFresh SE and this statement was prepared in consultation with, and was reviewed and approved by, HelloFresh SE.

DocuSigned by:

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Ian Brooks

CEO – GDE Grocery Delivery E-Services Canada Inc.

Board of Directors

Date: 5/7/2025

I have authority to bind GDE Grocery Delivery E-Services Canada Inc.